

Federal Way Link Extension (FWLE)

Title VI Service & Fare Equity Analysis

Executive Summary

The opening of the Federal Way Link (FWLE) 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 Federal Way Line Extension (1 Line) is an 8-mile Link light rail project that includes 3 stations from SeaTac to Federal Way (Figure 1). The FWLE does not result in any local or regional service restructuring.

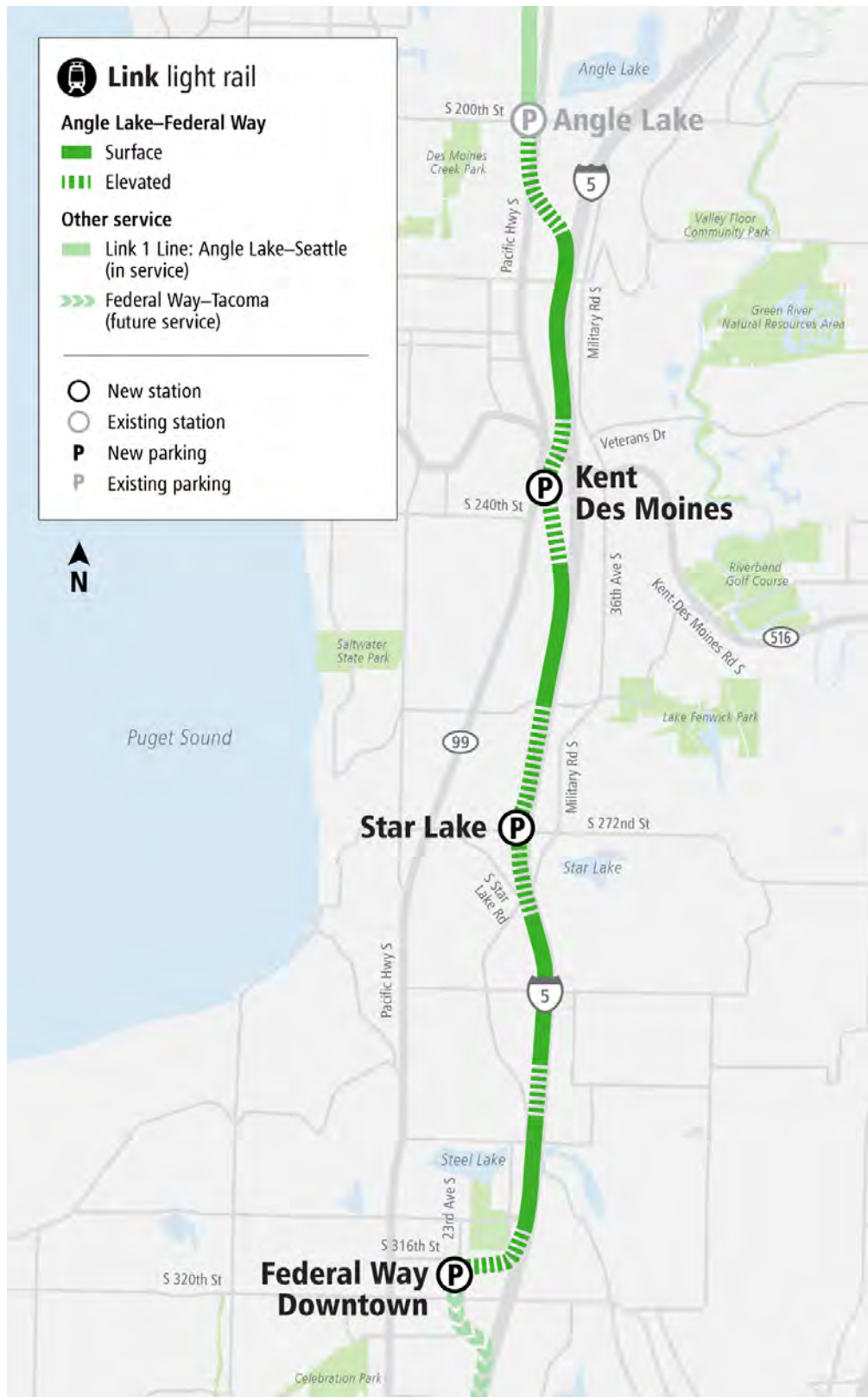


Figure 1: Federal Way Line Extension (1 Line), three new stations from SeaTac to Federal Way

The **individual route analysis** evaluates each service change associated with the FWLE on a route-by-route basis and found no adverse effects. The FWLE 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 FWLE, nor are there changes to Sound Transit fares with the start of the FWLE. Fares on Sound Transit's Link and ST Express bus services are aligned for all rider fare categories. There is therefore no determination of disparate impact or disproportionate burden. Mitigations are not required.

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 service changes 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 Federal Way 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 Federal Way Link. Additional details and explanation are included in the following document.

