



Susan Fletcher
Acting Regional Administrator
Federal Transit Administration
915 Second Ave., Suite 3142
Seattle, WA 98174-1002

Sound Transit 2023 Triennial Review - Response to Draft Report

Dear Ms. Fletcher:

The Sound Transit (ST) team extends our gratitude to the FTA and the contractor review team, Holmes & Company/Tuba Group, for your time and effort with this Triennial Review. We appreciate that these reviews ensure ST's compliance with FTA requirements and support our ongoing commitment to providing a safe, equitable, and successful regional transit system.

Sound Transit reviewed the 2023 Triennial Review draft report dated May 5, 2023. Noted below are ST's responses and corrective actions to the deficiencies identified in the draft report. We also provided edits and corrections to the draft report, which can be found in the attached document.

5. Technical Capacity – Project Management

Deficiency Code TC-PjM3-1: inadequate oversight of transit management contractors

During the review, Sound Transit did not provide documentation that it was providing oversight of the Link light rail service operated by King County Metro (KCM). In the RIR documents provided prior to the site visit, Sound Transit provided two documents, "Sound Transit Contractor Oversight Plan Sounder Commuter Rail, effective 9/9/2021", and "Sound Transit ST Express Bus Operations Oversight Program, effective 12/13/2021". During the site visit, documentation was provided by Sound Transit staff confirming that it was monitoring Sounder commuter rail and ST Express Bus Operations as provided in the oversight documents. During the site visit, documentation provided showed that there was insufficient oversight of the Link light rail and staff did identify past issues with staffing as a major reason for the problem. During the site visit, Sound Transit provided a document entitled "Sound Transit Link Operations Program Plan Rev 1, effective 1/23/2023". Sound Transit did not provide documentation that it had implemented the provisions of the Program Plan.

Corrective Action: For the deficiency, TC-PjM3-1, inadequate oversight of transit management contractors, Sound Transit must submit to the FTA regional office documentation of implementation of the Link Operations Program Plan v.1. Documentation should show that ST has conducted the scheduled weekly, monthly, and ad hoc reviews described in the plan for the next 90 days.

ST Corrective Action: May 15, 2023, Sound Transit met with FTA and the review team to further discuss and present steps already taken to correct this deficiency. ST's Director of Link Light Rail Maintenance, Karl Shoemaker, presented the oversight matrix and evidence of implementation of various activities the ST Link team is tracking to ensure proper oversight of ST's light rail contracted service provider. **FTA and the review team concurred during the meeting that this**

Central Puget Sound Regional Transit Authority • Union Station
401 S. Jackson St., Seattle, WA 98104-2826 • Reception: (206) 398-5000 • FAX: (206) 398-5499
www.soundtransit.org

CHAIR

Dow Constantine
King County Executive

VICE CHAIRS

Kent Keel
University Place Councilmember

Dave Somers
Snohomish County Executive

BOARD MEMBERS

Nancy Backus
Auburn Mayor

David Baker
Kenmore Councilmember

Claudia Balducci
King County Councilmember

Bruce Dammeier
Pierce County Executive

Cassie Franklin
Everett Mayor

Christine Frizzell
Lynnwood Mayor

Bruce Harrell
Seattle Mayor

Debora Juarez
Seattle Council President

Joe McDermott
King County Councilmember

Roger Millar
*Washington State Secretary
of Transportation*

Ed Prince
Renton Councilmember

Kim Roscoe
Fife Mayor

Dave Upthegrove
King County Council Chair

Peter von Reichbauer
King County Councilmember

Kristina Walker
Tacoma Councilmember

CHIEF EXECUTIVE OFFICER

Julie Timm

matrix satisfied compliance and would close the deficiency and remove it from the final report. A copy of the matrix was provided to FTA and the review team.

7. Satisfactory Continuing Control

Deficiency Code SCC9-2, non-permitted use of equipment disposal proceeds

Since the last Triennial Review, Sound Transit has disposed of a number of assets that were past their useful life. In each case, Sound Transit notified FTA and received FTA approval for the disposals. However, Sound Transit did not notify the FTA or return the FTA share when the net proceeds exceeded \$5,000. As shown in the table below, five assets generated net proceeds in excess of \$5,000.

Following the site visit, Sound Transit provided documentation that it placed the proceeds for all of the items in a restricted account to be used against a future FTA award. Based on the proceeds and the federal share, ST was only required to restrict \$12,497.24. Accounting records provided by ST showed that it actually restricted more than required (\$29,754) because on a few occasions it restricted the entire proceeds. Sound Transit has not yet applied the proceeds to any other awards.

Date	Item Description	Asset #	Net Proceeds	FAIN	Fed %	Fed Amount Required	Actual Restricted
3/18/20	2008 Chevy Pickup	11173	\$14,442.00	WA-03-0142	24.16%	\$ 3,489.19	\$14,442.00
3/18/20	2007 Chevy Pickup	11168	\$5,976.00	WA-03-0142	24.16%	\$ 1,443.80	
2/16/21	2008 Ford F-350	11404	\$5,160.00	WA-03-0142	24.16%	\$ 1,246.66	
9/1/21	2008 Chevy 2500	11171	\$15,312.00	WA-03-0142	24.16%	\$ 3,699.38	\$15,312.00
9/1/21	Ford E-350	11452	\$10,837.00	WA-03-0142	24.16%	\$ 2,618.22	
Total						\$ 12,497.24	\$29,754.00

Corrective Action: For the deficiency, SCC9-2, non-permitted use of equipment disposal proceeds, Sound Transit must work with the FTA regional office to include the FTA share of \$12,497.24 in a future award.

ST Corrective Action: Sound Transit has included the FTA share of \$12,497.24 in its FY 2023 5337 HIFG grant that is currently in development in FTA's TrAMS identified as grant 5656-23-5 and expected to be obligated by December 31, 2023. Sound Transit will notify FTA once the funds are obligated or provide additional documentation and justification if the schedule for the obligation of funds is delayed.

12. Americans with Disabilities Act (ADA) – General

Deficiency Code ADA -GEN9-1: elevator service deficiency

During the review, Sound Transit did not provide documentation that it had any standard operating procedures (SOPs) regarding accommodating passengers when an elevator was out of service. Verbal discussions on the subject described situations that had the passenger being responsible for determining the trip solution as the result of an inoperative elevator and not Sound Transit.

Deficiency Code ADA-GEN13-1: Insufficient oversight of contracted service for ADA requirements

During the review, Sound Transit did not provide documentation that it had and was implementing service provisions, e.g., monitoring transit employees.

Corrective Actions: For the deficiency, ADA -GEN9-1, elevator service deficiency, Sound Transit must submit to the

Regional Civil Rights Officer (RCRO) documentation that it has implemented procedures to accommodate passengers when an elevator is out of service.

For the deficiency, ADA-GEN13-1: Insufficient oversight of contracted service for ADA requirements, Sound Transit must submit to the RCRO procedures for ensuring that contractors and lessees comply with the ADA service provisions, along with evidence of implementation.

