

SOUNDTRANSIT

TITLE VI PROGRAM UPDATE

***Submitted in fulfillment of Title VI of the Civil Rights Act Of 1964 And
Federal Transit Authority Circular 4702.1B***



2025

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AGENCY INFORMATION

The Central Puget Regional Transit Authority was incorporated on September 21, 1993 and operates under the Revised Code of Washington Chapters 81.104 and 81.112. Known locally as Sound Transit, the regional public agency has a mission to develop and deliver a regional public transportation system. The Sound Transit District is 1,087 square miles and includes Pierce, King and Snohomish Counties. Sound Transit builds and operates regional transit service including Link light rail, Sounder trains, ST Express Bus and Tacoma Link light rail. This service is in addition to local transit services provided in each of these three counties by other public transit operators.

Sound Transit is governed by an 18-member Board mostly made up of local elected officials proportional to the population included in the Sound Transit District. Three members are from Snohomish County; 10 from King County; and four from Pierce County. The last seat is held by the Washington State Secretary of Transportation. The Board establishes policies and gives direction and oversight. It is empowered under state law to identify ballot measures for voter approval of regional transit projects and maintains the Long-Range Plan that identifies potential projects to submit to voters.

Sound Transit has several service provider partners. King County Metro, Pierce Transit and Community Transit provide bus services and ADA complementary paratransit services. King County Metro also provides Link light rail services for Sound Transit under an inter-agency agreement. Sound Transit also has agreements in place with the BNSF and Amtrak for the operations (BNSF) and maintenance (Amtrak) of its Sounder commuter rail service.

INTRODUCTION

Sound Transit has prepared this updated Title VI Program in compliance with Title 49 CFR Section 21.9(b) and with the Federal Transit Administration (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."

This plan was prepared to ensure that the level and quality of Sound Transit's services are provided in a nondiscriminatory, safe, reliable, and equitable manner.

TITLE VI OF THE CIVIL RIGHTS ACT

Title VI of the Civil Rights Act of 1964 provides:

No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The intent of Title VI is to remove barriers and conditions that prevent minority and persons with limited English proficiency (LEP) from equal access to public services and programs.

In operating a federally assisted program, a recipient cannot, on the basis of race, color or national origin, either directly or through contractual means:

- Deny program services, aids or benefits.
- Provide a different service, aid or benefit, or provide them in a manner different than they are provided to others.
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit.

GENERAL REQUIREMENTS

This section addresses the General Requirements of FTA Circular 4702.1B. The following information addresses the reporting requirements as described under Chapter III of the Circular.

1. TITLE VI NOTICE TO THE PUBLIC

The Title VI Notice is included on the Sound Transit website.

- The Title VI Notice is included onboard all ST Express, Link light rail, and Sounder vehicles. The notice is posted on site at Sound Transit's publicly accessible offices.
- Title VI and nondiscrimination provisions are included in Sound Transit's contract provisions as appropriate.

The Title VI Notice is included in this program submittal as Appendix A.

2. TITLE VI COMPLAINT PROCESS AND COMPLAINT FORM

Sound Transit operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act.

In addition to complying with Title VI, Sound Transit also prohibits discrimination based on sex, age, disability, religion, and other protected classes enumerated in state and federal laws.

More information on Sound Transit's Civil Rights programs, including information on the filing of discrimination complaints, may be obtained by:

- calling 206-689-3302; TTY Relay 711
- emailing stdiscriminationcomplaint@soundtransit.org
- mailing to Sound Transit, Attn: Customer Service, 401 S. Jackson St. Seattle, Washington 98104-2826
- visiting the office located at 401 S. Jackson St. Seattle, Washington 98104

A complaint may also be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call 888-446-4511.

The Title VI Complaint Process (Appendix B) and Title VI Complaint Form (Appendix C) are translated into Spanish, Chinese, Vietnamese, Tagalog, Korean and Russian. These documents are available to the public via:

- Sound Transit website
- By mail

All Sound Transit Customer Service Representatives have received training to better assist passengers who wish to file a discrimination complaint.

3. TITLE VI INVESTIGATIONS, COMPLAINTS, & LAWSUITS

A list of transit-related Title VI complaints and investigations is included in this program submittal as Appendix D.

No Title VI lawsuits were filed during this triennial period.