Table 1: Summary of 2026 Service Plan Title VI Service Equity Analysis

Route	Service Change	Title VI Protected Populations	Adverse effects	Disparate impact ¹	Disproportionate burden ²	Mitigations
1 Line	Begin serving the FWLE stations of Star Lake, Kent Des Moines, and Federal Way Downtown.	Minority District Average – 42.6% Existing 1 Line Service Area – 43.5% New 1 Line Service Area – 45.1% Low Income: District Average – 19.5% Existing 1 Line Service Area – 20.1% New 1 Line Service Area – 20.9%	No	No	No	N/A

Sound Transit sought public feedback on the FWLE with several online and in person engagement tactics. Staff, contractors, and consultants facilitated numerous tabling events and open houses throughout the project area, in addition to door-to-door activities and email communications. These activities included information about design-build contracting processes, construction and property acquisition, educational tours, and more. Additionally, Sound Transit project teams distributed portable air conditioners as a mitigation for construction activities to Camelot Square Mobile Home Park due to proximity to construction. Overall, over 10,000 individuals were engaged across various in-person events, and over 50,000 communications (post cards, emails, flyers, etc.) were distributed.

¹ If the service area of a route would change with the proposed service change, the analysis compares the Sound Transit District average to the service area percentages before and after the change to determine if either service area would experience disparate impacts. All impact findings were the same for service areas before and after the service change.

² If the service area of a route would change with the proposed service change, the analysis compares the Sound Transit District average to the service area percentages before and after the change to determine if either service area would experience disproportionate burden. All burden findings were the same for service areas before and after the service change.

Introduction

This Service and Fare Equity (SAFE) Analysis applies to the Federal Way Line Extension (FWLE) segment of Sound Transit's Link light rail system expansion, on the 1 Line. 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 FWLE and associated changes. The FWLE SAFE does not include a fare 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 and the Federal Transit Administration (FTA) published a Draft Environmental Impact Statement (DEIS) on the Federal Way Link Extension project in April 2015. After considering the Draft EIS, public and agency comments, and supporting materials, the Sound Transit Board passed Motion M2015-56 in July 2015, identifying a Preferred Alternative for the project. The Final EIS was issued November 18, 2016. The Final EIS included a No Build Alternative, a Preferred Alternative, and three other build alternatives including three station alternatives, and station and alignment design options. On January 26, 2017, after consideration of the Final EIS, comments on the Final EIS, and other materials, the Sound Transit Board passed Resolution R2017-02, selecting the project to build. The FTA issued a Record of Decision (ROD) in March 2016 as did the Federal Highway Administration (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. It would not provide direct, reliable, or high-frequency transit service to key regional destinations where higher density is planned. Additionally, the benefits of the project such as regional air quality resulting from reduced vehicle miles traveled would not be realized with the No-Build Alternative.

Due to the highly urbanized nature of the Federal Way Link study area, impacts on natural resources are limited, although substantial tree removal adjacent to I-5 would be needed for the Preferred Alternative, modifying upland, urban habitat. Project-wide impacts before mitigation included property acquisition with associated residential and business relocation, noise from light rail operations adjacent to residential areas, reduction of visual quality in areas, and some impacts to streams and wetlands. The FEIS determined the Federal Way 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 for the project could be between one and four years on any given portion of the route. Station construction typically lasts two to three years per station area. Traffic and access may be adversely affected, which could affect adjacent businesses and residents. Construction would also result in

dust and noise, lower visual quality around the construction site, and have temporary impacts on wetlands streams.

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, streams, upland habitat (vegetation), noise, visual quality, and transportation. A preliminary list of mitigation commitments was developed for the Preferred Alternative and included in Appendix H of the FEIS. Most impacts associated with the Federal Way Link Extension would be effectively mitigated, and the remaining impacts would be limited in scope and/or duration. FTA's NEPA Record of Decision (ROD) included a list of all committed mitigation measures for the project to be built.

The Federal Way Link Extension would have several beneficial effects, including improved access to transit; a safer, more reliable, and more efficient transportation system; improved mobility; transit travel time savings; improved accessibility to regional employment centers; and extended transit service hours.

The Central Puget Sound Transit Context

As a regional transit provider, Sound Transit offers regional connections 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. King County 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.

Federal Way Link Extension & 2025 Planning Context

Federal Way Link Extension Planning Context

The Federal Way Link Extension (FWLE) is an 8-mile Link light rail project that will extend 1 Line service south from Angle Lake to three new stations at Kent Des Moines, Star Lake, and Federal Way Downtown. Trains will run between Federal Way Downtown Station and Lynnwood City Center Station from approximately 5 a.m. to 1 a.m., arriving approximately every 8 minutes at peak and every 10-15 minutes at off peak and on weekends. Changes to ST Express service will be considered separately by the Board as part of the 2026 Service Plan. No changes for ST Express related to Federal Way Link Extension will occur before Fall 2026.