ST Corrective Action ADA -GEN9-1: Sound Transit recognizes the need to develop a comprehensive approach to accommodating passengers with disabilities who need elevator access at those times when elevator outages at a station are a barrier between the platform and street level. Procedures exist for each of our Sounder (commuter rail) stations with elevators that provide above-grade track crossings; examples are provided for the [Everett, Mukilteo and/or King Street Stations]. We will develop comparable procedures for each of our current Link light rail stations with elevators, as well as our two freeway stations served by ST Express commuter bus. **Sound Transit will provide FTA with a timeline by September 30, 2023, for FTA review and concurrence to include the development and implementation details and schedule for these procedures.**

ST Corrective Action ADA-GEN13-1: On May 15, 2023, Sound Transit met with FTA and the review team to further discuss and present the steps ST takes to ensure oversight of contracted service for ADA requirements. During this meeting ST Link Operations staff provided an overview of its monitoring procedures in place and documentation of how those procedures are being implemented to ensure ST's transit partners are complying with ADA service provisions related to the service they operate for Sound Transit. Copies of those procedures and additional documentation were provided to the FTA. FTA and the review team concurred during the meeting that these procedures were sufficient, but that additional documentation was needed to verify that ST's procedures are being implemented. **Sound Transit will provide this additional review documentation representing the inclusion of ADA compliance to the FTA by July 31st, 2023.**

13. ADA – Complementary Paratransit

Deficiency Code ADA-CPT1: failure to provide complementary paratransit

Sound Transit directly operated the Tacoma Link light rail service and did not provide ADA complementary paratransit service. On its website, Sound Transit stated that Pierce Transit provided ADA complementary paratransit and had the following: "ADA complementary paratransit service for Tacoma Link (downtown Tacoma) Pierce Transit provides paratransit service for Tacoma Link light rail. To obtain eligibility information, contact Pierce Transit SHUTTLE Eligibility at 253-984-8216/TTY Relay 711. To schedule paratransit trips, call SHUTTLE - Reservations and Information at 253-581-8100/TTY Relay 711."

During the site visit, Sound Transit indicated that it had no formal relationship with Pierce Transit for the provision of the service. This is evidenced by the fact that the Tacoma Link light rail had free fares and the Pierce Transit ADA paratransit service charged \$1.75 for a trip on its SHUTTLE service.

Deficiency Code: ADA-CPT7-1, insufficient oversight of contractors/other private entities providing ADA complementary paratransit

Sound Transit was not providing adequate oversight of King County Metro (KCM) for the provision of ADA complementary paratransit. During the review, Sound Transit provided a document entitled "King County Metro Access RideGuide, revised June 2020" that had information on personal care attendants (PCAs) and visitors that was not in conformance with the ADA requirements and also provided the KCM ADA paratransit application that required inappropriate information, i.e., age and sex. Sound Transit had not monitored these documents for compliance with the ADA complementary paratransit requirements.

Corrective Actions:

For the deficiency, ADA-CPT1-1, failure to provide complementary paratransit, Sound Transit must submit to the RCRO a plan with milestones for implementing paratransit as a complement to its (Tacoma Link) fixed-route service according to the criteria described in 49 CFR Part 37, subpart F.

For the deficiency, ADA-CPT7-1, insufficient oversight of contractors/other private entities providing ADA complementary paratransit, Sound Transit must submit to the RCRO specific procedures for ensuring that contractors/partners comply with the ADA complementary paratransit requirements and evidence of implementation, including but not limited to eligibility criteria; PCA approval; and visitor policy.

ST Corrective Action ADA-CPT1: Sound Transit will submit to the RCRO a plan with milestones for implementing paratransit as a complement to its (Tacoma Link) fixed-route service according to the criteria described in 49 CFR Part 37, subpart F, **no later than July 31st, 2023.**

ST Corrective Action ADA-CPT7-1: On April 28th, 2023, Sound Transit submitted to the FTA and review team a copy of its Paratransit Oversight Manual, 2022 Access Ride Guide and Paratransit Audit Procedure. On May 16, 2023, Sound Transit also submitted to the FTA and review team the “Paratransit Oversight Supplemental Documentation and Procedures” that provides further documentation of procedures and information ST is tracking and using to monitor and ensure that our transit contractors (KCM) are complying with ADA complementary paratransit requirements. Further actions already completed or underway include:

- Eligibility Application form will be modified to ensure clarity for the birth date question by June 30, 2023 (online and in print);
- Visitor Policy has been modified and will be submitted to FTA no later than June 30, 2023;
- PCA registration (modified from “approved” to “registered”) has been updated on the website and in all the digital materials already. New guides will be printed no later than September 30, 2023 and distributed thereafter; and,
- ST’s final Paratransit Audit Procedure is signed, a copy is included in the TR Shared File site. The first audit to take place in the Summer/Fall of 2023.

Sound Transit will provide documentation of these actions and Paratransit Audit results no later than September 30, 2023.

18. Drug and Alcohol Program

Deficiency Code DA1-1: drug and alcohol policy missing required element

Sound Transit has a Drug and Alcohol Program for its safety-sensitive employees. The policy, Tacoma Link Light Rail Substance Abuse Policy, was approved by Sound Transit’s CEO on 8/3/2021. The policy contains all of the required elements except that it was not approved by the Board of Directors.

Corrective Action: For the deficiency, DA1-1, drug and alcohol policy missing required element, Sound Transit must submit to the FTA regional office proof of adoption of the Tacoma Link Substance Abuse Policy (SAP) by the Sound Transit governing body.

ST Corrective Action: Sound Transit’s Office of Labor Relations will gain ST Board approval for the Tacoma Link Substance Abuse Policy. **A copy of the ST Board adopted policy will be provided to FTA Region 10 no later than September 30, 2023.**

19. Section 5307 Program Requirements

Deficiency Code 5307:3-1: no written policy for public comment

Sound Transit did not have a written policy that described the public comment process on major service reductions. Sound Transit did have a written policy that described the public comment process for increases in the basic fare, as described in Motion No. M2004-53. The Sound Transit policy document provided in Resolution R2022-19 was established for when the agency conducted equity analyses as required by the FTA.

Corrective Action: For the deficiency, 5307:3-1, no written policy for public comment, Sound Transit must submit to the FTA regional office a written policy that describes the public comment process on implementing a major service reduction.

ST Corrective Action: Sound Transit has a robust public engagement program for major service reductions and the agency has been very successful in engaging with communities, riders, stakeholders, and operational

and jurisdictional partners to help inform the decisions of our Board of Directors to adopt recommended service changes or revisions, including reductions. **By December 30, 2023, Sound Transit will complete and provide to the FTA a Board-approved written policy that describes the public comment process on implementing a major service reduction.**

Again, thank you for your contribution to Sound Transit's ongoing commitment to excellence in providing a successful regional transit system. If you have any questions, please contact Monica Overby, Director of Grants, at Monica.Overby@soundtransit.org or 206-689-4979.

Sincerely,



Julie E. Timm
Chief Executive Officer

Cc: Kristy Ziglar, Director, Office of Financial Management and Program Oversight, FTA
John Henry, Chief Financial Officer, Sound Transit
Lisa Wolterink, Deputy Exec Director Fares, Grants, Revenue, Sound Transit
Paul Denison, Deputy Exec Director – Transportation and Maintenance, Sound Transit
Robin Braziel, Exec Operations Director – Commuter Rail, Bus, Paratransit, Sound Transit
Marcus Clark, Deputy Director – Passenger Services, Sound Transit
Chris Elwell, Acting Executive Director Labor Relations, Sound Transit
Jennifer Lemus, Director – Systems Engagement, Sound Transit



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

June 2, 2023

Dow Constantine
County Executive, King County
King County Chinook Building
401 5th Avenue, Suite 800
Seattle, WA 98104

Re: Federal Transit Administration (FTA) Fiscal Year 2023 Triennial Review Final Report

Dear Mr. Constantine:

I am pleased to provide you with a copy of this FTA report as required by 49 U.S.C. Chapter 53 and other Federal requirements. The enclosed final report documents the FTA's Triennial Review of Central Puget Sound Regional Transit Authority d/b/a Sound Transit in Seattle, WA. Although not an audit, the Triennial Review is the FTA's assessment of Sound Transit's compliance with Federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with award requirements.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address Sound Transit's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021.