4. PUBLIC PARTICIPATION PLAN

In December 2011, Sound Transit adopted Resolution R2011-15 Inclusive Public Participation Policy to assure meaningful access to public involvement and community outreach programs for minority, low-income, and LEP populations. The policy formally incorporated practices and strategies that have been in use and continued development since Sound Transit's initial program to build the regional transit system. The agency's Public Participation Plan (Appendix E) provides an overview of those practices and strategies for inclusive public participation.

Key features of the Inclusive Public Participation Policy are to ensure that Sound Transit's public involvement and community outreach programs are designed to meet the following goals, pursuant to Title VI of the Civil Rights Act of 1964:

- Providing services without regard to race, color or national origin.
- Promoting the full and fair participation of affected populations in transit decision-making.
- Preventing denial, reduction or delay in benefits related to programs and activities that benefit minority or low-income populations.
- Facilitating meaningful access to programs and activities by LEP persons.

The policy applies to planning and service aspects of Sound Transit projects. It reaffirms Sound Transit's commitment that it will continue to include low-income, minority, and limited English groups in its public involvement and community outreach programs, including service changes, fare changes and future service planning.

As set forth in the policy, Sound Transit will continue to design public involvement and community outreach programs to engage diverse populations by:

- Making materials available in multiple formats, holding meetings in accessible facilities, and providing meeting and project information to underserved populations.
- Meeting demands for LEP materials.
- Providing the public with innovative opportunities and methods for accessing agency and project information.
- Engaging diverse populations early in the planning and development process.

The Public Participation Plan provides a summary of the steps to ensure minority, low-income and LEP populations receive access to outreach activities. The plan outlines agency level strategies and tools designed to support more equitable engagement, current engagement tactics, examples of public participation, an overview of best practices and action items for future measurement and evaluation.

Sound Transit uses geographic information systems (GIS) mapping software to create maps that identify affected low-income, minority, and LEP communities. In 2021, the Agency also created an Equity Dashboard; an interactive data tool that features charts, tables and maps that help users visualize the demographics, travel behavior, and travel needs of people throughout the Sound Transit district. It allows for data to be filtered by demographic identifiers such as race/ethnicity, gender, income, English language proficiency, and other identifiers and is used to inform equity analyses and engagement strategies.

During this reporting period, Sound Transit coordinated and documented outreach and public involvement activities for multiple construction projects, rail expansions, transit-oriented development projects, service and fare changes, and station access improvements.

5. LANGUAGE ASSISTANCE PLAN / FOUR-FACTOR ANALYSIS AND IMPLEMENTATION PLAN

Sound Transit has a Language Assistance Plan (Appendix F) in place to ensure that LEP persons have access to programs, services, and public participation opportunities.

A first step in providing meaningful access to services for LEP individuals and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through analysis of available data. For this Program Update, Sound Transit updated its Four Factor Analysis that relied on recently available data including:

- Sound Transit GIS, 2022 US Census American Community Survey.
- Washington State Small Area Population estimates.
- Rider surveys including origin and destination surveys.

- Interpreter request data through the county court system or other county services.
- Internal data reflecting call center requests for language interpretation.

Four-Factor Analysis

Meaningful access is based on four factors:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP individuals come into contact with Sound Transit's programs, activities and services.
3. The importance of Sound Transit's programs, activities and services to LEP persons.
4. The resources available to the recipient and costs.

Sound Transit's Four-Factor analysis provides insight into the language groups in the Sound Transit District.

The six largest LEP language groups in the Sound Transit District are (in order): Spanish, Chinese (including Mandarin & Cantonese), other Asian and Pacific Island languages, other Indo-European languages, other unspecified languages, and Russian, Polish, or other Slavic languages.

The percentage of the Sound Transit District LEP populations for the top six languages are as follows:

Spanish	7.1%
Chinese (incl. Mandarin, Cantonese)	3.5%
Other Asian and Pacific Island languages	3.4%
Other Indo-European languages	3.4%
Other and unspecified languages	2.1%
Russian, Polish, or other Slavic languages	2.0%

Implementation Plan

Sound Transit strives to meet the language needs of LEP populations and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to Sound Transit programs and services. Sound Transit balances its overall commitment to the various LEP groups in the region with improvements aimed at benefiting speakers of the most spoken languages in the region.

