

**East Link Extension Line  
Title VI Service & Fare Equity  
Analysis**

# Executive Summary

The opening of the East Link Extension Line light rail extension requires a Service and Fare Equity (SAFE) analysis because it is federally required for any New Start, Small Start, or other new fixed guideway capital project. The analysis is conducted to ensure the associated changes are beneficial and were selected without regard to race, color, or national origin.

Consistent with Sound Transit's *Disparate Impact and Disproportionate Burden* policy (Board Resolution No. R2022-19), a Title VI service equity analysis was completed with two levels of analysis. The first level is the individual route analysis, which evaluates each major service change on a route-by-route basis. The second is the systemwide analysis, which compares the benefits and impacts to Title VI protected and non-protected populations on all routes and services over multiple years.

The East Link Extension (2 Line) is a 14-mile Link light rail project that includes 10 stations from Seattle's International District to Judkins Park, across I-90 to Mercer Island and South Bellevue, and through Downtown Bellevue and the Bel-Red area to Redmond Technology Station (Figure 1). The East Link Extension was originally scheduled to open in mid-2023. However, unforeseen construction quality issues pushed back the schedule. Since construction issues only affect the western part of the 2 Line, the segment on the Eastside of Lake Washington between South Bellevue Station and Redmond Technology Station were completed by early 2024. By opening a portion of the line earlier, Sound Transit provided more immediate benefits to residents by opening rail access to essential jobs, educational institutions, healthcare facilities, and other important destinations. It also allowed for the earlier opening of the new Operations and Maintenance Facility East in Bellevue in preparation for future connections to the remainder of the system.



Figure 1: 2 Line, two new stations and the Sound Transit 1 Line network

The East Link Extension Line Title VI Service Equity Analysis examines the full East Link Extension. The Service Equity Analysis has two components, an individual route analysis and a systemwide analysis. The **individual route analysis** evaluates each service change associated with the East Link Extension Line on a route-by-route basis and found no adverse effects. The East Link Extension Line service change adds platform hours without taking away service from existing Sound Transit routes and improves both midday and weekend service. There are no changes to any local or regional service with the start of the East Link Extension Line. There is also no determination of disparate impact or disproportionate burden. Mitigations are not required.

Sound Transit's Title VI program requires that a **systemwide analysis** be conducted with each SAFE. While this is not a requirement of FTA Circular 4702.1B for capital projects, a systemwide analysis is conducted as part of this SAFE, in compliance with Sound Transit's Title VI program. The systemwide analysis reviews all changes to service made in the past two years and proposed for the

next year. As a new extension of the Link light rail system, the opening of the East Link Extension Line also requires a SAFE analysis to ensure the associated changes prove beneficial and were selected without regard to race, color, or national origin. The systemwide analysis is one element of this analysis. No findings were identified in the systemwide analysis. The analysis results show that the distribution of benefits for service additions exceeds 80% for protected populations and the distribution of impacts of service reductions does not exceed 20% for protected populations. Therefore, the systemwide analysis does not identify any disparate impacts or disproportionate burdens based on the cumulative service changes implemented between September 2023 and September 2026.

Table 1 summarizes the results of the Title VI equity analysis for the proposed major service changes with the opening of the East Link Extension Line. Additional details and explanation are included in the following document.

*Table 1: Summary of East Link Extension Line Title VI Service Equity Analysis*

Route	Service Change	Title VI-Protected Populations	Adverse Effects	Mitigations
<b>East Link Extension Line</b>	Extend service across I-90, adding new stations at Mercer Island, Judkins Park, and begin to serve all existing 1 Line stations between and including International District / Chinatown and Lynnwood City Center.	<ul style="list-style-type: none"> <li>• <b>Minority:</b> District average: 40.5%, Existing 2 Line service area: 45.3% New Line service area: 38.9%</li> <li>• <b>Low-Income:</b> ST District average: 19.8%, Existing 2 Line service area: 12% New 2 Line service Area: 16.1%</li> </ul>	<ul style="list-style-type: none"> <li>• No disparate impact</li> <li>• No disproportionate burden</li> </ul>	N/A

The East Link Extension Line does not result in any local or regional service restructuring. In anticipation of the opening of the East Link and Downtown Redmond Link Extensions, King County Metro and Sound Transit collaborated on the East Link Connections process to plan a coordinated bus structure on the Eastside. Since the East Link Extension's opening was delayed and many of these service changes depend on connections in Seattle, Bellevue, and Downtown Redmond, the implementation of the restructure has also been delayed. The East Link Extension Line SAFE does not include a fare change and equity analysis because the existing fare structure will not change.

Sound Transit sought public feedback on both the East Link Extension Line and the Title VI Analysis with several online and in person engagement tactics. An online landing page contained summary and detailed information about the project as well as a short survey with space for open-ended comments. The website and survey were promoted through multi-language ads on social media, community organization newsletters, virtual information sessions, and in-person Ambassador outreach events. The results of the public comment period showed a high level of support for the East Link Extension Line and appreciation for Sound Transit's work on the Title VI Analysis.

# Introduction

This Service and Fare Equity (SAFE) Analysis is being conducted for the East Link Extension Line segment of Sound Transit's Link light rail East Link Extension. Per FTA Circular 4702.1B, transit providers that will implement a New Starts fixed guideway capital project shall conduct a SAFE analysis. Sound Transit conducts a Title VI service equity analysis to ensure that changes to transit service are consistent with Title VI regulations defined by the FTA and policies defined by the Sound Transit Board of Directors. The FTA is responsible for ensuring that federally supported transit services and related benefits are distributed by applicants and recipients of FTA assistance in a manner consistent with Title VI, Section 601 of the Civil Rights Act of 1964, which states:

No person in the United States shall, on the grounds 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 Title VI analysis assesses potential impacts on minority and low-income communities associated with the proposed changes in the service plan. The analysis includes the service changes and associated equity analysis and the public outreach process for the East Link Extension Line and associated changes. The East Link Extension Line SAFE does not include a fare change and equity analysis because the existing fare structure will not change.

## Regulatory Framework

Chapter IV of the FTA's Circular 4702.1B further describes the requirements that FTA recipients must follow to ensure their programs, policies, and activities comply with Title VI requirements. The requirements set system-wide service standards and policies that apply to all fixed-route providers of public transportation service.

Title 49 CFR Section 21.5 (b)(2) specifies that a recipient shall not "utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color or national origin." Section 21.5 (b)(2) requires recipients to "take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color or national origin."

Transit providers that operate 50 or more fixed-route vehicles in peak service and are in an urbanized area (UZA) of 200,000 or more in population are required to meet all requirements of Chapter IV including setting service standards and policies, collecting, and reporting data, monitoring transit service, and evaluating fare and service changes. Additionally, FTA Circular 4702.1B specifically requires:

Transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project shall conduct a service and fare equity analysis. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations, whether the proposed changes to existing service rise to the level of "major service change" as defined by the transit provider. All proposed changes to parallel or connecting service will be examined. If the entity that builds the project is different from the transit provider that will operate the project, the transit provider operating the project shall conduct the analysis. The service equity analysis shall include a comparative analysis of service levels pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted

in tabular format and shall determine whether the service changes proposed (including both reductions and increases) due to the capital project will result in a disparate impact on minority populations. The transit provider shall also conduct a fare equity analysis for all fares that will change due to the capital project.

### **Transit Title VI Program Plan**

Sound Transit prepared the Title VI Program Plan in compliance with Title 49 CFR Section 21.9 (b) and with the FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients.” The purpose of the Title VI Program is to document the steps Sound Transit has taken and will take to ensure Sound Transit provides services without excluding or discriminating against individuals on the basis of race, color, or national origin. The Title VI Program Plan provides an outline of Sound Transit’s Title VI policies including what constitutes a major service change, the disparate impact and disproportionate burden policy. The Title VI Program Plan also includes the general requirements for Title VI and the requirements for fixed route transit providers. In 2022, the Sound Transit Board approved the Title VI Program Plan Update that was submitted to FTA.

### **National Environmental Policy Act**

Sound Transit, the Washington State Department of Transportation (WSDOT), and the Federal Transit Administration (FTA) published a Draft Environmental Impact Statement (DEIS) on the East Link Extension project in December 2008. After public comment and Sound Transit Board review, additional design modifications and alternatives were added and a Supplemental DEIS was published in November 2010. The Final Environmental Impact Statement (FEIS) was published in July 2011. It included a No Build Alternative, 24 build alternatives over five project segments including 19 station alternatives and four maintenance facility alternatives. The FEIS identified a preferred alternative, and the Sound Transit Board selected the project to be built in July 2011. The FTA issued a Record of Decision (ROD) in November 2011 as did the FHWA, which acted as a cooperating agency under NEPA.