The Triennial Review focused on Sound Transit's compliance in 23 areas. Deficiencies were found in six areas: Technical Capacity – Project Management, Satisfactory Continuing Control, Americans with Disabilities Act (ADA) – General, ADA – Complementary Paratransit, Drug and Alcohol Program, and Section 5307 Program Requirements. Sound Transit had no repeat deficiencies from the Fiscal Year 2019 Triennial Review. Following the issuance of the draft report, Sound Transit submitted corrective action to close the deficiencies in Technical Capacity – Project Management and Satisfactory Continuing Control.

Dear Mr. Constantine

Page 2

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Mr. Mark Stojak, FTA Transportation Program Specialist, at 206-220-7501 or by email at mark.stojak@dot.gov.

Sincerely,

Susan Fletcher

Acting Regional Administrator

cc: Julie Timm, Sound Transit
Monica Overby, Sound Transit
Kristine Ziglar, FTA Region 10
Mark Stojak, FTA Region 10
Christopher MacNeith, FTA Office of Civil Rights
Nicholas Sun, FTA Office of Civil Rights

Enclosure

FINAL REPORT

**FISCAL YEAR 2023
TRIENNIAL REVIEW**

of

**Central Puget Sound Regional Transit Authority
Sound Transit
Seattle, WA
ID: 5656**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 10**

Prepared By:

**Holmes & Company, LLC
Subcontractor to Tuba Group**

**Scoping Meeting Date: February 23, 2023
Virtual Site Visit Entrance Conference Date: March 28, 2023
Virtual Site Visit Exit Conference Date: April 7, 2023
Draft Report Date: May 5, 2023
Final Report Date: June 2, 2023**

Table of Contents

I. Executive Summary	1
II. Review Background and Process	3
1. Background	3
2. Process	3
3. Metrics.....	4
III. Recipient Description	5
1. Organization	5
2. Award and Project Activity.....	6
IV. Results of the Review	10
1. Legal	10
2. Financial Management and Capacity	10
3. Technical Capacity – Award Management	10
4. Technical Capacity – Program Management & Subrecipient Oversight	10
5. Technical Capacity – Project Management.....	11
6. Transit Asset Management	11
7. Satisfactory Continuing Control.....	12
8. Maintenance.....	13
9. Procurement	13
10. Disadvantaged Business Enterprise (DBE).....	13
11. Title VI	13
12. Americans with Disabilities Act (ADA) – General.....	14
13. ADA – Complementary Paratransit.....	15
14. Equal Employment Opportunity	17
15. School Bus	17
16. Charter Bus	17
17. Drug Free Workplace Act.....	18
18. Drug and Alcohol Program	18
19. Section 5307 Program Requirements	18
20. Section 5310 Program Requirements	19
21. Section 5311 Program Requirements	20
22. Public Transportation Agency Safety Plan (PTASP).....	20
23. Cybersecurity.....	20

V. Summary of Findings.....	21
VI. Attendees.....	24
VII. Appendices	26

I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the Central Puget Sound Regional Transit Authority (Sound Transit) of Seattle, WA. The FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by Holmes & Company, LLC Subcontractor to Tuba Group. During the site visit, administrative and statutory requirements were discussed and documents were reviewed.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to Sound Transit’s compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021. Sound Transit was also requested to share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The FY2023 Triennial Review focused on Sound Transit’s compliance in 23 areas. No deficiencies were related to the COVID-19 Relief. There were no repeat deficiencies from the FY2019 Triennial Review. Following the issuance of the draft report, Sound Transit submitted corrective actions to close the deficiencies in Technical Capacity – Project Management and Satisfactory Continuing Control.

Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
5. TC – Project Management (TC-PjM)	TC-PjM3-1*	Inadequate oversight of transit management contractors.
7. Satisfactory Continuing Control (SCC)	SCC9-2*	Non-permitted use of equipment disposal proceeds.
12. Americans with Disabilities Act (ADA) – General (ADA-GEN)	ADA-GEN9-1	Elevator service deficiency.
	ADA-GEN13-1	Insufficient oversight of contracted service for ADA requirements.
13. ADA – Complementary Paratransit (ADA-CPT)	ADA-CPT1-1	Failure to provide complementary paratransit.
	ADA-CPT7-1	Insufficient oversight of contractors/other private entities providing ADA complementary paratransit.
18. Drug and Alcohol Program (DA)	DA1-1	Drug and Alcohol Policy missing required element.

Review Area	Deficiencies	
	Code	Description
19. Section 5307 Program Requirements (5307)	5307:3-1	No written policy for public comment.

* Deficiencies closed following issuance of the draft report

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49 (49 U.S.C. 5307(f)(2)) requires that “At least once every 3 years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient’s program, specifically referring to compliance with statutory and administrative requirements...” This Triennial Review was performed in accordance with the FTA procedures (published in FTA Order 9010.1B, April 5, 1993).

The Triennial Review includes a review of the recipient’s compliance in 23 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of Sound Transit. The review concentrated on procedures and practices employed since Sound Transit previous Triennial Review; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of award funds. The specific documents reviewed and referenced in this report are available at the FTA’s regional office or the recipient’s office.

2. Process

The Triennial Review includes a pre-review assessment, a desk review and scoping meeting with the FTA regional office, and a site visit to the recipient’s location. Due to the COVID-19 Public Health Emergency, a virtual site visit was conducted of each recipient. In addition, the review was expanded to address the recipient’s compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 relief funds received through the CARES Act, CRRSAA of 2021, and the ARP Act of 2021. Recipients were also requested to share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The fiscal year (FY) 2023 process began with the regional office transmitting, a recipient information request (RIR) to Sound Transit on November 28, 2022 indicating a review would be conducted. While Sound Transit prepared its response to the RIR, the regional office and review team conducted a scoping meeting on February 23, 2023. Necessary files retained by the regional office were sent to the reviewers electronically. Following the desk review and scoping meeting, the reviewer(s) and the recipient corresponded and exchanged information and documentation in preparation for the virtual site visit. As a result of this review, an agenda package indicating the issues that would be discussed, records to be reviewed, and interviews to be conducted was then sent to the Sound Transit on March 17, 2023. The site visit to Sound Transit occurred on March 28-29, 2023.

The site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The reviewers conducted additional interviews and reviewed documentation to evidence Sound Transit’s compliance with FTA requirements.

Upon completion of the site visit, the FTA and the reviewer(s) provided a summary of preliminary findings to Sound Transit at an exit conference. Section VI of this report lists the individuals participating in the site visit.

3. Metrics

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:

- Not Deficient (ND): An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- Deficient (D): An area is considered deficient if any of the requirements within the area reviewed were not met.
- Not Applicable (NA): An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.

III. Recipient Description

1. Organization

The Central Puget Sound Regional Transit Authority (Sound Transit) was authorized by the Washington legislature and codified in the Washington State Law (Revised Code of Washington Chapter 81.112–Regional Transportation Authorities). Sound Transit was created in 1993 to plan, build and operate the commuter rail, light rail, express bus services and facilities for the Central Puget Sound region, to serve the counties of King, Pierce, and Snohomish. On November 5, 1996, voters within the three-county Sound Transit district approved an increase in local taxes to fund the local share of Sound Move investments.

Sound Transit is governed by an 18-member Board made up of local elected officials proportional to the population included in the Sound Transit district. Three members are from Snohomish County; ten 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. King County Metro provides Link light rail services and ADA complementary paratransit 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.

Link Light Rail – Sound Transit operates a fleet of 98 Light Rail Vehicles on a line that is 23 miles long and has 19 stations. King County Metro operates the portion of the light rail line in Seattle and Sound Transit directly operates the light rail line known as the Tacoma Link.

STX Express Bus Service – Sound Transit operates a total of 204 commuter buses (170 active and 34 spares) over 23 routes during peak service hours. The vehicles are owned by Sound Transit and operated under contract, by its partners, King County Metro, Pierce Transit and Community Transit.