Sound Transit uses many language-assistance measures including:

- **Telephone-based interpreters** – Sound Transit staff and consultants have access to interpreters who speak up to 100 languages. Sound Transit information is provided by establishing a conference call between non-English speaker, the interpreter, and the customer service representative.
- **Staff training** – Community outreach staff and front-line staff including reception, customer service, station agents, and fare ambassadors are prepared to respond to LEP individuals in person and using the telephone language line.
- **Community or project specific materials** – Sound Transit staff and consultants have access to translation services. Key materials for residents are translated or include a language block for languages relevant to that geographic area.
- **Sound Transit integrated website translation** – To improve access and utility of the website for LEP persons, the Sound Transit website, www.soundtransit.org, was redesigned in 2018 to include Google Translate, an integrated translation function that can automatically translate soundtransit.org content into 103 languages.

- **In-person interpreters and customized translation services** – Sound Transit contracts with vendors that provide translation and interpretation services upon request. Sound Transit provides interpreters at public meetings on request. As a part of its community engagement activities, Sound Transit is in contact with community representatives for whom a portion of their members are LEP persons and will provide interpreters based on their input.
- **Engage LEP populations directly to gain insight and understand needs** – Sound Transit surveys and meets with community organizations that serve LEP populations to assess, and where appropriate, implement expanded methods to serve LEP transit riders. Where possible, it employs methods to engage directly with LEP persons and obtain direct feedback.
- **Ticket vending machines** – Sound Transit’s Ticket Vending Machines (TVMs) are located at all ST Link light rail and Sounder stations and provide fare information for Link light rail, Sounder, and the regional ORCA card. The TVM’s are accessible in each of the six most prevalent languages other than English in the ST district. In addition to accessible TVMs, the ORCA program includes a website, mobile app, and advertising accessible in English, Spanish, Chinese, Korean, Russian, Tagalog, and Vietnamese.

6. **MINORITY REPRESENTATION OF PLANNING AND ADVISORY BODIES**

Sound Transit relies on the oversight and guidance from volunteers and works to ensure diverse representation on Sound Transit’s Citizens’ Accessibility Advisory Committee (CAAC), Community Oversight Panel (COP), and Diversity Oversight Committee (DOC) (Appendix G). A key consideration for all of these committees is representation spread across the three counties (King, Pierce and Snohomish) that comprise the Sound Transit District and the five subareas (Pierce, Snohomish, East King, North King and South King).

Citizens’ Accessibility Advisory Committee (CAAC)

Founded in 1999, the CAAC provides feedback regarding challenges and solutions for people with disabilities and older adults using Sound Transit buses and trains. The work of this committee enhances other public involvement groups and activities through its crucial focus on ADA compliance and accessibility best practices. It is an important part of the process that helps Sound Transit provide regional transportation that is accessible to everyone. Members are Sound Transit riders who have a disability, are 65 or older, family members or caregivers of people with disabilities or older adults, or professionals or volunteers in the field of disability and aging services. Sound Transit encourages committee members to spread the word regarding the CAAC to their respective organizations.

Community Oversight Panel (COP)

Created in 1997, the Community Oversight Panel (formerly the Citizen Oversight Panel, or COP) independently monitors Sound Transit and its commitment to build and operate the region’s high-capacity transit system. The COP is represented by at least two members from each of the five subareas. The recruitment process follows Board direction to: (1) establish a process to incorporate input from Board members within the subarea where recruitment is taking place, and (2) provide a process that is inclusive and allows for a diverse COP. In March 2022, the panel revised its procedures to attract applicants from a wider array of backgrounds. The COP has also switched to evening meetings once a month and introduced the use of hybrid meetings (with individuals having the option to join in-person or virtually) to become more accessible to a broader group of participants.

Vacancies on the panel are advertised to a wide audience by posting on the Sound Transit website and via social media; news release to media outlets, including community groups serving diverse populations, and blogs and forums; and flyers to jurisdictions, agencies, colleges and libraries within the subarea. Sound Transit staff also inform Sound Transit Board members and the Sound Transit Diversity Oversight Committee of vacancies.

Diversity Oversight Committee (DOC)

The DOC reports to the CEO and Board of Directors regarding Sound Transit's compliance with its guiding principles for small and disadvantaged business employment and contracting opportunities. The DOC is composed of members from throughout the Sound Transit District, and includes representatives from small businesses, trade and craft organizations, and community organizations in impacted neighborhoods, and other such interested parties as deemed appropriate by the CEO. Committee members are independent of Sound Transit, meaning they have no contracts with Sound Transit and no plan to compete for bid on Sound Transit contracts or subcontracts. The committee reflects the diversity of the communities in the Sound Transit District.