The FEIS determined that the No-Build Alternative would constrain transportation options, leading to more traffic congestion where higher density is planned or causing less dense, more widespread development patterns. Increased congestion could also negatively impact the quality of life for study area residents and hinder future economic development in the area. Additionally, the benefits of the project such as regional air and water quality resulting from reduced vehicle miles traveled, retrofitting of existing stormwater handling systems and reduced pollutant loading into study area streams and Lake Washington would also not be realized with the No-Build Alternative.

Due to the highly urbanized nature of the East Link study area, impacts on natural resources were determined to be small and most impacts were related to the built environment. Project-wide impacts before mitigation included property acquisition, some resulting in business and employee relocation, removal of parklands, and some losses in wetlands. The FEIS determined East Link operations may also adversely affect levels of service at traffic intersections. Mitigation was developed for many of the adverse impacts identified on both natural resources and the built environment and all the alternatives incorporated impact avoidance and minimization measures.

Although construction would be temporary, the FEIS estimated the duration of civil construction on a light rail project could be between 2 and 5 years on any given portion of the route and traffic and access may be adversely affected, which could affect adjacent businesses and residents. The FEIS concluded that light rail construction could temporarily impact the historic Winters House or change the setting for the potential Surrey Downs historic district. Construction would also result in dust, noise, and vibration, lower visual quality around the construction site, temporary impacts on

wetlands and increased sediment loads in fish-bearing streams. Many parks would be used or affected during construction, but Sound Transit committed to mitigating adverse impacts or restoring parklands as needed.

For impacts that the project alternatives might not be able to fully minimize or avoid, the FEIS identified mitigation measures that could be implemented for impacts related to wetlands, noise and vibration, visual quality, historic resources, parks, and transportation. A preliminary list of mitigation commitments was developed for the Preferred Alternative and included in Appendix I of the FEIS and a Memorandum of Agreement documenting mitigation for impacts to archaeological and historic resources. The NEPA Record of Decision (ROD) included a list of all committed mitigation measures for the project to be built. The FEIS determined that overall, the East Link Project would result in impacts that would affect all populations to the same degree. Most impacts associated with the East Link Extension would be effectively mitigated, and the remaining impacts would be limited in scope and/or duration.

The East Link Extension would have several beneficial effects, including improved access to transit; a safer, more reliable, and more efficient transportation system; improved mobility through the project vicinity; transit travel time savings; improved accessibility to employment; and extended transit service hours.

Sound Transit published several State Environmental Policy Act (SEPA) Addenda to the FEIS, dated 2013, 2016, 2017 and 2018. The addenda addressed potential refinements developed during final design of the East Link Extension and new project-related environmental information. The addenda determined that potential refinements to the project would not substantially change the analysis of significant impacts and alternatives in the existing environmental documents and no new significant environmental impacts would result, and no supplemental EIS was required.

### **The Central Puget Sound Transit Context**

As a regional transit provider, Sound Transit offers regional connections service between major population and employment centers in King, Pierce, and Snohomish counties. Sound Transit's district stretches 1,080 square miles and serves about three million people or 40% of the state's population. Sound Transit works closely with local transit agencies that provide service in the Sound Transit district. Metro is the largest of these partner agencies, serves Washington State's most populous county and has a service area of approximately 2 million. Snohomish County's Community Transit has a service area population of approximately 570,000; Pierce County's Pierce Transit has a service area population of approximately 560,000. Operating partners provide local service to their respective counties and express service to transit hubs within King County.

# East Link & 2025 Planning Context

## East Link Extension Planning Context

Fourteen miles long, the East Link Extension includes 10 stations from Seattle's International District to Judkins Park, across I-90 to Mercer Island and South Bellevue, and through downtown Bellevue and the Bel-Red area to Redmond Technology Station (Figure 2). The original timeline had the extension open in mid-2023. In the summer and fall of 2022, the East Link opening was delayed due to construction quality issues. Sound Transit is now reviewing the opportunity to open a 14-mile segment of the East Link Extension between International District/Chinatown and South Bellevue Station.



Figure 2: 2 Line, two new stations and the Sound Transit 1 Line network

# ***Policies and Definitions***

The section below describes Sound Transit's approved policies for conducting and identifying major service changes, as well as for assessing their impacts on Title VI populations to ensure that changes to transit service are consistent with the Civil Rights Act of 1964, DOT Title VI regulations, FTA 4702.1B, and policies defined by the Sound Transit Board of Directors.

The FTA is responsible for ensuring that federally-supported transit services and related benefits are distributed by recipients of FTA assistance in a manner consistent with Title VI, Section 601 of the Civil Rights Act of 1964, which states: No person in the United States shall, on the grounds 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.

**Disparate impact:** A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin pursuant to FTA guidelines.

**Disproportionate burden:** A policy or practice that disproportionately affects low-income populations more than non-low-income populations pursuant to FTA guidelines.

**Low-income population:** A population whose household income is at or below the poverty guidelines set by the Department of Health and Human Services level utilized by the regional transit fare program to determine low-income reduced fare eligibility.

**Minority population:** A population who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino and/or Native Hawaiian/Pacific Islander.

## **Major Service Change**

Any single change in service on an individual bus or rail route that would add or eliminate more than 25 percent of the route's weekly revenue service hours, permanently move the location of a bus stop by more than a quarter mile or rail station by more than a half mile and/or close or eliminate a bus stop or rail station without a replacement of any kind within a quarter mile for bus stops or a half mile for rail stations. A major service change excludes:

- Replacement of an existing transit service by a different route, mode or contractor providing a service with the same headways, fare, transfer options, span of service and stops, so long as an analysis is completed that provides evidence that the replacement level service is equal to or better than the existing Sound Transit service; or
- Changes to route numbers without any other changes to the route characteristics; or
- Changes to service or new services considered temporary, where temporary is defined as less than 12 months.

The agency conducts an equity analysis of all proposed major service changes to determine adverse effects and equitable distribution of benefits. For major service changes:

- **Adverse effects** are a geographical or time-based reduction in service, including span of service changes, frequency of service changes, route segment elimination and rerouting or route elimination.
- **Benefits** are a geographical or time-based addition of service, including an increase in span, frequency, and service coverage.

## Changes to a Single Line or Route

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).

## Systemwide Service Reductions

When a systemwide potential adverse effect occurs due to major service changes on more than one line or route, the agency determines if the collective service reductions create a disparate impact or disproportionate burden by comparing the percentage of the service area's minority or low-income population adversely affected by the major service reductions to the percentage of the district's non-minority or non-low-income population adversely affected.

1. If the percentage of the minority or low-income population adversely affected is 20 percent or greater than the percentage of the non-minority or non-low-income population adversely affected (e.g., 12 percent or more of the minority population is adversely affected while 10 percent or less of the non-minority population is adversely affected), the reductions create a disparate impact or disproportionate burden.
2. Collective service reductions include both service reductions under consideration for the next year and implemented service reductions in the past two years, both major and minor service changes.

## Systemwide Service Additions

When a systemwide potential adverse effect occurs due to major service changes on more than one line or route, the agency determines if the collective service additions create a disparate impact or disproportionate burden by comparing the percentage of the minority or low-income population who benefit from the major service additions to the percentage of the district's non-minority or non-low-income population who benefits from the service additions.

1. If the percentage of the minority or low-income population benefited is 80 percent or less than the percentage of the non-minority or non-low-income population benefited (e.g., eight percent or less of the minority population benefits while 10 percent or more of the non-minority population benefits), the changes create a disparate impact or disproportionate burden.
2. Collective service additions include both service additions under consideration for the next year and implemented service additions in the past two years, both major and minor service changes.

## Public Involvement Policy

Sound Transit conducts public outreach regarding fare changes and major service changes as consistent with Sound Transit's newly adopted Public Comment on Fare Changes and Major Service Changes Policy (Board Resolution No. R2022-19-34).

Sound Transit implements permanent fare changes and major service changes only after providing the public with reasonable opportunity to provide formal comment. All public feedback gathered

about a proposed fare change or major service change is shared with the Board before any final decisions or actions.

## Definitions and Data Analysis

The following sections describe the data definitions and methodologies used by Sound Transit to develop estimates for Title VI populations within the Sound Transit service area.

### Demographic Analysis Methodology and Title VI Data Definitions

Sound Transit uses census demographic data to identify Title VI communities (minority, low-income and limited-English proficiency) for service equity analysis and calculates the systemwide or mode-specific average representation of these communities within the general population. Only minority or low-income status are used to determine if a disparate impact or disproportionate burden must be mitigated or analyzed. However, identifying LEP residents helps Sound Transit to ensure that outreach efforts reach diverse customers. Sound Transit uses the 2023 designated census tracts as the geographic basis for assessing the Title VI populations, and the most recent five-year demographic estimates available from American Community Survey (ACS). The following sections describe the methodology for identifying each Title VI population for the annual service equity analysis.