Sounder Commuter Rail – The commuter rail service, known as Sounder consist of a fleet of 78 FTA-funded rail cars over two lines, the North Line and the South Line. The total travels 82 miles and includes 12 stations.

Complementary Paratransit Service – Sound Transit does not directly operate paratransit service or own paratransit vehicles. It has a contract with King County Metro to operate paratransit service complementary to the Light Rail service in Seattle and Sound Transit relies on Pierce to operate paratransit service complementary to the Tacoma Link.

2. Award and Project Activity

Below is a list of Sound Transit’s open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description
WA-2019-001-06	\$820,842,984	2018	Lynnwood Link Extension FFGA
WA-2021-085-00	\$1,500,000	2021	FY2021 CMAQ Transferred to Section 5307 Auburn Sounder Station Access Improvements
WA-2018-013-01	\$90,881,229	2018	ST Tacoma Link Extension - Tacoma, Washington
WA-2021-115-00	\$7,255,465	2021	FY2021 CMAQ funds transferred to Section 5307 and FY2021 Section 5307 for I-405 Bus Rapid Transit Expansion Buses
WA-2020-001-04	\$522,983,701	2020	Federal Way Link Extension FFGA
WA-2020-007-01	\$5,400,000	2019	FY19 CMAQ transfer to 5307 for I-405 Bus Rapid Transit - Bus Procurement
WA-2022-065-00	\$3,668,478	2022	FY2022 Section 5307 Replacement/Upgrades to the Passenger Information Systems (PIMS)
WA-2021-012-00	\$4,800,000	2021	FY2020 Section 5339(b) SR 522/NE 145th Bus Rapid Transit (BRT) Vehicles
WA-2021-140-00	\$1,421,500	2020	FY2020 FHWA CARSI Grade Crossing Enhancements at Puyallup Commuter Rail Station
WA-2021-004-00	\$2,000,000	2020	FY19 MAP-21 20005(b) Pilot Program for TOD Planning - Everett Link Extension Model Code Partnership
WA-2020-002-00	\$5,600,000	2020	FY19 CMAQ transfer to 5307 - South Sounder Capacity Expansion
WA-03-0237-11	\$767,854,495	2008	FY15 5309NS University Link FFGA

Sound Transit received Supplemental Funds for operating assistance in award numbers, WA-2020-045 and WA-2021-141. This is Sound Transit’s first Triennial Review including the receipt of operating assistance from the FTA.

Projects Completed

In the past few years, Sound Transit completed the following noteworthy projects:

- Northgate Link Extension: A 4.3-mile extension of light rail from the University of Washington to the Northgate neighborhood. There are two underground stations (Roosevelt and U District) and an elevated station (Northgate); and a parking structure is at the Northgate Station. Opened for revenue service 2021.
- Operations and Maintenance Facility East: This Link Operations and Maintenance Facility East (OMF East), located in Bellevue, supports the region’s growing light rail fleet as service expands. The facility opened in 2021.
- ORCA Next Generation fare collection: A transition of activities from Legacy ORCA system to the next generation ORCA which included installation of new fare collection equipment, training, and back-end systems. Next Generation ORCA initially rolled out in 2022 with more enhancements and features, such as the ability to tap to pay with your phone provided in the future.

- FTA Joint Development (FTA interest in the property)
Cedar Crossing Transit Oriented Development/Affordable Housing: An all-affordable housing project that provides 254 housing units, including 91 two-and three-bedroom units for families, on 1.2 acres of land directly adjacent to the Roosevelt light rail station. The project was made possible in part by a Joint Development Agreement with the Federal Transit Administration. Bellwether Housing and Mercy Housing Northwest developed the project, which opened in June 2022. (FTA funding in the original property purchase and initial Roosevelt Station construction)

Ongoing Projects

Sound Transit is currently implementing the following noteworthy projects:

FTA Funded Link Light Rail projects:

- Federal Way Link Extension: A 7.8-mile light rail extension including three stations in Kent/Des Moines near Highline College, South 272nd Street and the Federal Way Transit Center. The three stations will add a total of 3,200 new spaces along the route. Open for revenue service in 2025/2026. (This is an FFGA project)
- Lynnwood Link Extension: An 8.5-mile extension of the Link Light Rail line into Snohomish County from Northgate (opened in 2021) to Lynnwood City Center with four stations serving Shoreline, Mountlake Terrace and downtown Lynnwood. When the extension opens, riders will enjoy fast, frequent and reliable service between south Snohomish County and the University of Washington, downtown Seattle, the Eastside, Sea-Tac Airport and more. Open for revenue service in Summer/Fall 2024. (This is an FFGA project)
- NE 130th Infill Station – The addition of a light rail station to the Lynnwood Link Extension at NE 130th Street in Seattle. The new station will serve a growing residential neighborhood between the Northgate and Shoreline South/148th stations. The NE 130th Street Infill Station is scheduled to open in 2026.
- Hilltop Tacoma Link Extension: This 2.4 mile extension will more than double the length of the Tacoma Link line, and add six new stations. The project also includes expansion of the Operations and Maintenance Facility located on East 25th Street to accommodate five new light rail vehicles. Scheduled completion date 2023. (This is a Small Starts project).
- East Link Extension: This 14-mile light rail extension adds 10 stops to the rail line, linking communities and centers in Mercer Island and Bellevue to downtown Seattle, SeaTac Airport, and the University of Washington. Open for revenue service in 2025.
- Downtown Redmond Link Extension: This 3.4-mile link extension adds two new light rail stations and serves the downtown residential and retail core in Redmond, providing access to downtown Seattle in 15 minutes. Currently in construction. Open for revenue service in 2025.
- Tacoma Dome Link Extension: This project will add 9.7 miles to the regional rail network, and includes four new stations and parking facilities, and connect Tacoma to other cities in the region as well as SeaTac Airport. Currently in planning phase.

- **West Seattle and Ballard Link Extensions:** The West Seattle & Ballard Link Extensions are voter-approved projects under the ST3 Plan. West Seattle segment includes 4.7 miles of light rail from downtown Seattle to West Seattle’s Junction neighborhood. It includes four light rail stations. The route will run on elevated and tunnel guideway with a new rail-only bridge over Duwamish River. The Ballard segment includes 7.1 miles of light rail from downtown Seattle to Ballard’s Market Street area. It includes nine light rail stations. The route will run through a new downtown Seattle rail-only tunnel, elevated and tunnel guideway, and a new crossing across Salmon Bay. This project currently doesn’t have FTA funds, however ST has entered the CIG process and received Project Development approval from the FTA in July 2022. ST is planning for an FFGA for this project.

Bus Rapid Transit (BRT) projects:

- **I-405 BRT – Vehicles and South Renton Transit Center:** This project will connect communities and centers along the East side of the Puget Sound, linking to the rail system. The project includes a new transit center in South Renton and 11 BRT stations. Revenue service anticipated 2027-2028.
- **SR 522/NE 145th Street BRT – Battery electric buses and charging infrastructure:** The project includes nine stations and an expanded transit center at UW-Bothell and will connect to Link light rail at Shoreline South/145th as well as to other transit service provided by Sound Transit, Community Transit and King County Metro. Currently in preliminary engineering. Open for revenue service in 2027-2028.

Sounder Commuter Rail projects:

- **Puyallup Station Parking and Access Improvements:** Improved access to South Sounder’s Puyallup Station for pedestrians, cyclists, transit riders and drivers. Improvements include a new 500-space parking garage. The project opened in March 2023.
- **Auburn Station Parking and Access Improvements:** This project includes a set of access improvements for passengers arriving at the station via a variety of modes. The project will add 535 new parking spaces in a new garage. The project is expected to be complete in 2026-2027.
- **Sumner Station Parking and Access Improvements:** This project will improve access to Sumner Station for riders, whether they arrive by walking, bicycling, transit or driving. The project includes construction of a garage adding approximately 500 new parking spaces, along with sidewalk and lighting enhancements. Scheduled to be complete in 2026-2027. (No FTA grant funds currently, but closed on a USDOT RRIF loan in May 2023).