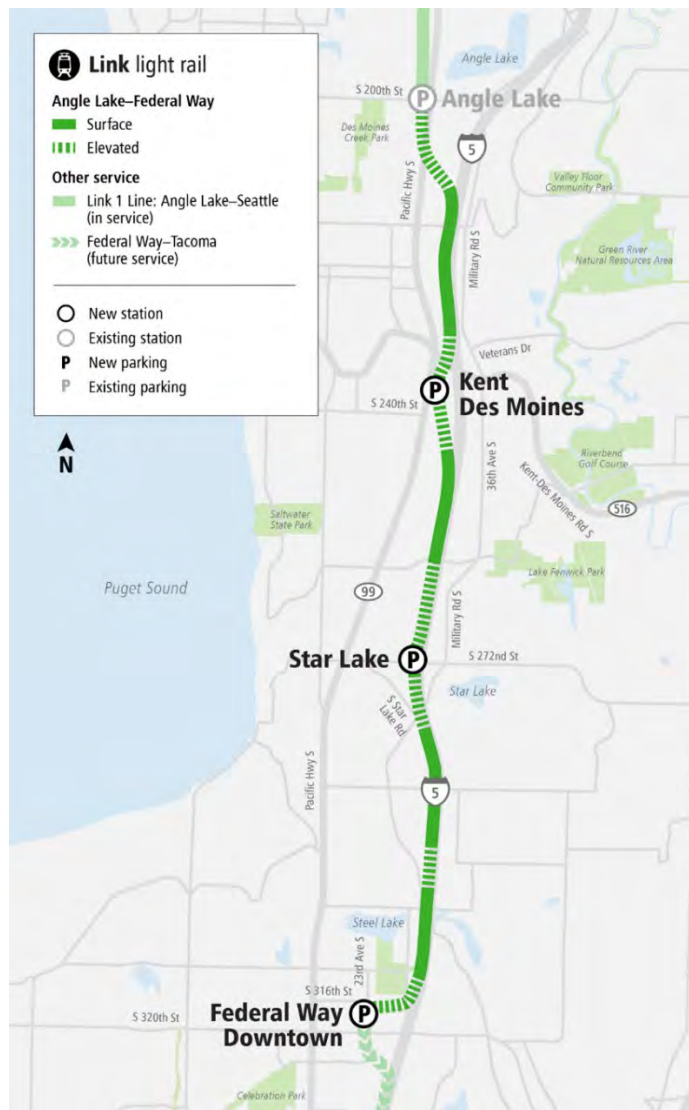


Figure 2: Federal Way Line Extension (1 Line), three new stations from SeaTac to Federal Way

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.

Fare Equity Analysis Policy

Sound Transit Board of Directors Resolution R2022-19 establishes policies for conducting equity analyses of fare changes impacting minority and low-income populations.

The policy directs Sound Transit to conduct a fare equity analysis prior to making any fare change or service change that affects fares to analyze potential adverse effects on minority and low-income populations and establishes the following thresholds for determining whether the proposed fare

change would have a disparate impact on minority populations and/or a disproportionate burden on low-income populations:

- **Fare increases.** When considering a fare increase, if the agency's analysis indicates that the average percentage fare increase experienced by minority or low-income riders is 20 percent or greater than the average percentage fare increase experienced by non-minority or non-low-income riders, the change creates a disparate impact or disproportionate burden.
- **Fare decreases.** When considering a fare decrease, if the agency's analysis indicates the average percentage fare decrease experienced by non-minority or non-low-income riders is 20 percent or greater than the average percentage fare decrease experienced by minority or low-income riders, the change creates a disparate impact or disproportionate burden.

Per Sound Transit's policy, if a disparate impact or disproportionate burden is found during the fare equity analysis, Sound Transit will consider steps to avoid, minimize, or mitigate the adverse effects and reanalyze the modified changes to determine if the impacts are removed or lessened.

Fare Equity Analysis

There are no changes to any local or regional service with the start of the FWLE, nor are there changes to Sound Transit fares with the start of the FWLE. Fares on Sound Transit's Link and ST Express bus services are aligned for all rider fare categories: Adult, Low-Income Adult (ORCA LIFT), Seniors and Riders with Disabilities. Youth 18 years and under ride free on all Sound Transit services. For these reasons, the FWLE will result in no disparate impacts and no disproportionate burden with regards to Sound Transit fares. The FWLE will provide additional opportunities for riders to transfer between Link and other transit services using ORCA fare payment. Sound Transit will work to make ORCA cards available to cash-paying riders in communities served by the FWLE prior to and after the extension opens. This will enable former cash riders to take advantage of the intermodal and interagency transfer benefits provided by ORCA fare payment.

Public Involvement Policy

Sound Transit conducts public outreach regarding fare changes and major service changes as consistent with Sound Transit's 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 district³ 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.

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 (Figures 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.

³ 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.