### Service Area Methodology

Most transit agencies in the United States define their service area as a buffered distance around each of their transit routes. Given the unique service characteristics of Sound Transit service – limited stops connecting regional urban and employment centers – the agency defines its service area based on a radial distance from each transit stop, rather than the transit route alignment. The radial distance varies depending on the type of stop (see Table 2).

*Table 2: Service area definitions*

Stop Type	Service Area in Miles
Bus stop without parking	0.5
Rail stops without parking	1.0
Bus facility with parking	2.5
Rail station with parking	5

### Sound Transit Title VI Population Estimates

Using the demographic analysis and Title VI definitions previously outlined in this section, percentages for Title VI populations for the Sound Transit service area are identified by census tract and the district<sup>1</sup> overall. Table 3 shows Title VI population averages for the Sound Transit service area using the American Community Survey five-year estimates 2023 dataset. Minority and low-income averages serve as a comparison in the service change analysis to determine if mitigation must be considered, while LEP averages help to advise the outreach strategy. The maps below show census tracts with minority and low-income populations above the Sound Transit district average and LEP.

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<sup>1</sup> The Sound Transit District is the geographic area that contributes tax revenue to fund Sound Transit services while the Sound Transit service area is defined by set radial distances from Sound Transit stops. While these two geographies mostly overlap, there are parts of the service area that extend beyond the District boundaries and parts of the District that are not served by transit stops.

Table 3: Sound Transit District population

Title VI-Protected Populations	Percentage of District Populations
Minority	40.5%
Low Income	19.8%
Limited English Proficiency	10.3%

The maps below (Figure 3-8) show the Sound Transit stops and census tracts in the Sound Transit district and Sound Transit service area that have above-average percentages of minority, low-income and limited English proficiency (LEP) populations. The individual and systemwide service equity analyses use the **Sound Transit district averages for each protected population**, not the transit service areas, to compare the percentage of these populations in the individual route's service areas. The transit service area buffer illustrates how Sound Transit service and stops are sometimes outside of the district area.

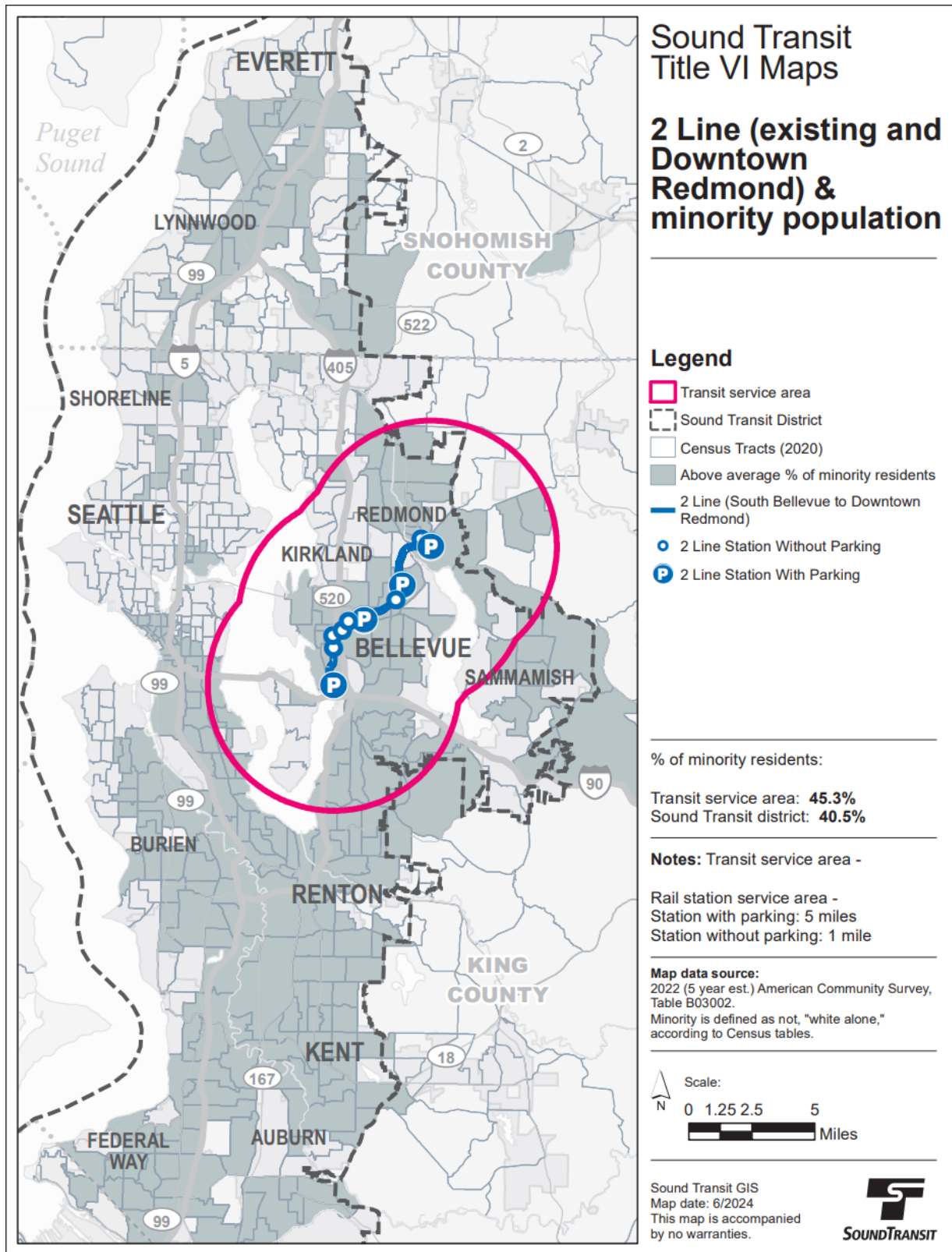


Figure 3: Map of Title VI Minority population of the existing 2 Line, prior to being extended across I-90

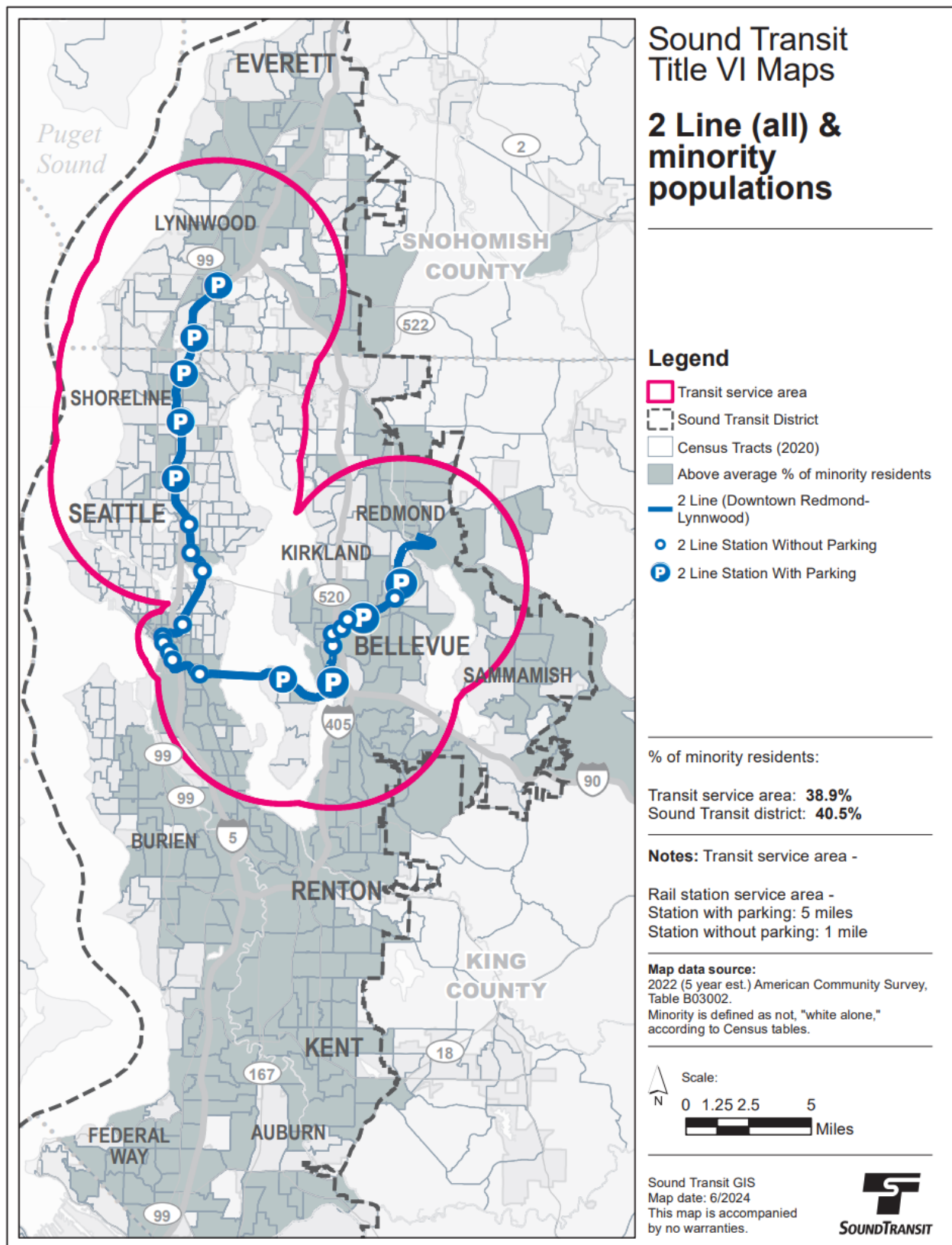


Figure 4: Map of Title VI Minority population for the 2 Line after being extended across I-90