Future Projects

Sound Transit plans to pursue the following noteworthy projects in the next three to five years:

- Everett Link Extension – add 16 miles of light rail and six new stations connecting Snohomish County residents to the regional light rail network. We are also studying an additional unfunded, provisional station in the planning process. The project will travel through the communities of Lynnwood, unincorporated Snohomish County and Everett. Currently in the alternatives development phase through 2026. ST anticipates seeking CIG funds, including a Full Funding Grant Agreement in the future. ST has an FTA TOD Pilot Planning grant related to this project that will help identify potential gaps or issues in policies, codes, and permitting processes in the three jurisdictions along the Everett Link light rail corridor.
- South Boeing Station Access Road, Link Infill Station – adds a new station with 300 parking spaces to the existing line near South Boeing Access Road in Tukwila. The project bridges the current 5.5-mile gap between Rainier Beach and Tukwila International Boulevard stations. ST has future year CMAQ funds programmed to this project as awarded through the MPO project selection process in 2022. Project development will begin in 2023.
- South Graham St, Link Infill Station –, adds a new street level light rail station near MLK & South Graham Street, between Columbia City and Othello stations. The station will increase light rail access in the Rainier Valley and serve the growing Hillman City neighborhood. Currently locally funded.
- Sounder South Capacity Expansion: King Street Station Platform Area Improvements: As part of the Sounder South Capacity Expansion program, ST is studying how to make King Street Station better for passengers and ready to serve more Sounder riders in the years ahead. ST is looking into adding more stairs and elevators, a concourse above the platform, and more. ST has \$7M 5307 funds for the SSCE program, of which a portion is being drawn down against the early engineering and environmental work of the King Street Station project.

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify the FTA of legal matters and additionally notify the U.S. Department of Transportation (US DOT) Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Legal.

2. Financial Management and Capacity

Basic Requirement: The recipient must have financial policies and procedures; an organizational structure that defines, assigns and delegates fiduciary authority; and financial management systems in place to manage, match, and charge only allowable costs to the award. The recipient must conduct required Single Audits, as required by 2 CFR part 200, and provide financial oversight of subrecipients.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Financial Management and Capacity.

3. Technical Capacity – Award Management

Basic Requirement: The recipient must report progress of projects in awards to the Federal Transit Administration (FTA) and close awards timely.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Technical Capacity – Award Management.

4. Technical Capacity – Program Management & Subrecipient Oversight

Basic Requirement: States must document and follow a public involvement process for the development of the long-range statewide transportation plan and State Transportation Improvement Program (STIP). Designated recipients of Sections 5310, 5311, and 5339 funds must develop and submit a State Management/ Program Management Plan to the FTA for approval. Recipients must enter into an agreement with each subrecipient, obtain required certifications from subrecipients, report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards, and ensure subrecipients comply with the terms of the award.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must be able to implement the Federal Transit Administration (FTA)-funded projects in accordance with the award application, the FTA Master Agreement, and applicable laws and regulations using sound management practices.

Finding: During this Triennial Review of Sound Transit, a deficiency was found with the FTA requirements for Technical Capacity – Project Management.

Deficiency Description:

Deficiency Code TC-PjM3-1: inadequate oversight of transit management contractors

During the review, Sound Transit did not provide documentation that it was providing oversight of the Link light rail service operated by King County Metro (KCM). In the RIR documents provided prior to the site visit, Sound Transit provided two documents, “Sound Transit Contractor Oversight Plan Sounder Commuter Rail, effective 9/9/2021”, and “Sound Transit ST Express Bus Operations Oversight Program, effective 12/13/2021”. During the site visit, documentation was provided by Sound Transit staff confirming that it was monitoring Sounder commuter rail and ST Express Bus Operations as provided in the oversight documents. During the site visit, documentation provided showed that there was insufficient oversight of the Link light rail and staff did identify past issues with staffing as a major reason for the problem. During the site visit, Sound Transit provided a document entitled “Sound Transit Link Operations Program Plan Rev 1, effective 1/23/2023”. Sound Transit did not provide documentation that it had implemented the provisions of the Program Plan.

Following the review, on May 15, 2023, Sound Transit met with FTA Region 10 and the review team to further discuss and present steps already taken to correct this deficiency. ST’s Director of Link Light Rail Maintenance, presented an oversight matrix and evidence of implementation of various activities Link is tracking to ensure proper oversight of ST’s light rail contracted service provider. FTA and the review team concurred during the meeting that this matrix satisfied compliance and would close the deficiency moving into the final report. A copy of the matrix was also provided to FTA and the review team.

This deficiency is now closed.

6. Transit Asset Management

Basic Requirement: Recipients must comply with 49 CFR part 625 to ensure public transportation providers develop and implement transit asset management (TAM) plans.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Transit Asset Management.

7. Satisfactory Continuing Control

Basic Requirement: The recipient must ensure that Federal Transit Administration (FTA)-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.

Finding: During this Triennial Review of Sound Transit, a deficiency was found with the FTA requirements for Satisfactory and Continuing Control.

Deficiency Description:

Deficiency Code SCC9-2, non-permitted use of equipment disposal proceeds

Since the last Triennial Review, Sound Transit disposed of a number of assets that were past their useful life. In each case, Sound Transit notified FTA and received FTA approval for the disposals. However, Sound Transit did not notify the FTA or return the FTA share when the net proceeds exceeded \$5,000. As shown in the table below, five assets generated net proceeds in excess of \$5,000.

Following the site visit, Sound Transit provided documentation that it placed the proceeds for all of the items in a restricted account to be used against a future FTA award. Based on the proceeds and the federal share, ST was only required to restrict \$12,497.24. Accounting records provided by ST showed that it actual restricted more than required (\$29,754) because on a few occasions it restricted the entire proceeds. Sound Transit has not yet applied the proceeds to any other awards.

Date	Item Description	Asset #	Net Proceeds	FAIN	Fed %
3/18/2020	2008 Chevy Pickup	11173	\$14,442.00	WA-03-0142	24.16%
3/18/2020	2007 Chevy Pickup	11168	\$5,976.00	WA-03-0142	24.16%
2/16/2021	2008 Ford F-350	11404	\$5,160.00	WA-03-0142	24.16%
9/1/2021	2008 Chevy 2500	11171	\$15,312.00	WA-03-0142	24.16%
9/1/2021	Ford E-350	11452	\$10,837.00	WA-03-0142	24.16%

Following the site visit, on May 19, 2023, Sound Transit, included the FTA share of \$12,497.24 resulting from these dispositions in its FY 2023 5337 High Intensity Fixed-Guideway (HIFG) award that is currently transmitted/ready for FTA review in TrAMS identified as grant 5656-23-5. The review team confirmed that the proceeds were correctly applied to the award.

This deficiency is now closed.

8. Maintenance

Basic Requirement: Recipients must keep federally-funded vehicles, equipment, and facilities in good operating condition. Recipients must keep Americans with Disabilities Act (ADA) accessibility features on all vehicles, equipment, and facilities in good operating order.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Maintenance.

9. Procurement

Basic Requirement: The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, and conform to applicable Federal law and the standards identified in 2 CFR Part 200. State recipients can use the state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as absolving a state from Federal requirements. For example, the FTA does not require each State DOT to have policies and procedures separate from the state education department.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Procurement.

10. Disadvantaged Business Enterprise (DBE)

Basic Requirement: Recipients must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of US Department of Transportation (US DOT)-assisted contracts. Recipients also must create a level playing field on which DBEs can compete fairly for US DOT-assisted contracts.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the US DOT requirements for DBE.