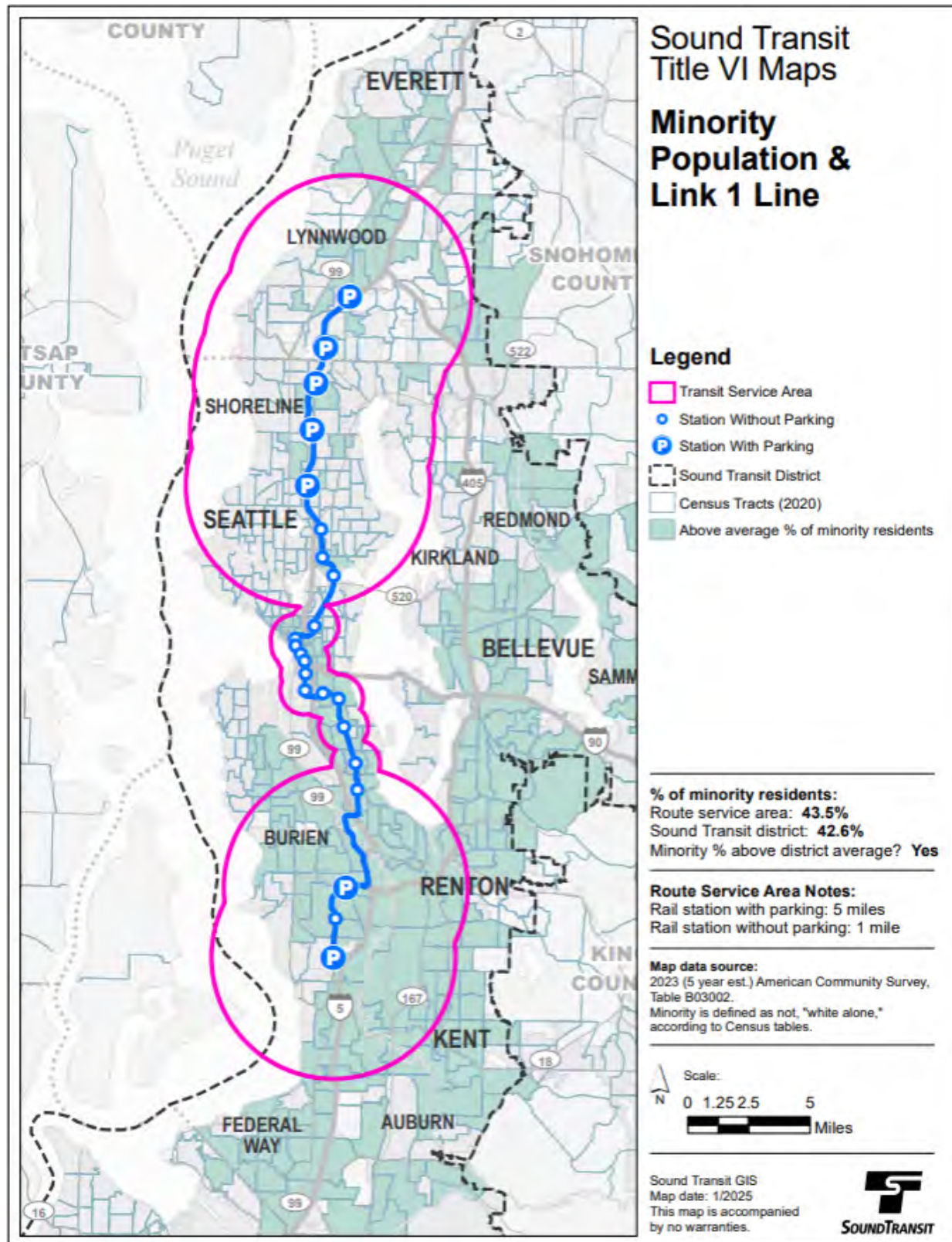


Figure 3: Map of Title VI Minority population of the existing 1 Line, prior to the Federal Way Link Extension