7. SUBRECIPIENT ASSISTANCE AND MONITORING

A Federal Transit Administration Subrecipient, or Subgrantee, is an entity that receives federal transit funds through a primary recipient, rather than directly from the FTA, but does not include a Third Party Contractor, Third Party Subcontractor, or Lessee. Within this framework, Sound Transit does not have subrecipients.

8. TRANSIT FACILITIES INFORMATION

Operations and Maintenance Facility South

A new Operations and Maintenance Facility (OMF) is needed in the South Sound to receive, store, and service a larger train fleet to support future light rail extensions to Tacoma, West Seattle and throughout the region. On May 28, 2024, Sound Transit published the [OMF South Facility Equity Analysis \(FEA\) Addendum](#) and the [Final Environmental Impact Statement \(EIS\)](#) for the project. The Sound Transit Board made the decision to site the facility at the 336th Street alternative in June 2024.

Maintenance of Way Facility

As of 2025, the North Maintenance of Way (MOW) Permanent Facility FEA project is on pause without a clear timeline for when it will be resumed.

Operations and Maintenance Facility North

A new OMF is needed in the North Sound to support the Everatt Link Extension (LE) and system-wide expansion needs, and will have the capacity to receive, store and service a larger train fleet to support Link extensions. To build this facility, 80+ acres of property is needed near the light rail line. As of 2025, Sound Transit is on track to begin developing the OMF North FEA. In 2026, Sound Transit expects to publish the OMF North FEA along with the publication of the Everett LE Draft EIS.

Requirements for Transit Providers

9. SERVICE MONITORING – SYSTEM WIDE SERVICE STANDARDS AND SERVICE POLICIES FOR EACH MODE

Sound Transit is required by FTA to measure the quality of service delivered to communities and to demonstrate that resources are distributed in a way that does not discriminate on the basis of race, color or national origin. The Title VI Service Monitoring Report documents Sound Transit's compliance with FTA Circular 4702.1B by reporting results of performance monitoring and distribution of amenities across all modes of service. The purpose of the Title VI service monitoring requirement is to ensure that decisions related to the distribution of fixed route transit service and facilities have not resulted in a disparate impact or disproportion burden on protected populations. The report provides an overview of Title VI requirements as well as context for Title VI in Sound Transit's service area, details the methodology for analysis of demography, corridor descriptions, standards, and policy, and highlights areas for further analysis.

Sound Transit monitors the service standards and service policies shown in the following table to evaluate results for minority or low-income populations compared to non-minority and non-low-income populations.

Service Standards Monitoring	Service Policy Monitoring
• Passenger Load (Crowding)	• Escalator and Elevator Conveyance
• On-Time Performance	• Bike Rack Distribution
• Customer Complaints	• Bike Cage/Lockers Distribution
• Trips Operated as Scheduled	• Shelter Distribution
• Span of Service	• Seating/Bench Distribution
• Frequency	• Vehicle Assignment
• Service Availability	

Table 1: Service Standards and Measures

The Title VI Service Monitoring Report identifies areas of lower service and policy performance impacting Title VI protected populations. Based on analysis of a variety of data sources, it was determined that ST Express Bus and Link Light Rail routes or stops/stations serving minority and low-income populations had the greatest number of disparate impacts or disproportionate burdens and instances where routes were not meeting service standards. This is a result of impacts from operator shortages, and the structure of the Sound Transit system compared to the requirements of FTA circulars 4702.1B. The circular requires each route to be classified as minority or non-minority and low-income or non-low-income and then compared across mode and to the service standard to determine disparate impacts or disproportionate burdens among minority and low-income populations.

Sound Transit only operates one streetcar route (Tacoma Link); therefore, a comparison cannot be made between routes within the same mode. Because only one route exists for this mode, it can only be compared to the service standard. Additionally, all commuter rail and light rail routes are classified as non-minority routes; therefore, a comparison cannot be made between non-minority and minority routes for these modes. Lastly, it should be recognized there are geographical and operating constraints on Sounder commuter rail as the line is shared among several operators and not owned by Sound Transit. The full report, including plans for mitigation of findings is included in Appendix H.

Requirements for Transit Providers (50+ Fixed Route / Peak Service in UZA of 200,000+)

10. DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

Demographic and Service Profile Maps and Charts are included in this program submittal in Appendix I.

11. DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS

Sound Transit conducted its most recent origin-destination survey on board trains and buses in the spring of 2024. It developed a sampling plan targeting representation of weekday trips including all ST Services and a selection of King County Metro and Community Transit Routes based on ridership levels. Bus routes from peer agencies were added to the survey if they were considered routes that could plausibly be replaced by the Lynnwood extension or the Federal Way link extension once these opened. Under this criterion, no Pierce Transit routes were surveyed. ST conducted the survey between 6 am and 9 pm. As discussed more in the conclusion of the full report, this methodology has limitations that result in certain groups being underrepresented. However, ST attempted to correct some of this bias by weighing survey results based on known ridership patterns such as the share of boardings by mode, time of day, and segment where the respondent boarded or alighted. The full report is included in Appendix J.

12. DISPARATE IMPACT AND DISPROPORTIONATE BURDEN POLICY AND MAJOR SERVICE AND FARE CHANGE POLICY

In 2022, Sound Transit drafted a new policy R2022-19, that would consolidate, update, and replace R2013-18 and R2013-19. The new policy better reflects the growing region and network of transit services. The updated policy better prepares the agency for evaluating potential changes in the next few years.

The policy includes the following:

- **Definition of low-income.**

Aligns with the poverty guidelines set by the Department of Health and Human Services utilized by the regional transit fare program to determine low-income reduced fare eligibility.

- **Determination of a potential service change as “major”.**

The former policy measured “platform service hours,” which included time that buses and trains were traveling to/from maintenance bases in addition to time carrying riders. The new policy uses “revenue service hours” or the time that buses and trains carry riders. This update allows Sound Transit to better measure changes in the amount of service delivered to riders. Second, we reduced the distance we can move a bus stop from half a mile to a quarter mile before causing a major service change. This update helps highlight changes to rider experience and access when evaluating potential stop location changes.

- **A threshold of 5% for individual changes.**

In the former policy any numerical difference from system average, in practice 0% absolute difference, identifies a Title VI protected route. This new threshold establishes a more meaningful statistical comparison across the system, allowing us to better prioritize routes serving Title VI protected populations.

When a proposed major service change to a single line or route creates a potential adverse effect, a disparate impact or disproportionate burden occurs when the percentage of the adversely affected minority or low-income population in the service area of the line or route exceeds the percentage of the minority or low-income population within the Sound Transit district by at least five percentage points (e.g. 15 percent of the population adversely affected is low-income compared to a district low-income population of 10 percent).

A copy of the Disparate Impact and Disproportionate Burden policy and documentation of associated board action adopting Resolution R2022-19 is included in Appendix K.

13. UPDATE TO THE PUBLIC ENGAGEMENT PROCESS FOR SETTING THE DISPARATE IMPACT AND DISPROPORTIONATE BURDEN POLICY AND MAJOR SERVICE AND FARE CHANGE POLICY

In July of 2022, the Sound Transit board adopted R2022-19, a new Disparate Impact and Disproportionate Burden Policy which includes the Major Service Change Policy. Prior to adoption, public engagement was conducted with community stakeholder groups including the Transportation Access Coalition and Citizens' Accessibility Advisory Committee. The general public was invited to provide comment on the draft policy via a dedicated policy page on the Sound Transit website. The website utilizes integrated translation services to translate content into 103 languages. The policy page and embedded survey was open for public comment for a period of two weeks. The survey was made available in the top six Title VI languages. A link to the website was shared on Sound Transit's social media platforms as well, in addition to a press release.

Responses to the draft policy were minimal with most of the relevant feedback focused on simplifying the policy language. A copy of the Disparate Impact and Disproportionate Burden policy and documentation of associated board action adopting Resolution R2022-19 is included in Appendix K.

14. SERVICE AND FARE EQUITY ANALYSES

Service Equity Analyses

As part of the annual Service Implementation Plan, Sound Transit conducts a service equity analysis to ensure changes in transit service are consistent with Title VI policies defined by the Federal Transit Administration and policies defined by the Sound Transit Board of Directors. Full versions of annual service plans as well as the results of all service and fare equity analyses completed are available either online or by request.

In addition to those regularly conducted analyses, Sound Transit completed analyses on new fixed capital way projects that included:

- Downtown Redmond Link Extension
- East Link Starter Line
- East Link
- Federal Way Link Extension

Service equity analyses for individual projects have been separately submitted for FTA review following Sound Transit board approval.

15. BOARD ACTION DEMONSTRATING THE BOARD HAS REVIEWED AND APPROVED THE TITLE VI UPDATE SUBMITTAL

Sound Transit's Board approved this 2025 Title VI Program submittal to the Federal Transit Administration at their meeting held on September 25, 2025. The Sound Transit Motion No. M2025-44, is included as Appendix L.

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