11. Title VI

Basic Requirement: The recipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Title VI.

12. Americans with Disabilities Act (ADA) – General

Basic Requirement: Titles II and III of the Americans with Disabilities Act of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: During this Triennial Review of Sound Transit, deficiencies were found with the US DOT requirements for ADA – General.

Deficiency Descriptions:

Deficiency Code ADA -GEN9-1: elevator service deficiency

During the review, Sound Transit did not provide documentation that it had any standard operating procedures (SOPs) regarding accommodating passengers when an elevator was out of service. Verbal discussions on the subject described situations that had the passenger being responsible for determining the trip solution as the result of an inoperative elevator and not Sound Transit.

In its response to the draft report, Sound Transit recognized the need to develop a comprehensive approach to accommodating passengers with disabilities who need elevator access at those times when elevator outages at a station are a barrier between the platform and street level. Procedures exist for each of our Sounder (commuter rail) stations with elevators that provide above-grade track crossings; examples are provided for the [Everett, Mukilteo and/or King Street Stations]. Sound Transit agreed to develop comparable procedures for each of our current Link light rail stations with elevators, as well as our two freeway stations served by ST Express commuter bus. Sound Transit stated that it will provide FTA with a timeline by September 30, 2023, for FTA review and concurrence to include the development and implementation details and schedule for these procedures.

Deficiency Code ADA-GEN13-1: Insufficient oversight of contracted service for ADA requirements

During the review, Sound Transit did not provide documentation that it had and was implementing procedures to monitor its Link light rail and express bus contractors for conformance with the ADA service provisions, e.g., monitoring transit employees.

On May 15, 2023, Sound Transit met with FTA and the review team to further discuss and present the steps ST takes to ensure oversight of contracted service for ADA requirements. During this meeting ST Link Operations staff provided an overview of its monitoring procedures in place and documentation of how those procedures are being implemented to ensure ST's transit partners are complying with ADA service provisions related to the service they operate for Sound Transit. Copies of those procedures and additional documentation were provided to the FTA. FTA and the review team concurred during the meeting that these procedures were sufficient, but that additional documentation was needed to verify that ST's procedures are being implemented. Sound Transit stated that it will provide this additional review documentation representing the inclusion of ADA compliance to the FTA by July 31st, 2023.

Corrective Actions and Schedules:

For the deficiency, ADA -GEN9-1, elevator service deficiency, by December 31, 2023, Sound Transit must submit to the FTA Office of Civil Rights documentation that it has implemented procedures to accommodate passengers when an elevator is out of service.

For the deficiency, ADA-GEN13-1: Insufficient oversight of contracted service for ADA requirements, by August 31, 2023, Sound Transit must submit to the FTA Office of Civil Rights procedures for ensuring that contractors and lessees comply with the ADA service provisions, along with evidence of implementation.

Note: All corrective actions for ADA deficiencies must be submitted to the FTA Office of the Civil Rights and the FTA Civil Rights Support email box, Nick Sun (Nicholas.Sun@dot.gov) and copy the FTA Civil Rights Support email box (FTACivilRightsSupport@dot.gov). Please style the subject line of the email when submitting corrective actions as follows: FY 23 CORTAP Review Corrective Actions – [Findings Code(s)] – [Recipient Name/Acronym + TrAMS ID].

13. ADA – Complementary Paratransit

Basic Requirement: Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system. “Comparability” is determined by 49 CFR 37.123-37.133. Requirements for complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

Finding: During this Triennial Review of Sound Transit, deficiencies were found with US DOT requirements for ADA – Complementary Paratransit.

Deficiency Descriptions:

Deficiency Code ADA-CPT1: failure to provide complementary paratransit

Sound Transit directly operated the Takoma Link light rail service and did not provide ADA complementary paratransit service. On its website, Sound Transit stated that Pierce Transit provided ADA complementary paratransit and had the following: “**ADA complementary paratransit service for Tacoma Link (downtown Tacoma)** Pierce Transit provides paratransit service for Tacoma Link light rail. To obtain eligibility information, contact Pierce Transit SHUTTLE Eligibility at 253-984-8216/TTY Relay 711. To schedule paratransit trips, call SHUTTLE - Reservations and Information at 253-581-8100/TTY Relay 711.” During the site visit, Sound Transit indicated that it had no formal relationship with Pierce Transit for the provision of the service. This is evidenced by the fact that the Tacoma Link light rail had free fares and the Pierce Transit ADA paratransit service charged \$1.75 for a trip on its SHUTTLE service.

In its response to the Draft Report, Sound Transit noted that it will submit to the FTA Office of Civil Rights a plan with milestones for implementing paratransit as a complement to its (Tacoma Link) fixed-route service according to the criteria described in 49 CFR Part 37, subpart F, no later than July 31st, 2023.

Deficiency Code: ADA-CPT7-1, insufficient oversight of contractors/other private entities providing ADA complementary paratransit

Sound Transit was not providing adequate oversight of King County Metro (KCM) for the provision of ADA complementary paratransit. During the review, Sound Transit provided a document entitled “King County Metro Access RideGuide, revised June 2020” that had information on personal care attendants (PCAs) and visitors that was not in conformance with the ADA requirements and also provided the KCM ADA paratransit application that required inappropriate information, i.e., age and sex. Sound Transit had not monitored these documents for compliance with the ADA complementary paratransit requirements.

Following the review, on April 28th, 2023, Sound Transit submitted to FTA and the review team a copy of its Paratransit Oversight Manual, 2022 Access Ride Guide and Paratransit Audit Procedure. On May 16, 2023, Sound Transit also submitted to the FTA and review team the “Paratransit Oversight Supplemental Documentation and Procedures” that provides further documentation of procedures and information ST is tracking and using to monitor and ensure that our transit contractors (KCM) are complying with ADA complementary paratransit requirements. Further actions already completed or underway include:

- Eligibility Application form will be modified to ensure clarity for the birth date question by June 30, 2023 (online and in print);
- Visitor Policy has been modified and will be submitted to FTA no later than June 30, 2023;
- PCA registration (modified from “approved” to “registered”) has been updated on the website and in all the digital materials already. New guides will be printed no later than September 30, 2023 and distributed thereafter; and,
- ST’s final Paratransit Audit Procedure is signed, a copy is included in the TR Shared File site. The first audit to take place in the Summer/Fall of 2023.

Sound Transit stated that it will provide documentation of these actions and Paratransit Audit results no later than September 30, 2023.

Corrective Actions and Schedule:

For the deficiency, ADA-CPT1-1, failure to provide complementary paratransit, by August 31, 2023, Sound Transit must submit to the FTA Office of Civil Rights a plan with milestones for implementing paratransit as a complement to its (Tacoma Link) fixed-route service according to the criteria described in 49 CFR Part 37, subpart F.

For the deficiency, ADA-CPT7-1, insufficient oversight of contractors/other private entities providing ADA complementary paratransit, by October 31, 2023, Sound Transit must submit to

the FTA Office of Civil Rights evidence of implementation of the oversight procedures, including but not limited to: eligibility criteria; PCA approval; and visitor policy.

Note: All corrective actions for ADA deficiencies must be submitted to the FTA Office of the Civil Rights and the FTA Civil Rights Support email box, Nick Sun (Nicholas.Sun@dot.gov) and copy the FTA Civil Rights Support email box (FTACivilRightsSupport@dot.gov). Please style the subject line of the email when submitting corrective actions as follows: FY 23 CORTAP Review Corrective Actions – [Findings Code(s)] – [Recipient Name/Acronym + TrAMS ID].

14. Equal Employment Opportunity

Basic Requirement: The recipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program or activity receiving Federal financial assistance under the Federal transit laws.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Equal Employment Opportunity.