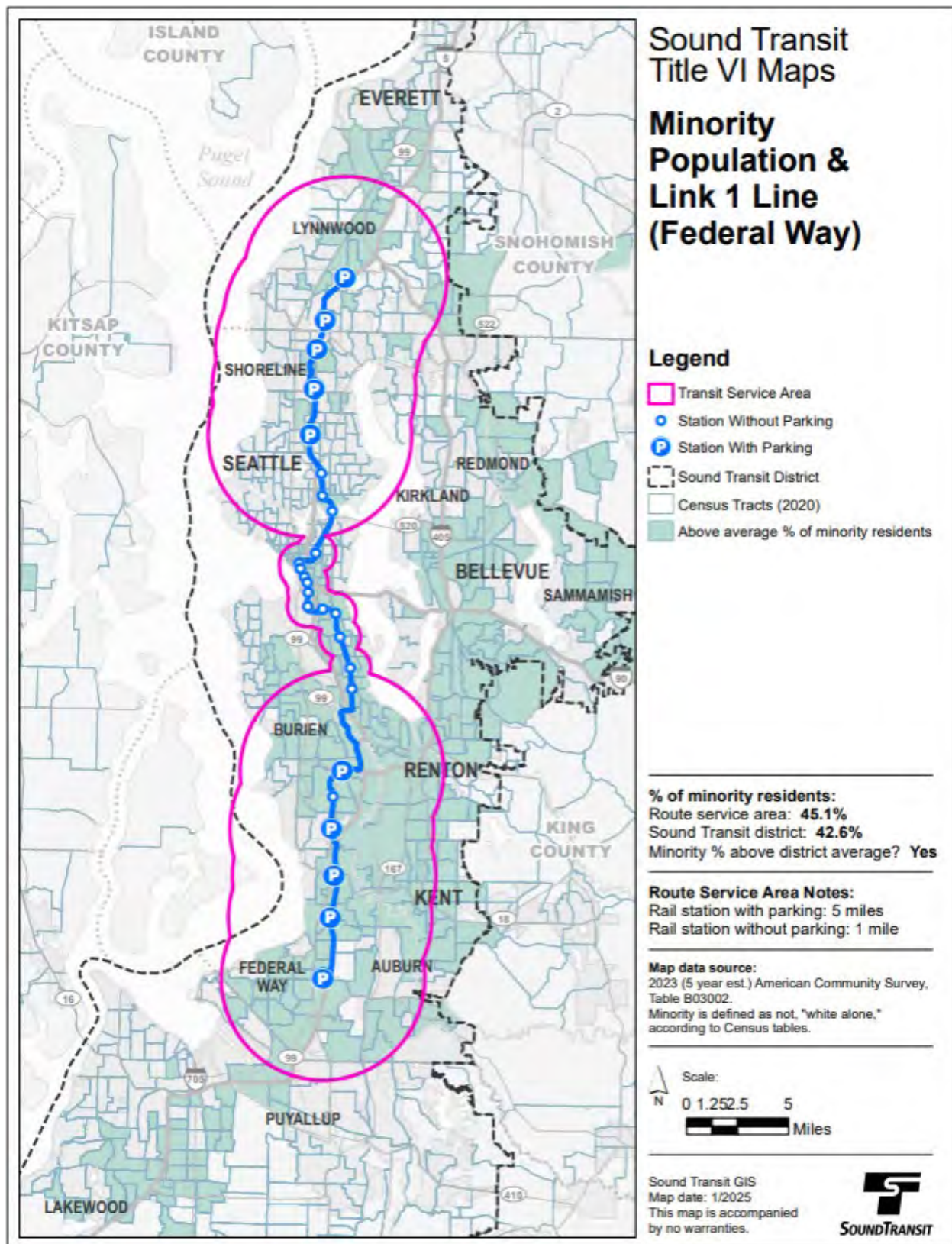


Figure 4: Map of Title VI Minority population for the 1 Line after the Federal Way Link Extension