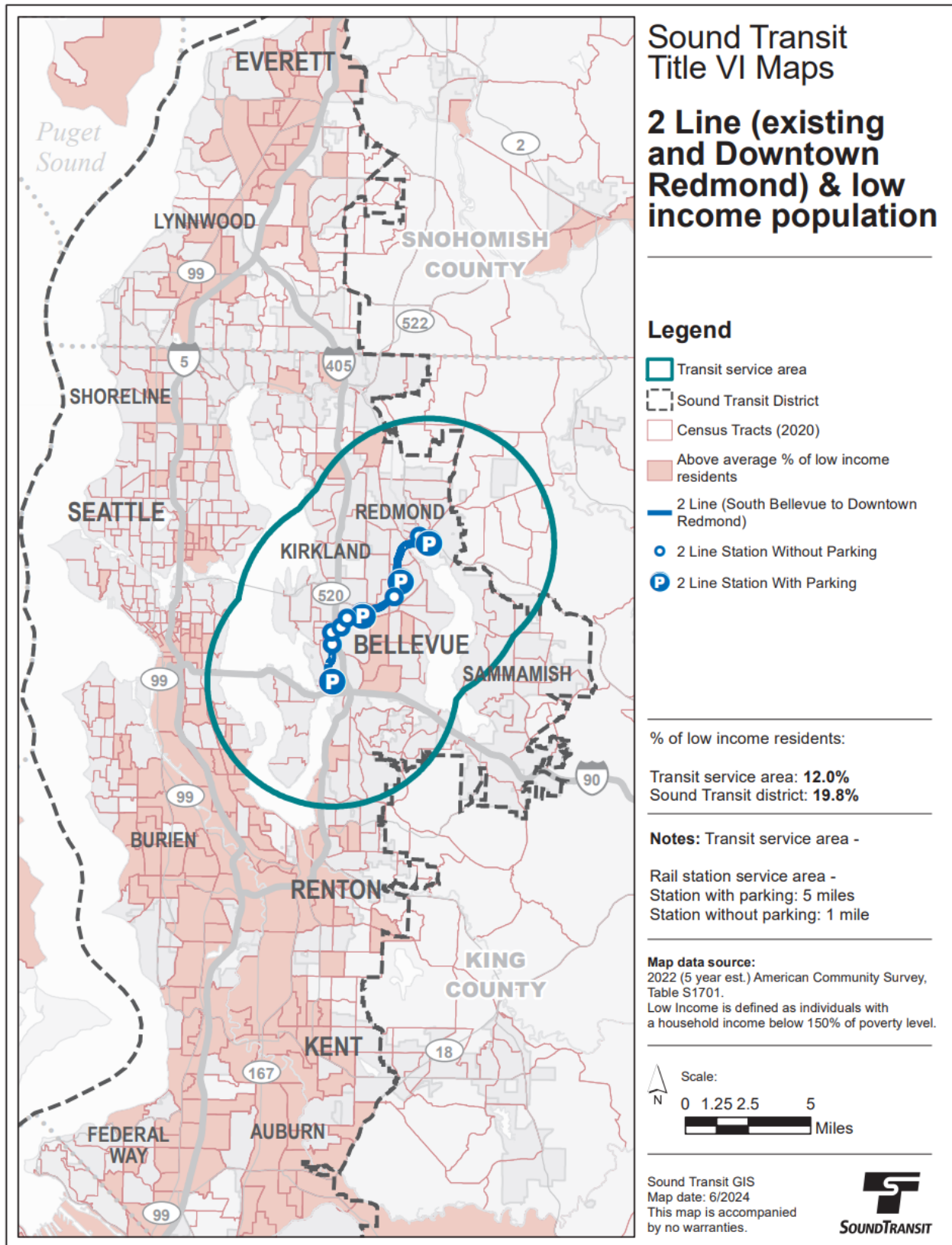


Figure 5: Map of Title VI Low Income population for the existing 2 Line, prior to being extended across I-90

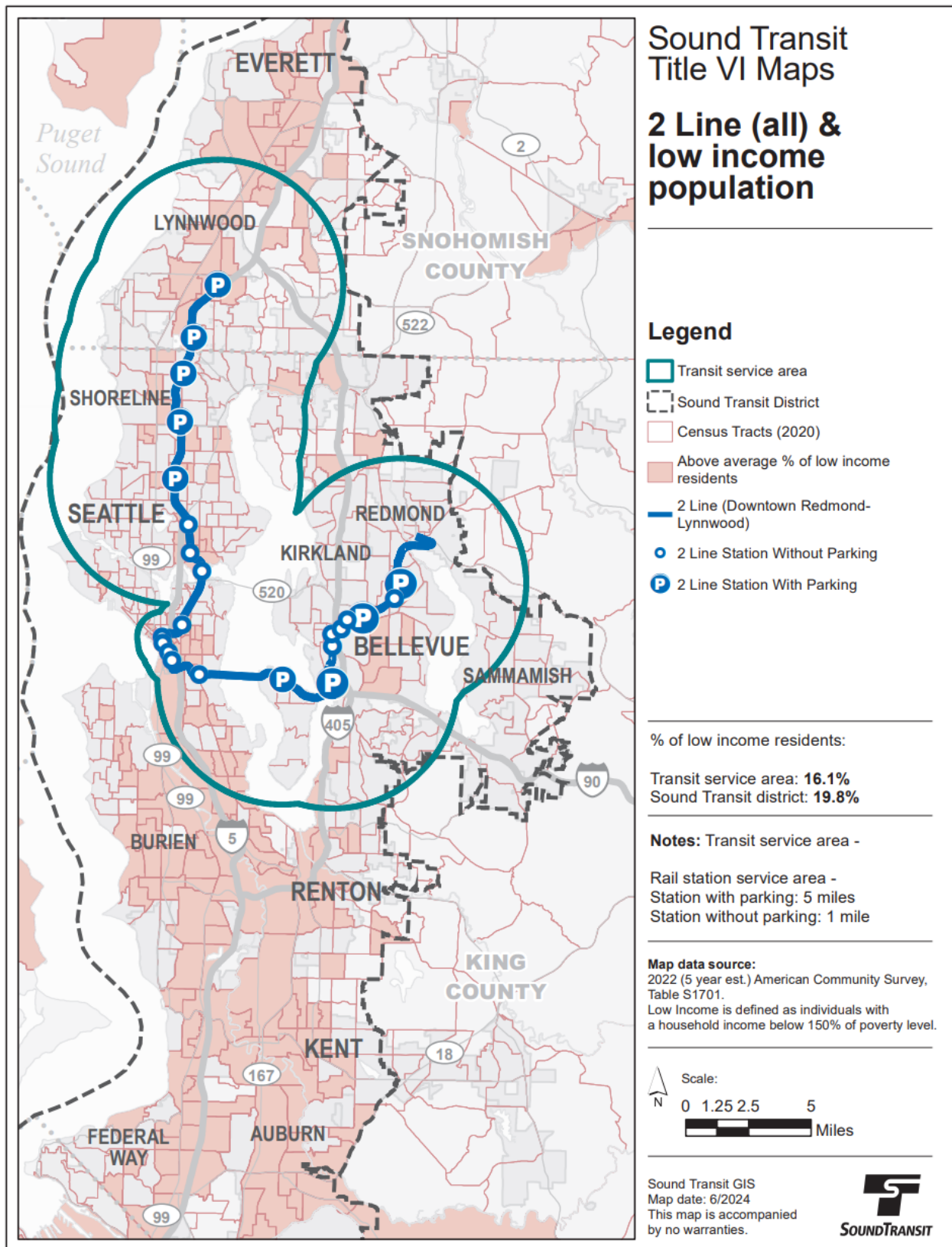


Figure 6: Map of Title VI Low Income population for the existing 2 Line after being extended across I-90