15. School Bus

Basic Requirement: Recipients are prohibited from providing school bus service in competition with private school bus operators unless the service qualifies and is approved by the Federal Transit Administration (FTA) Administrator under an allowable exemption. Federally-funded equipment or facilities cannot be used to provide exclusive school bus service.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for School Bus.

16. Charter Bus

Basic Requirement: Recipients are prohibited from using the FTA-funded equipment and facilities to provide charter service that unfairly competes with private charter operators. Recipient may operate charter only when the service meets a specified exception defined in rule.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Charter Bus.

17. Drug Free Workplace Act

Basic Requirement: Recipients are required to maintain a drug free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug free awareness program.

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Drug-Free Workplace Act.

18. Drug and Alcohol Program

Basic Requirement: Recipients receiving Section 5307, 5309, 5311, or 5339 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

Finding: During this Triennial Review of Sound Transit, deficiencies were found with the FTA requirements for Drug and Alcohol Program.

Deficiency Description:

Deficiency Code DA1-1: drug and alcohol policy missing required element

Sound Transit has a Drug and Alcohol Program for its safety-sensitive employees. The policy, Tacoma Link Light Rail Substance Abuse Policy, was approved by Sound Transit's CEO on 8/3/2021. The policy contains all of the required elements except that it was not approved by the Board of Directors.

In its response to the draft report, Sound Transit stated that its Office of Labor Relations will gain ST Board approval for the Tacoma Link Substance Abuse Policy. Sound Transit stated that it will provide a copy of the ST Board adopted policy to FTA Region 10 no later than September 30, 2023.

Corrective Action and Schedule: For the deficiency, DA1-1, drug and alcohol policy missing required element, by August 31, 2023, Sound Transit must submit to the FTA regional office proof of adoption of the Tacoma Link Substance Abuse Policy (SAP) by the Sound Transit governing body.

19. Section 5307 Program Requirements

Basic Requirement: The recipient must participate in the transportation planning process in accordance with Federal Transit Administration (FTA) requirements and the metropolitan and statewide planning regulations.

Recipients shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

Recipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

For fixed-route service supported with Section 5307 assistance, fares charged seniors, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.

Finding: During this Triennial Review of Sound Transit, a deficiency was found with the FTA requirements for Section 5307 Program Requirements.

Deficiency Description:

Deficiency Code 5307:3-1: no written policy for public comment

Sound Transit did not have a written policy that described the public comment process on major service reductions. Sound Transit did have a written policy that described the public comment process for increases in the basic fare, as described in Motion No. M2004-53. The Sound Transit policy document provided in Resolution R2022-19 was established for when the agency conducted equity analyses as required by the FTA.

Sound Transit has a robust public engagement program for major service reductions and the agency has been very successful in engaging with communities, riders, stakeholders, and operational and jurisdictional partners to help inform the decisions of our Board of Directors to adopt recommended service changes or revisions, including reductions. By December 30, 2023, Sound Transit stated that it will complete and provide to the FTA a Board-approved written policy that describes the public comment process on implementing a major service reduction.

Corrective Action and Schedule: For the deficiency, 5307:3-1, no written policy for public comment, no later than January 31, 2024, Sound Transit must submit to the FTA regional office a written policy that describes the public comment process on implementing a major service reduction.

20. Section 5310 Program Requirements

Basic Requirement: Recipients must expend Section 5310 funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all subrecipient leases of Section 5310-funded vehicles. Leases of Section 5310-funded vehicles must include required terms and conditions. Either the recipient or subrecipient must hold title to the leased vehicles.

This section only applies to recipients that receive Section 5310 funds directly from the FTA; therefore, the related requirements are not applicable to the review of Sound Transit.

21. Section 5311 Program Requirements

Basic Requirement: States must expend Section 5311 funds on eligible projects to support rural public transportation services and intercity bus transportation.

This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the related requirements are not applicable to the review of Sound Transit.

22. Public Transportation Agency Safety Plan (PTASP)

Basic Requirement: Recipients must comply with the Public Transportation Agency Safety Plan (PTASP) regulation (49 CFR Part 673) to ensure public transportation providers develop and implement an Agency Safety Plan (ASP).

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Public Transportation Agency Safety Plan Requirements.

23. Cybersecurity

Basic Requirement: Recipients that operate rail fixed guideway public transportation systems must certify compliance with the requirements for establishing a cybersecurity process under 49 U.S.C. § 5323(v), a new subsection added by the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, § 7613 (Dec. 20, 2019).

Finding: During this Triennial Review of Sound Transit, no deficiencies were found with the FTA requirements for Cybersecurity Requirements.

V. Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	ND				
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	ND				
5. Technical Capacity – Project Management	D	TC-PjM3-1: Inadequate oversight of transit management contractors	Sound Transit must submit to the FTA regional office documentation of implementation of the Link Operations Program Plan v.1. Documentation should show that ST has conducted the scheduled weekly, monthly and ad hoc reviews described in the plan, for the next 90 days.		5/15/23
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	D	SCC9-2: Non-permitted use of equipment disposal proceeds	Sound Transit must work with the FTA regional office and provide an accounting for proceeds for FTA funded equipment that produced proceeds in excess of \$5,000.		5/19/23
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	D	ADA-GEN9-1: Elevator service deficiency	Sound Transit must submit to the FTA Office of Civil Rights documentation that it has implemented procedures to accommodate passengers when an elevator is out of service.	12/31/23	

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
	D	ADA-GEN13-1: Insufficient oversight of contracted service for ADA requirements	Sound Transit must submit to the FTA Office of Civil Rights procedures for ensuring that contractors and lessees comply with the ADA service provisions, along with evidence of implementation.	8/31/23	
13. ADA – Complementary Paratransit	D	ADA-CPT1-1: Failure to provide complementary paratransit	Sound Transit must submit to the FTA Office of Civil Rights a plan with milestones for implementing paratransit as a complement to its (Tacoma Link) fixed-route service according to the criteria described in 49 CFR Part 37, subpart F.	8/31/23	
	D	ADA-CPT7-1: Insufficient oversight of contractors/other private entities providing ADA complementary paratransit	Sound Transit must submit to the FTA Office of Civil Rights specific procedures for ensuring that contractors/partners comply with the ADA complementary paratransit requirements and evidence of implementation, including but not limited to: eligibility criteria; approval process; PCA approval; and visitor policy.	10/31/23	
14. Equal Employment Opportunity	ND				
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug-Free Workplace	ND				
18. Drug and Alcohol Program	D	DA1-1: Drug and Alcohol Policy missing required element	Sound Transit must submit to the FTA regional office proof of adoption of the Tacoma Link Substance Abuse Policy by the ST governing body.	8/31/23	
19. Section 5307 Program Requirements	D	5307-3-1: No written policy for public comment	Sound Transit must submit to the FTA regional office a written policy that describes the public comment process on implementing a major service reduction.	1/31/24	
20. Section 5310 Program Requirements	NA				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
21. Section 5311 Program Requirements	NA				
22. Public Transportation Agency Safety Plan	ND				
23. Cybersecurity	ND				

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are: Deficient (D)/Not Deficient (ND)/Not Applicable (NA)