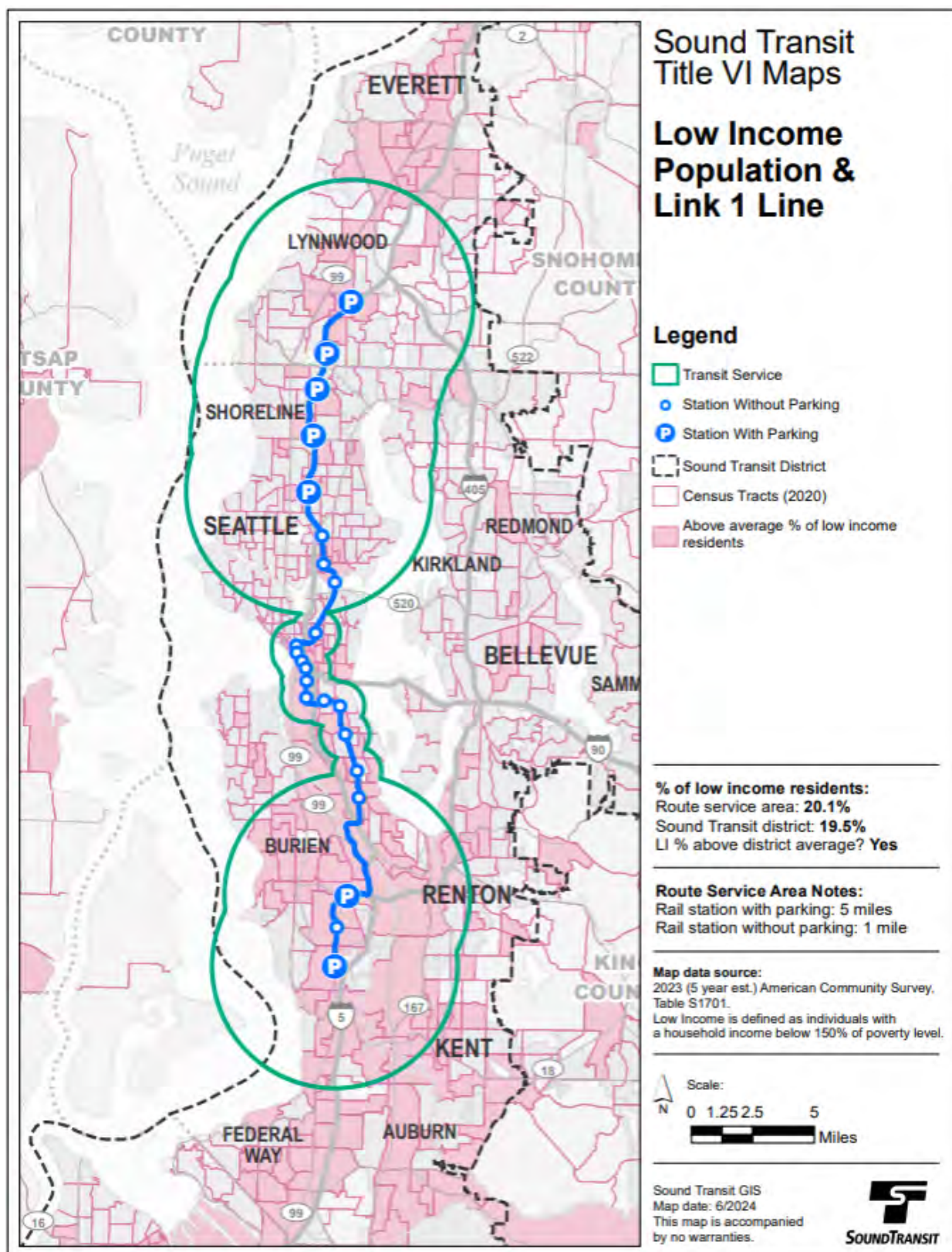


Figure 5: Map of Title VI Low Income population for the existing 1 Line, prior to the Federal Way Link Extension

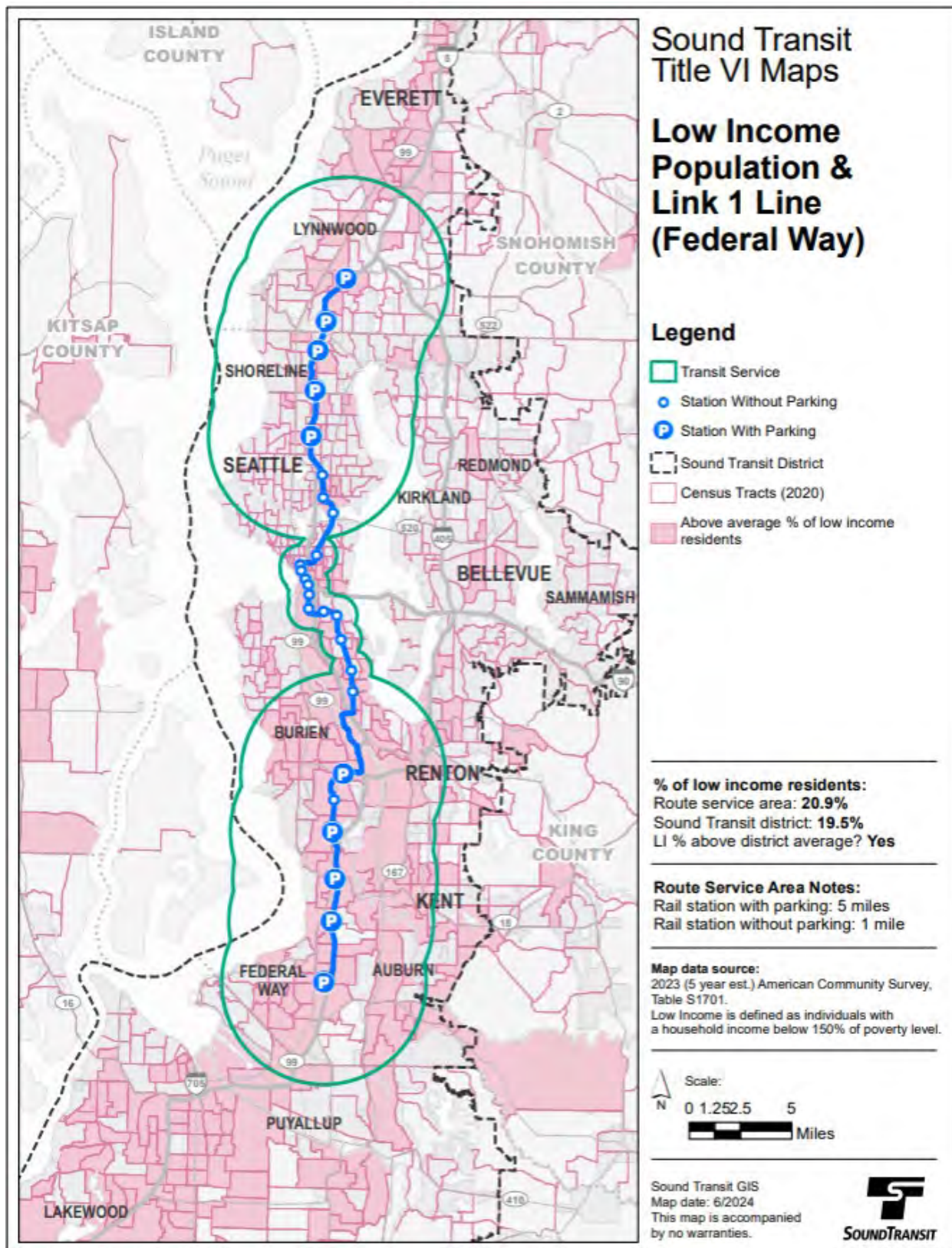


Figure 6: Map of Title VI Low Income population of the 1 Line after the Federal Way Link Extension