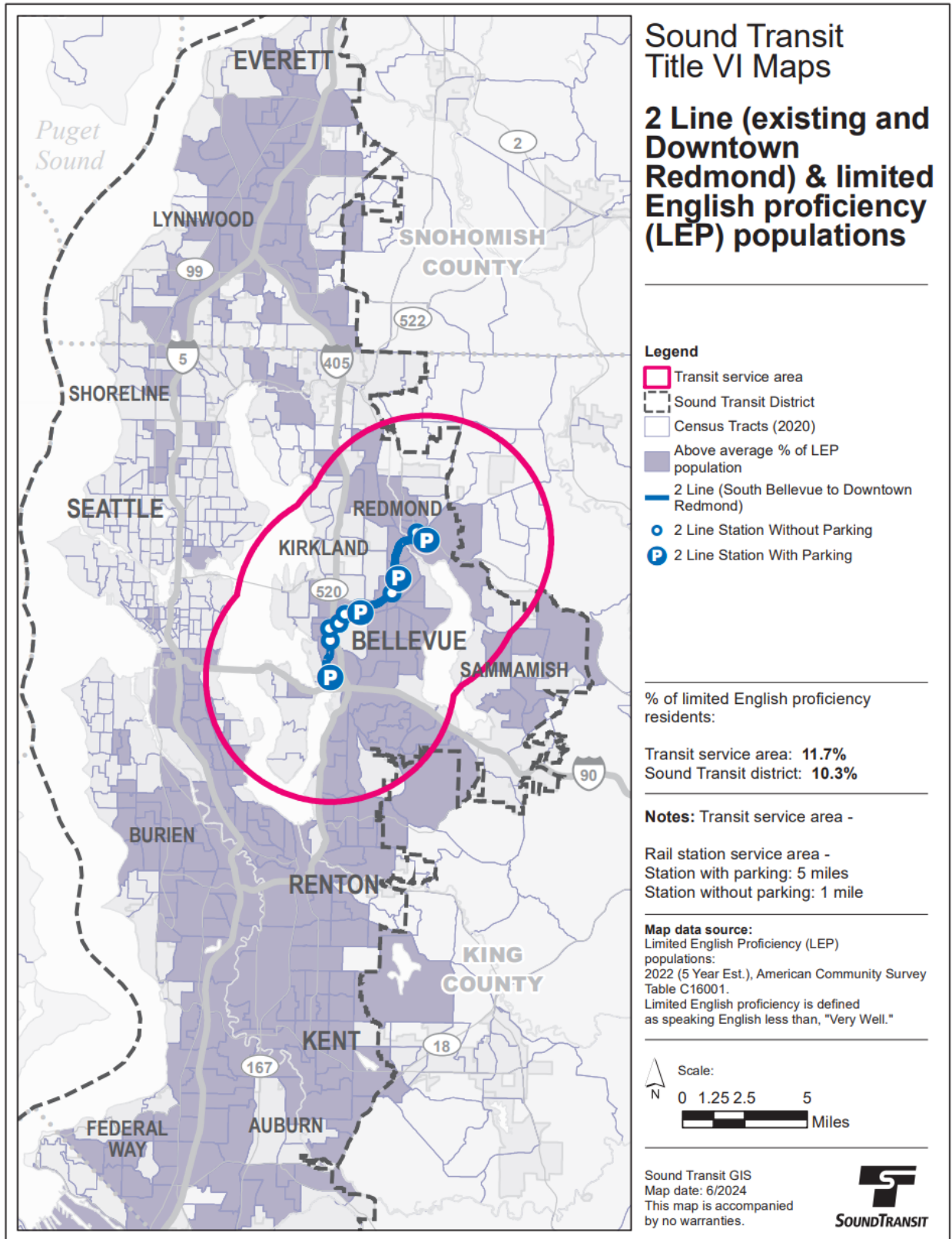


Figure 7: Map of Title VI Limited English Proficiency (LEP) population of the 2 Line prior to being extended across I-90

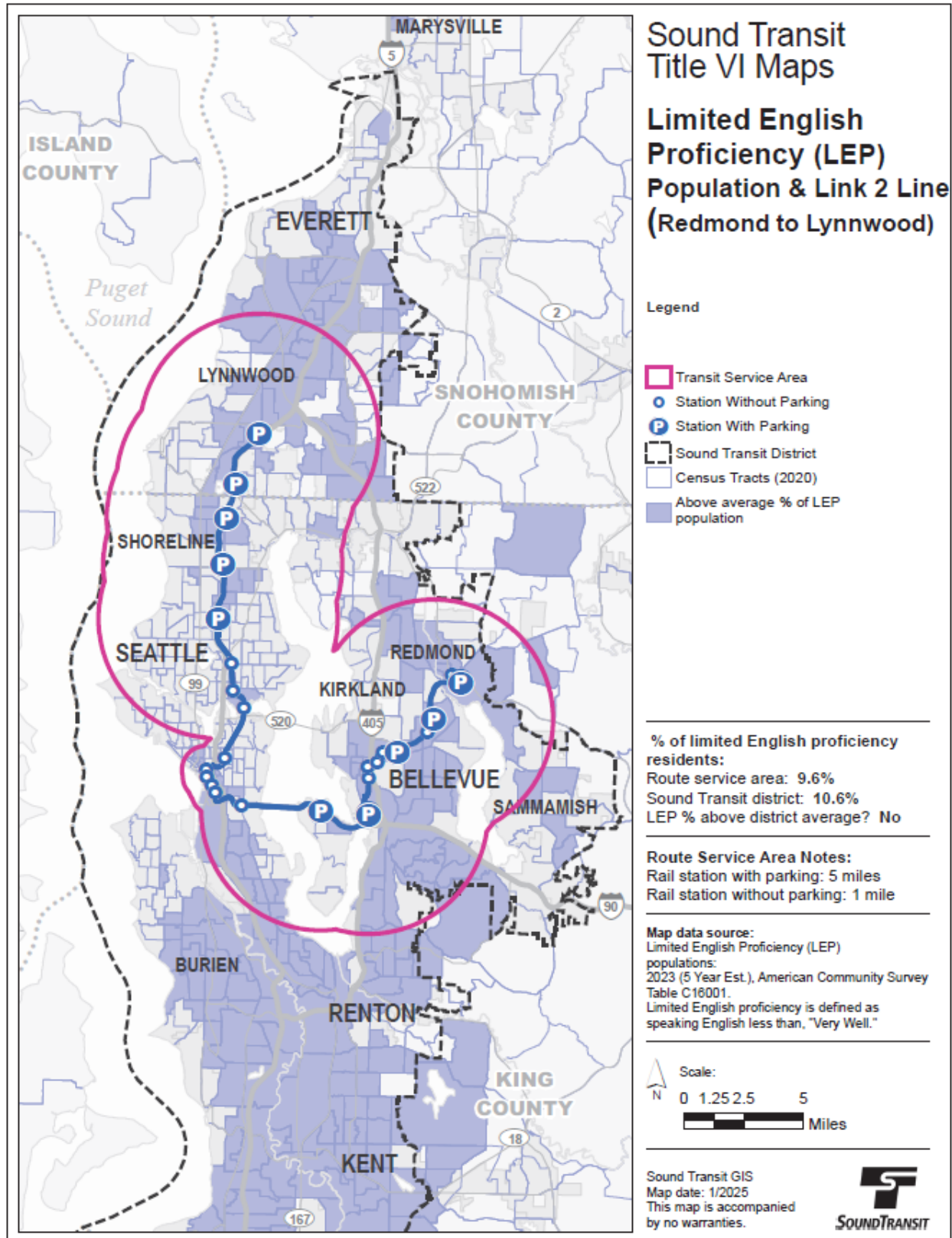


Figure 8: Map of Title VI Limited English Proficiency (LEP) population of the 2 Line after being extended across I-90

## Title VI-Protected Populations by Route

Table 4 (below) displays the Title VI-protected populations by route for each of Sound Transit's service types. Title VI-protected routes are highlighted when they exceed five percent of the district Title VI population average, or the policy threshold used to evaluate potential major service changes. Sound Service Area Title VI routes and population data are available in the appendix.

*Note about Low-Income Population Percentage:* Sound Transit previously defined household income below 150 percent poverty level and low-income. In 2022, the agency updated the definition of low-income to a household income below 200 percent of the poverty level. The updated 200 percent is in line with the evaluation ORCA (region fare payment) uses to evaluate households that qualify for reduced fare payment.