VI. Attendees

Name	Title	Phone Number	E-mail Address
Central Puget Sound Regional Transit Authority			
April Alexander	Deputy Chief Procurement & Contracts Officer	206-398-5198	April.Alexander@soundtransit.org
Tyler Benson	Senior Grants Administrator	206-903-7372	Tyler.Benson@soundtransit.org
Robert Blackburn	Executive Operations Director	206-370-5674	Robert.Blackburn@soundtransit.org
Eric Braziel	Dep Director Facilities Maint Standards & Analytics	253-693-8860	Eric.Braziel@soundtransit.org
Robin Braziel	Executive Operations Director	206-903-7558	Robin.Braziel@soundtransit.org
Daniel Brouwer	Superintendent-Link Maintenance	206-553-3547	Daniel.Brouwer@soundtransit.org
John Carini	Deputy Director – Vertical Conveyances	206-553-3679	John.Carini@soundtransit.org
Jen Carr	Supervisor – Accounting		Jenn.Carr@soundtransit.org
Claire Chase	Chief of Staff – Portfolio Services Office	206-398-5266	Claire.Chase@soundtransit.org
Will Chevalier	Acting Director Link Light Rail Transportation	206-903-7727	Will.Chevalier@soundtransit.org
Kevin Chung	Chief of Staff – Finance	206-553-3560	Kevin.Chung@soundtransit.org
Jeff Clark	Deputy Executive Director – Financial Operations	206-553-3649	Jeff.Clark@soundtransit.org
Marcus Clark	Deputy Director – Passenger Services	206-398-5211	Marcus.Clark@soundtransit.org
Daphne Cross	Director – Inclusive Culture	206-903-7168	Daphne.Cross@soundtransit.org
Mary Cummings	Chief Administrative Officer	206-553-3755	Mary.Cummings@soundtransit.org
Cris Daniel	Accountant II	205-665-8395	Cris.Daniel@soundtransit.org
Maria Doucettperry	Chief Diversity, Equity & Inclusion Officer	206-665-8764	Maria.Doucettperry@soundtransit.org
Melissa Durel	Manager – Security & Safety Management System	206-903-7221	Melissa.Durel@soundtransit.org
Chris Elwell	Director – Project Labor Compliance	206-689-4992	Chris.Elwell@soundtransit.org
Joe Forgette	Director-Facilities Services Delivery-Operations	206-370-5521	Joe.Forgette@soundtransit.org
Melissa Fraser	Deputy Director – Accounting	206-553-3465	Melissa.Frasier@soundtransit.org
Wendy Gao	Senior Financial Analyst	206-689-4959	Wendy.Gao@soundtransit.org
Brandon Gatliff	Superintendent – Maintenance of Way	206-850-6985	Brandon.Gatliff@soundtransit.org
Beth Hamby	Senior Program Manager – Accessibility Services	206-717-9075	Beth.Hamby@soundtransit.org
John Henry	Chief Financial Officer	206-665-8400	John.Henry@soundtransit.org
Nicole Hill	Acting Chief of Staff – Civil Rights, Equity & Inclusion	206-553-3783	Nicole.Hill@soundtransit.org
Thatcher Imboden	Director - Community Development Office	206-398-5459	Thatcher.Imboden@soundtransit.org
Kirste Johnson	Senior Grants Administrator	206-276-3605	Kirste.Johnson@soundtransit.org
Briana Kass	Lead – Materials Technology & Services Contracts Analyst	206-553-3689	Briana.Kass@soundtransit.org
Kevin Kelly	Manager – Design & Construction Contracts	206-398-5182	Kevin.Kelly@soundtransit.org
Zahid Khan	Deputy Director – Enterprise Asset Management	206-553-3506	Zahid.Khan@soundtransit.org

Amanda Lanier	Director – Design & Construction Contracts	206-553-3850	Amanda.Lanier@soundtransit.org
Brandon Long	Manager – Commuter Rail Transportation	206-903-7184	Brandon.Long@soundtransit.org
Kathy Maloney	Accessibility Services Specialist	206-689-4904	Kathy.Maloney@soundtransit.org
George McGinn	Executive Operations Director – Light Rail	206-370-5590	George.McGinn@soundtransit.org
Ann McNeil	Chief Government & Community Relations Officer	206-398-5298	Ann.Snellmcneil@soundtransit.org
Brent Meacham	Director – Financial Reporting & Operations	206-689-4927	Brent.Meacham@soundtransit.org
Adrian Mejia	Program Manager – Title VI & Equity	206-717-9179	Adrian.Mejia@soundtransit.org
Presley Morrissey	Acting Director – Facilities Operations Support	206-553-3917	Presley.Morrissey@soundtransit.org
Monica Overby	Director – Grants	206-689-4979	Monica.Overby@soundtransit.org
Emilie Pelfrene	Senior Project Coordinator	206-903-7525	Emilie.Pelfrene@soundtransit.org
Christopher Quiocho	Senior Executive Assistant	206-398-5004	Christopher.Quiocho@soundtransit.org
Heather Rochelle	Senior Grant & Federal Loan Administrator	206-903-7334	Heather.Rochelle@soundtransit.org
Faith Roland	Director-Real Property	206- 499-9000	Faith.Roland@soundtransit.org
Vivian dela Rosa	Director – Enterprise Asset Management		Vivian.Delarosa@soundtransit.org
Amy Shatzkin	Director of Sustainability	206-903-7454	Amy.Shatzkin@soundtransit.org
Karl Shoemaker	Director – Link Light Rail Maintenance	206-717-9081	Karl.Shoemaker@soundtransit.org
Adam Strutynski	Director – Schedule Estimating Risk & Value Engineering	206-689-3308	Adam.Strutynski@soundtransit.org
Sarah Tan	Supervisor – Accounting	206-903-7239	Sarah.Tan@soundtransit.org
Mattie Tharpe	Legal Counsel	206-398-5397	Mattie.Tharpe@soundtransit.org
Julie Timm	Chief Executive Officer	206-398-5450	Julie.Timm@soundtransit.org
Carlos Trujillo	Manager – Vertical Conveyances	206-561-6456	Carlos.Trujillo@soundtransit.org
Dave Turissini	Deputy Director – Bus & Paratransit	206-398-5035	David.Turissini@soundtransit.org
Tim Wagner	Manager – Bus & Paratransit	206-398-5420	Tim.Wagner@soundtransit.org
Kelly Wan	Manager-Warranty & Transition-Central Link	206-636-8115	Kelly.Wan@soundtransit.org
Vivian Wei	Deputy Director – Transit Assets	206-903-7098	Vivian.Wei@soundtransit.org
Richard Williams	Manager – Commuter Rail Mechanical	206-370-5638	Richard.Williams@soundtransit.org
Kenneth Wilson	Grants Specialist	206-903-7006	Kenneth.Wilson@soundtransit.org
Lisa Wolterink	Deputy Executive Director – Fares, Grants & Revenue	206-689-3359	Lisa.Wolterink@soundtransit.org
Martin Young	Deputy Director – Commuter Rail Operations	206-398-5115	Martin.Young@soundtransit.org
Edson Zavala	Director – Economic Development	206-689-3166	Edson.Zavala@soundtransit.org
FTA Region 10			
Susan Fletcher	Acting Regional Administrator	206-220-7954	Susan.fletcher@dot.gov
Robert Buckley	Acting Deputy Regional Administrator	206-220-7954	Robert.buckley@dot.gov
Kristine Ziglar	Director, Financial Management & Program Oversight	206-220-7954	Kristine.ziglar@dot.gov
Christopher Macneith	Civil Rights Officer	206-220-7954	Christopher.macneith@dot.gov
Mark Stojak	Transportation Program Specialist	206-220-7954	Mark.stojak@dot.gov
Holmes & Company, LLC and Tuba Group			
David Crooks	Technical Program Manager	703-417-9410	dcrooks@tubagroup.com
John Potts	Lead Reviewer, Holmes	856-320-4662	jpotts@holmescpas.com
Maxine Marshall	Lead Reviewer, Holmes	856-320-4662	mmarshall@holmescpas.com
Melanie Potts	Associate Reviewer, Holmes	856-320-4662	mpotts@holmescpas.com
Danielle Holmes	Associate Reviewer, Holmes	856-320-4662	dholmes@holmescpas.com

VII. Appendices

No appendices included in this report.