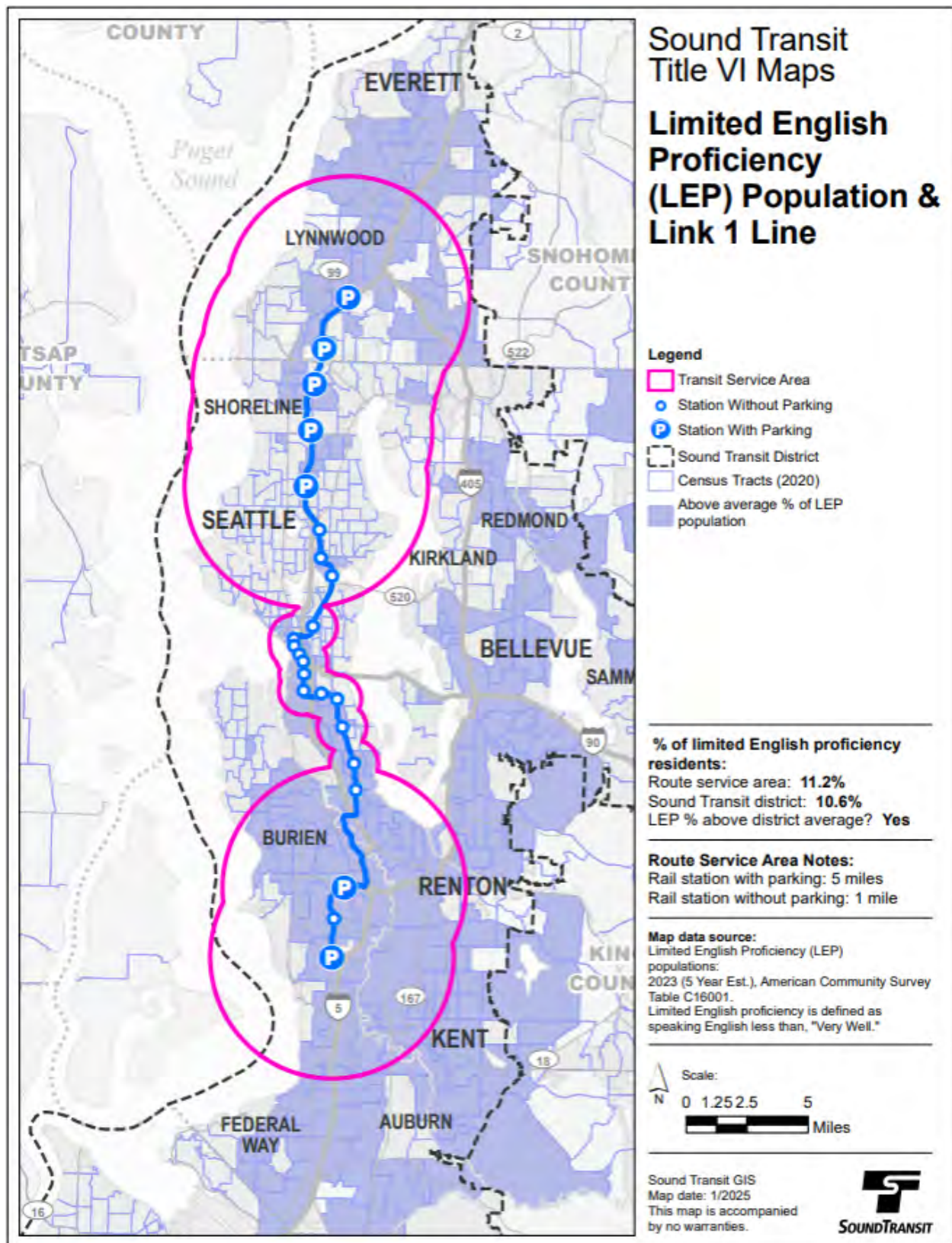


Figure 7: Map of Title VI Limited English Proficiency (LEP) population for the 1 Line prior to the Federal Way Link