Table 4: Title VI protected population by route

Route	Minority Population	Low-Income Population	Limited English Proficiency (LEP)
<b>Express Bus</b>			
510	41.0%	22.9%	11.8%
512	38.0%	19.6%	10.8%
513	43.9%	22.1%	14.7%
522	41.3%	19.7%	10.7%
532	32.3%	14.0%	7.5%
535	43.4%	19.8%	13.4%
542	41.0%	15.0%	11.4%
545	49.5%	15.1%	12.3%
550	49.3%	15.4%	11.5%
554	50.5%	17.4%	12.5%
556	49.5%	14.5%	11.6%
560	47.3%	13.9%	11.5%
566	53.6%	22.7%	17.8%
574	55.2%	21.6%	16.8%
577	53.7%	31.2%	14.6%
578	54.0%	26.9%	14.1%
580	45.6%	24.4%	12.2%
586	27.9%	18.9%	5.7%
590	50.6%	31.4%	12.9%
592	46.1%	26.9%	8.4%
594	50.2%	29.8%	9.8%
595	48.2%	29.8%	9.5%
596	37.0%	22.2%	6.1%
<b>Commuter Rail</b>			
Souder N Line	37.5%	22.4%	10.4%
Souder S Line	48.6%	26.3%	12.3%
<b>Light Rail</b>			
1 Line	43.5%	20.1%	11.2%
Link 2 (Downtown Redmond plus Starter Line)	47.5%	12.2%	11.9%
Link 2 (Starter Line)	47.8%	12.3%	12.2%

Route	Minority Population	Low-Income Population	Limited English Proficiency (LEP)
Link 2 (Redmond to Lynnwood)	40.7%	15.9%	9.6%
<b>Streetcar</b>			
T Line	42.0%	25.4%	8.5%
<b>District Average</b>	<b>40.5%</b>	<b>19.8%</b>	<b>10.3%</b>

# Public Outreach & Involvement

The mission of Sound Transit's Engagement and Outreach division is to provide high quality communications that build trust and connect Sound Transit with its customers, stakeholders, and the public. Sound Transit wants to preserve and enhance its reputation and retain and gain riders. The goals and objectives for Sound Transit Engagement include:

- Provide transparent communication progress and potential impacts so there are no surprises.
- Make information easy to access, easy to understand, communicated in multiple formats, and able to reach a large and diverse audience.
- Foster meaningful engagement, through two-way conversations that have broad participation with diverse audiences.
- Strive to connect with often overlooked groups.
- Use the public's input to make informed decisions.
- Resolve impacts created by ST projects and services.
- Make staff easily accessible to allow problems to be solved quickly and at the lowest level.

Sound Transit is committed to fulfilling these goals and objectives and living our values as we launch into the East Link project. Since 2006 when the project kicked off, Sound Transit has planned for, designed, and implemented a robust public engagement and involvement process. The process covered all the engagement through all phases of the project including planning, environmental review, final design, and construction. Each phase of engagement had a specific objective and purpose to inform the public, ask questions of the public and collect feedback that would help inform decisions that would affect the project to be built.

Project Phase	Engagement Objective
<b>Project Scoping</b>	Inform residents about Sound Transit's intent to prepare an Environmental Impact Statement (EIS) for East Link and provide opportunities to share preferences about the scope of the EIS.
<b>Conceptual Development of Alternatives</b>	Collaborate with the community about design ideas and priorities for East Link Extension route and station alternatives.
<b>DRAFT Environmental Impact Statement (DEIS)</b>	Provide information to, and collect comments from, the public and agencies about the environmental consequences of building and operating the East Link Extension project.
<b>FINAL Environmental Impact Statement (FEIS)</b>	Provide information to the public about alternatives and their potential impacts, including environmental information and measures to avoid, minimize and mitigate impacts. Respond to comments submitted from the public and agencies during the Draft EIS and Supplemental Draft EIS comment periods.
<b>Cost Savings/Collaborative Design Process</b>	Through a Memorandum of Understanding (MOU) executed on November 15, 2011, Sound Transit and the City of Bellevue establish a

	collaborative framework to gather input on cost savings.
<b>Preferred Alternatives – Neighborhood Focused Engagement</b>	Share information about the East Link Extension preliminary engineering design phase with communities and invite input on the light rail alignment and station locations.
<b>Final Design</b>	Educate the community on the final design process, including an overview of the project schedule, start, safety and security, pedestrian and bicycle access, and construction sequencing and mitigation.
<b>Construction</b>	Serve as the main point of contact for the community to provide information on upcoming construction activities, be the voice of the community and advocate solutions to mitigations with the construction management teams and be transparent and responsive to community concerns and issues.
<b>Transition to Operations</b>	Once construction is complete, change the message to the community to make them aware of safety engagement, bus/rail integration, How to Ride, fare information and other passenger facing communications.

## Public Outreach and Involvement Summary

Passengers began riding Link light rail between downtown Seattle and Sea-Tac Airport in 2009, with expansions to Capitol Hill, the University of Washington, and Angle Lake in 2016. Ten years earlier, Sound Transit began planning the East Link Extension, a 14-mile light rail line critical to the regional transit system. In 2008, Sound Transit started work on the Draft Environmental Impact Statement (DEIS), publishing it in 2009. After reviewing 822 public comments, the Final Environmental Impact Statement (FEIS) was published in July 2011. That same month, the Sound Transit Board selected the project's route, stations, and a downtown Bellevue tunnel.

In November 2011, Sound Transit and Bellevue executed a Memorandum of Understanding (MOU), establishing a framework for cost-saving ideas and community input. Three open houses and stakeholder briefings gathered 571 public comments, influencing project refinements. Between 2012 and 2014, twelve public meetings across multiple cities educated communities on the final design process, covering project schedules, pedestrian and bicycle access, and construction sequencing. By late 2014, final design was complete, and Sound Transit coordinated with Mercer Island and Bellevue to finalize agreements ensuring collaboration during construction.

Construction began in 2018. Sound Transit engaged communities through large public events, fairs, and festivals, sharing project updates and answering questions. They had a consistent presence at Mercer Island and Bellevue farmers markets, the Bellevue Arts Fair, and other local events.

In November 2021, the project moved into safety testing and pre-operations. Sound Transit Community Engagement partnered with Bellevue, transportation groups, and businesses to promote rail safety and held virtual office hours for community engagement. In late 2022, Sound Transit

announced service delays, shifting focus to outreach for the East Link starter line, anticipated to open in spring 2024, with full project completion in 2025.

Sound Transit's Community Engagement team played a key role in keeping project neighbors informed and involved. During the alternatives analysis, they facilitated four public meetings, gathering 300 scoping comments. Throughout environmental review, 28 open houses and workshops resulted in 1,887 public comments on 24 project alternatives. During design, open houses and stakeholder briefings provided opportunities for input on cost-saving ideas, with 575 attendees contributing 571 comments.

During construction, Sound Transit staff engaged over 10,000 community members at events. When the COVID-19 pandemic halted in-person engagement, they adapted by creating virtual outreach options. A virtual booth launched in late 2020 attracted over 10,000 unique page views and 115 survey responses. Virtual office hours provided updates on project status, safety testing, and transit services, extending into early 2022 due to high participation.

To reach diverse communities, Sound Transit partnered with local organizations to distribute translated materials in multiple languages. They collaborated with Bellevue to produce a light rail safety video in seven languages.

Throughout the project, Sound Transit ensured accessibility by translating all public-facing materials into Korean, Russian, Somali, Spanish, and Vietnamese. Their efforts maintained strong community engagement despite challenges, fostering transparency and collaboration as East Link nears completion.

# Individual Route Analysis of Major Service Changes

**Note:** All service proposals are subject to change and require board approval.

The **individual route analysis** evaluates each major service change on a route-by-route basis, **found no adverse effects** (Table 6). There are no changes to parallel or connecting bus routes, so the only analysis conducted was on the East Link Extension Line. The East Link Extension Line service change adds revenue hours without taking away service from existing Sound Transit routes and improves all-day service. There is also no determination of disparate impact or disproportionate burden. Mitigations are also not required.

*Table 5: Service change analysis summary*

Route	Proposed Change	Type of Change	Adverse Effect	Disparate Impact	Disproportionate Burden
East Link Extension Line	Extend service across I-90, adding new stations at Mercer Island, Judkins Park, and begin to serve all existing 1 Line stations between and including International District / Chinatown and Lynnwood City Center.	Major	No	No	No

## Methodology

When a proposed major service change to a single line or route creates an 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).

If a service area changes with the service change (stations or stops were added or removed, etc.), the analysis compares the District average to the protected populations' percentage for the service area before and after the service change.

## Identifying Major Service Changes

A major service change is defined as: Any single change in service on an individual bus or rail route that would add or eliminate more than 25 percent of the route's weekly revenue service hours, permanently move the location of a bus stop by more than a quarter mile or rail station by more than a half mile, and/or close or eliminate a bus stop or rail station without a replacement of any kind within a quarter mile for bus stops or a half mile for rail stations.

Table 6 compares the weekly revenue hours of each route that is undergoing a service change compared to the baseline and determines whether the service change is major or minor.

## 2 Line Extension Across I-90

### Description of Proposed Major Service Change

Extend service across I-90, adding new stations at Mercer Island, Judkins Park, and begin to serve all existing 1 Line stations between and including International District / Chinatown and Lynnwood City Center.

It will operate 7 days a week, every 8 minutes during AM and PM peak hours, every 10 minutes during midday and 8-15 minutes during off-peak periods (Table 7).

Table 6: Approximate span of service and headways of 2 Line Extension current and proposed service

Approximate Frequencies		
Service Period	Current 2 Line South Bellevue – Downtown Redmond	Proposed 2 Line Lynnwood City Center – Downtown Redmond
<b>Weekdays, Saturday, Sunday</b>	<b>5:31AM - 9:34PM</b>	<b>5:00AM - 12:00AM</b>
Early AM	8-15 min.	8-15 min.
AM Peak	8 min.	8 min.
Midday	10 min.	10 min.
PM Peak	8 min.	8 min.
Evening	10 min.	10 min.
Late Evening	15 min.	15 min.
<i>Frequencies and proposed span are approximate and may vary by direction and may be revised as additional scheduling and operational planning occurs. Span is based on the departure of the first and last possible trips that serve the full line alignment.</i>		

Table 7: Weekly revenue hours for 2 Line current and proposed service

	Current Service	Proposed Service	Percent change
Weekly revenue hours	610.4	2507.4	411%

The 2 Line would have 2507.4 weekly revenue hours, an increase of 1,897 hours compared to the current service (Table 6).

### Adverse Effects & Benefits

Addition of new stations qualifies as a major service change subject to Title VI Analysis. In this case, there are no adverse effects because service is improved. The service change improves access and revenue hours are increased to maintain or improve current service levels while the length of the line increases.

### Adverse Effects

The extension of the 2 Line does not result in any adverse effects because it adds service.

## Benefits

The extension of the 2 Line benefits riders by increasing service coverage and introducing Link service to Mercer Island & Judkins Park. It also benefits riders by providing a rail connection between destinations on the eastern side of Lake Washington to Seattle and increases train frequency between Lynnwood and Chinatown to approximately every 4-8 minutes when combined with 1 Line service.

## Title VI Analysis

Adding new stations to a route qualifies as a major service change subject to Title VI analysis. In this case, there is no adverse effect because the added stations would improve service in the area by providing additional access for passengers travelling in and around the area.

- **No disparate impact:** The minority population of the 2 will not be adversely affected by a reduction of service. Therefore, the East Link Starter Line does not have a disparate impact.
- **No disproportionate burden:** The low-income population of the 2 Line will also not be adversely affected by a reduction of service. As such, there is no disproportionate burden.

*Table 8: Title VI Populations in the Sound Transit District and the 2 Line service area*

	Minority Population	Low-Income Population	Limited English Proficiency (LEP) Population
Sound Transit District	40.5%	19.8%	10.3%
Existing 2 Line Service Area	45.3%	12%	11.7%
New 2 Line Service Area	38.9%	16.1%	9.5%
Difference between new and previous Service Area	-6.4%	+4.1%	-2.2%
Difference between New Service Area and District	-1.6%	3.7%	-0.8%
Exceeds percentage of the protected population within the District by at least five percentage points	No	No	No

See Figures 3-8 for maps of protected populations in the 2 Line service area.

## Mitigations

Mitigations are not required since there is no finding of disparate impact or disproportionate burden.

## Public Input

Public involvement on the 2 Line has spanned more than a decade, beginning with the ST2 System Plan. During the East Link Extension project alternatives analysis, staff facilitated four public meetings, gathering 300 scoping comments. Throughout environmental review, 28 open houses and workshops resulted in 1,887 public comments on 24 project alternatives. During design, open houses and stakeholder briefings provided opportunities for input on cost-saving ideas, with 575 attendees contributing 571 comments.

During construction, Sound Transit staff engaged over 10,000 community members at events. When the COVID-19 pandemic halted in-person engagement, they adapted by creating virtual outreach options. A virtual booth launched in late 2020 attracted over 10,000 unique page views and 115 survey responses. Virtual office hours provided updates on project status, safety testing, and transit services, extending into early 2022 due to high participation.

In late 2022, Sound Transit announced service delays, shifting focus to outreach for the East Link starter line, anticipated to open in spring 2024, with full project completion in 2025.

Additionally, staff planned a variety of outreach, communications, and engagement tactics to inform riders about the proposed changes in the 2024 Service Plan, with a section focused on the East Link Starter Line. These engagement activities included both in-person and virtual engagement beginning in May 2023 and running through the end of the engagement period in mid-August. Additional engagement activities for the completed 2 Line are scheduled for summer 2025 as part of engagement for the 2026 Service Plan.

## Conclusion

The extension of the 2 Line does not have adverse impacts, nor is there a determination of disparate impact or disproportionate burden.

# Sound Transit Systemwide Service Analysis

**Note:** The results and metrics listed in this section are based off current preliminary assumptions, and do not reflect the final state of the 2026 Service Plan proposal. The proposed 2026 Service Plan will be available later in 2025. All service proposals are subject to change and require board approval.

## Overview

The systemwide analysis compares benefits and impacts to Title VI protected & non-protected populations on all routes with changes over multiple years. The systemwide analysis follows the agency's Title VI policy, adopted by the Board of Directors in August 2022. **The results of the systemwide analysis did not identify any findings.**

The systemwide analysis evaluates service reductions and service additions separately. The analysis shows that the distribution of benefits to protected populations exceeds 80% for protected populations and the reduction of service to protected populations does not exceed 20% of the distribution. Therefore, the systemwide analysis did not identify any adverse effects on protected populations from September 2023 to September 2026. The following sections step through the process for each analysis.

## Methodology

In order to conduct the system wide analysis, the percentage of low-income and non-low-income populations impacted by the change are compared to the overall district using a ratio. The analysis begins by identifying the populations affected by service changes and summarizing into totals for people experiencing increased service and people experiencing reduced service. Then the total affected populations are compared to the total population to calculate a percentage. Next, the threshold test evaluates the population comparison percentage to test for equity impacts.

## Identifying Systemwide Service Additions & Reductions

The first step in the analysis identifies service reductions and additions by route. Table 16 shows the total change in scheduled weekly revenue hours between September 2023 and September 2026 for each route. When weekly revenue hours increased, this change is identified as an addition. When weekly revenue hours decrease, this change is identified as a reduction. In the following analysis steps, the totals for the routes in each group will be used to evaluate systemwide reductions and additions.

The changes in revenue hours reflect the on-going impact of staffing shortages which limit the amount of service that can be delivered.

Table 9: Scheduled weekly revenue hours by service change from September 2023 - September 2026

Route	Sept. 2023	Mar. 2024	Sept. 2024	Mar. 2025	Sept. 2025	Mar. 2026	Sept. 2026	Difference between Sept. 2023 & Sept. 2026	Percent Difference between Sept. 2023 & Sept. 2026	Addition or Reduction
1 Line	2,190	2,118	2,610	2,773	2,773	2,773	2,773	583	79%	Addition
2 Line	0	0	490	610	2,507	2,507	2,507	2,507	N/A	Addition
510	172	184	198	198	198	198	0	-172	-100%	Reduction
511	0	0	0	0	0	0	0	0	N/A	Addition
512	921	920	939	771	771	771	733	-188	-20%	Reduction
513	96	90	104	69	69	69	160	64	66%	Addition
515	N/A	N/A	N/A	N/A	225	225	0	0	N/A	Addition
522	975	1,019	1,019	1,019	1,019	1,019	1,019	44	5%	Addition
532	125	131	142	147	147	147	147	22	17%	Addition
535	398	419	431	452	452	452	593	195	49%	Addition
542	427	427	427	427	427	427	853	426	100%	Addition
545	1,077	1,071	1,071	1,071	1,071	1,071	0	-1,077	-100%	Reduction
550	883	903	903	898	898	898	0	-883	-100%	Reduction
554	664	663	663	664	664	664	0	-664	-100%	Reduction
556	108	105	105	105	105	105	663	555	512%	Addition
560	673	650	623	630	200	200	623	-50	-7%	Reduction
566	196	198	200	200	630	630	400	204	104%	Addition
574	772	834	813	828	828	828	1,594	822	107%	Addition
577	274	263	209	220	263	263	0	-274	-100%	Reduction
578	708	722	704	706	722	722	0	-708	-100%	Reduction
580	13	8	0	0	8	8	0	-13	-100%	Reduction
586	126	119	111	123	123	123	0	-126	-100%	Reduction
590	329	365	176	173	365	365	0	-329	-100%	Reduction
592	171	166	179	184	184	184	184	13	7%	Addition
594	861	828	781	794	828	828	0	-861	-100%	Reduction
595	61	62	67	68	68	68	0	-61	-100%	Reduction
596	42	46	36	37	37	37	36	-6	-14%	Reduction
Souder North	26	26	53	53	53	53	53	27	104%	Addition
Souder South	183	183	183	183	183	183	183	0	0%	No Change
Tacoma Link	480	480	480	480	480	480	480	0	0%	No Change

## Systemwide Service Reductions Analysis

When a systemwide potential adverse effect occurs due to major service changes on more than one line or route, the agency determines if the collective service reductions create a disparate impact or disproportionate burden by comparing the percentage of the service area's minority or low-income population adversely affected by the major service reductions to the percentage of the district's non-minority or non-low-income population adversely affected.

Collective service reductions include both service reductions under consideration for the next year and implemented service reductions in the past two years, both major and minor service changes.

Table 10 shows the total change in weekly revenue hours between September 2023 and September 2026 for each route with a service reduction. The population columns then identify the total Title VI-protected and non-Title VI-protected populations affected by the service reduction for each route.

*Table 10: Populations affected by service reduction September 2023 to September 2026*

Route	Change in Weekly Revenue Hours	Benefit or Reduction	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
510	-172	Reduction	336,164	129,388	206,776	77,697	258,467
511	0	No Change	418,642	148,928	269,714	76,009	342,633
512	-188	Reduction	559,253	200,511	358,742	112,500	446,753
515	0	No Change	333,580	135,433	198,147	49,703	283,877
545	-1,077	Reduction	261,666	123,056	138,610	39,672	221,994
550	-883	Reduction	138,249	67,206	71,043	23,856	114,393
554	-664	Reduction	233,043	110,829	122,214	36,005	197,038
560	-50	Reduction	117,314	60,625	56,689	26,888	90,426
577	-274	Reduction	162,255	83,177	79,078	42,892	119,363
578	-708	Reduction	278,113	118,311	159,802	67,934	210,179
580	-13	Reduction	85,599	20,955	64,644	15,989	69,610
586	-126	Reduction	191,826	92,423	99,403	61,712	130,114
590	-329	Reduction	157,493	68,427	89,066	44,355	113,138
594	-861	Reduction	241,498	111,865	129,633	75,550	165,948
595	-61	Reduction	278,780	96,889	181,891	63,738	215,042
596	-6	Reduction	66,014	12,402	53,612	10,140	55,874
Sounder South	0	No Change	1,228,331	557,262	671,069	309,216	919,115
Tacoma Link	0	No Change	267,573	107,591	159,982	70,561	197,012

## Analysis

If the percentage of the minority or low-income population adversely affected is more than 20 percent greater than the percentage of the non-minority or non-low-income population adversely affected (e.g., 12 percent or more of the minority population is adversely affected while 10 percent or less of the non-minority population is adversely affected), the reductions create a disparate impact or disproportionate burden.

Using the data collected in the above table the following percentages were calculated for populations adversely affected by service reductions compared with the total population in the service area of all routes:

- Minority population adversely affected: 30.6%
- Non-Minority population adversely affected: 31.5%
- Low-Income population adversely affected: 33.7%
- Non-Low-Income population adversely affected: 30.4%

### Service Reductions Disparate Impact Test

To evaluate for a potential disparate impact, the percentage of the minority population adversely affected is compared to the percentage of the non-minority population adversely affected using a ratio (Table 11). **Because the result of -3% is not 20 percent or greater, no disparate impact was identified.**

Table 11: Service reduction disparate impact test

Minority Population Adversely Affected	Non-Minority Population Adversely Affected	Ratio Comparison	Threshold for Disparate Impact	Result
30.6%	31.5%	-3%	20% or greater	No Disparate Impact
<sup>1</sup> In order to compare with the policy threshold the ratio calculation is shown as the difference from 100%.				

### Service Reductions Disproportionate Burden Test

To evaluate for a potential disproportionate burden, the percentage of the low-income population adversely affected is compared to the percentage of the non-low-income population adversely affected using a ratio (Table 12). **Because the result of 10.7% is not 20 percent or greater, no disproportionate burden was identified.**

Table 12: Service reduction disproportionate burden test

Low-Income Population Adversely Affected	Non- Low-Income Population Adversely Affected	Ratio Comparison	Threshold for Disproportionate Burden	Result
33.7%	30.4%	10.7%	20% or greater	No Disproportionate Burden
<sup>1</sup> In order to compare with the policy threshold the ratio calculation is shown as the difference from 100%.				

## Systemwide Service Additions Analysis

When a systemwide adverse effect occurs due to major service changes on more than one line or route, the agency determines if the collective service additions create a disparate impact or disproportionate burden by comparing the percentage of the service area's minority or low-income population benefiting from the major service additions to the percentage of the District's non-minority or non-low-income population benefiting.

Collective service additions include both service additions under consideration for the next year and implemented service additions in the past two years, both major and minor service changes.

Table 13 shows the total change in weekly revenue hours between September 2023 and September 2026 for each route with a service addition. The population columns then identify the total Title VI-protected and non-Title VI-protected populations benefiting from the service addition for each route.

Table 13: Populations benefited by service addition, September 2023 to September 2026

Route	Change in Weekly Revenue Hours	Benefit or Reduction	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
513	64	Benefit	503,500	198,883	304,617	69,483	434,017
522	44	Benefit	156,884	46,929	109,955	22,469	134,415
532	22	Benefit	357,364	145,457	211,907	71,346	286,018
535	195	Benefit	248,157	95,048	153,109	37,907	210,250
542	426	Benefit	199,881	94,935	104,946	30,246	169,635
556	555	Benefit	224,636	102,657	121,979	31,840	192,796
566	204	Benefit	327,710	189,744	137,966	50,140	277,570
574	822	Benefit	311,248	159,568	151,680	99,582	211,666
592	13	Benefit	179,701	85,665	94,036	55,644	124,057
1 Line	583	Benefit	1,298,120	541,936	756,184	265,916	1,032,204

Route	Change in Weekly Revenue Hours	Benefit or Reduction	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
2 Line	2,507	Benefit	433,574	196,498	237,076	52,064	381,510
Sounder North	27	Benefit	396,128	138,230	257,898	84,872	311,256

## Analysis

If the percentage of the minority or low-income population benefited is 80 percent or less than the percentage of the non-minority or non-low-income population benefited (e.g., eight percent or less of the minority population benefits while 10 percent or more of the non-minority population benefits), the changes create a disparate impact or disproportionate burden.

Using the data collected in the above table the following percentages were calculated for populations benefiting from service additions compared with the total population in the service area of all routes:

- Minority population benefiting: 47.1%
- Non-Minority population benefiting: 45.9%
- Low-Income population benefiting: 42%
- Non-Low-Income population benefiting: 47.6%

## Service Additions Disparate Impact Test

To evaluate for a potential disparate impact, the percentage of the minority population benefiting is compared to the percentage of the non-minority population benefiting using a ratio (Table 14).

**Because the result of 102.5% percent is not greater than the 80 percent or less threshold, no disparate impact was identified.**

Table 14: Service additions disparate impact test

Minority Population Benefiting	Non-Minority Population Benefiting	Ratio Comparison	Threshold for Disparate Impact	Result
47.1%	45.9%	102.5%	80% or less	No Disparate Impact

## Service Additions Disproportionate Burden Test

To evaluate for a potentially disproportionate burden, the percentage of the low-income population benefiting is compared to the percentage of the non-low-income population benefiting using a ratio (Table 15). **Because the result of 88.3% percent is not greater than the 80 percent or less threshold, no disproportionate burden was identified.**

Table 15: Service additions disproportionate burden test

Low-Income Population Benefiting	Non- Low-Income Population Benefiting	Ratio Comparison	Threshold for Disproportionate Burden	Result
42%	47.6%	88.3%	80% or less	No Disproportionate Burden

## Systemwide Analysis Conclusion

The systemwide analysis evaluates service reductions and service additions separately. For service additions, the analysis shows that the distribution of benefits to protected populations exceeds 80%. For service reductions, the adverse impacts to protected populations do not exceed 20%.

**Therefore, the systemwide analysis did not identify any disparate impacts or disproportionate burdens on protected populations from September 2023 through September 2026.**

## Conclusion

This report documents the Title VI Service and Fare Equity Analysis required for the East Link Extension Line (2 Line). The analysis was based on agency Title VI thresholds and FTA's Circular 4702.1B to determine whether the proposed new service will have a disparate impact or disproportionate burden on minority and low-income populations relative to non-low-income and nonminority populations.

The opening of the East Link Extension Line would offer a significant opportunity to provide more improved mobility and extend transit service. Based on the above analyses, there were no findings for disparate impacts or disproportionate burdens and no mitigations are necessary.