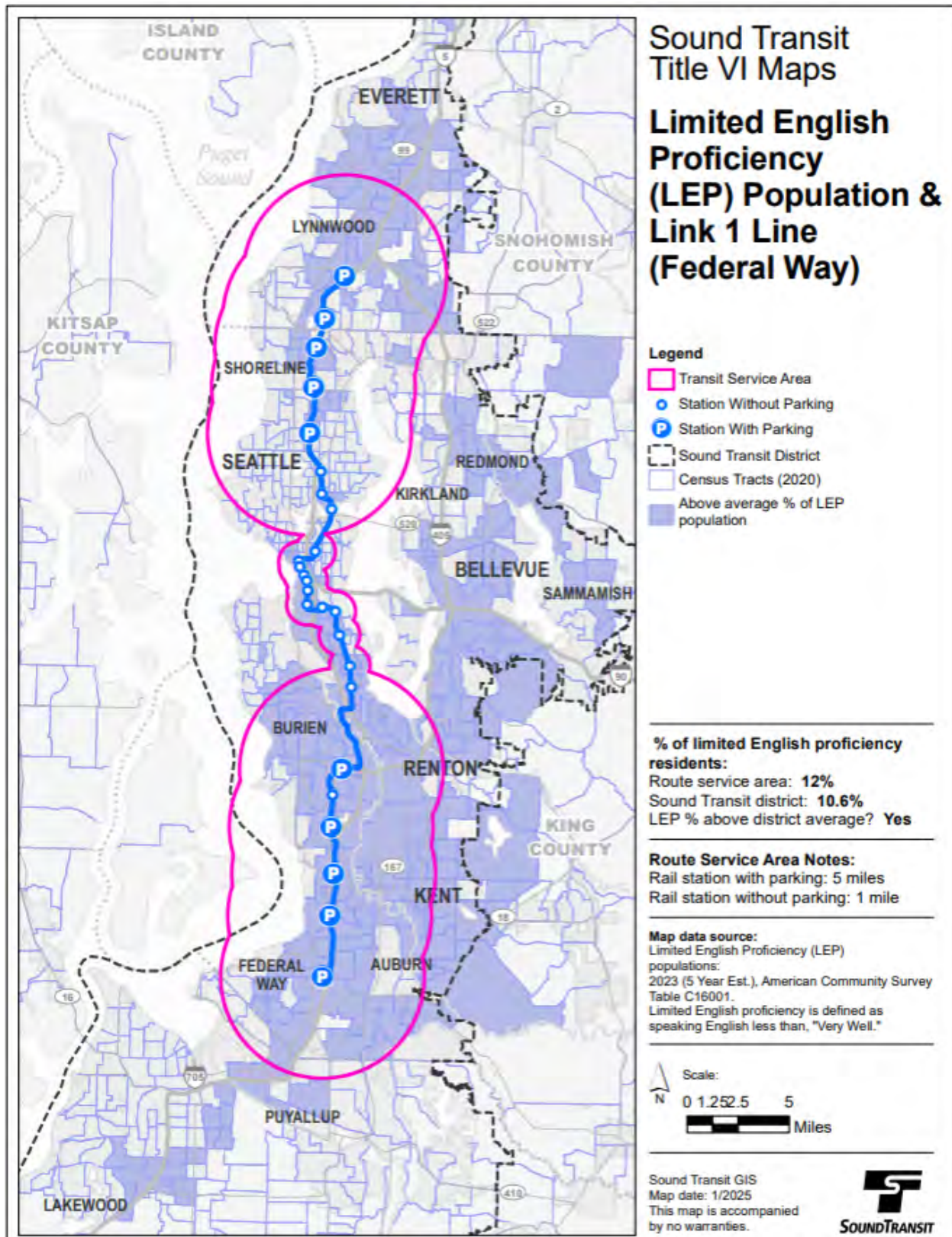


Figure 8: Map of Title VI Limited English Proficiency (LEP) population for the 1 Line after the Federal Way Link Extension

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)
Express Bus			
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%
Commuter Rail			
Sounder N Line	37.5%	22.4%	10.4%
Sounder S Line	48.6%	26.3%	12.3%
Light Rail			
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%
Streetcar			
T Line	42.0%	25.4%	8.5%
District Average	40.5%	19.8%	10.3%

Public Outreach & Involvement

The Federal Way Link Extension (FWLE), a vital expansion of the regional light rail network, began construction in 2020. Since the onset of the project, Sound Transit has maintained a strong commitment to public engagement and transparency, ensuring that communities along the route remained informed, involved, and supported throughout the construction process. Communities in this corridor are some of the most diverse in Sound Transit's Link service area. This has created opportunities for new relationships and higher levels of engagement. The goals and objectives for the FWLE Community Engagement group include:

- Proactively provide regular updates and information about potential impacts to ensure there are no surprises.
- Make information accessible for a variety of audiences and communicate in multiple formats and languages to be able to reach all impacted communities.
- 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.
- Address impacts from the FWLE project.
- Serve as a primary point of contact so that problems raised by the community are addressed quickly.

Project Phase	Engagement Objective
Project Scoping	Inform the public within the project corridor of Sound Transit's intent to prepare an Environmental Impact Statement for the Federal Way Link Extension and provide opportunities to share preferences
Conceptual Development of Alternatives	Consult with the community about design ideas and priorities for Federal Way Link Extension route and station alternatives.
Draft Environmental Impact Statement	Document impact to the natural and built environment and seek feedback from the public regarding these impacts and the potential routes and stations studied in environmental review.
Final Environmental Impact Statement	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.
Final Design/Pre-Construction	Provide updates on the final design of the project and ensure readiness regarding the start of construction for communities near light rail construction areas.
Construction	Serve as the main point of contact for the community by providing proactive updates on construction activities, being responsive to

Project Phase	Engagement Objective
	community concerns and questions, along with coordinating with the construction management team to provide mitigations to address construction impacts.
Transition to Operations	Once the project is substantially complete, provide information on the sounds and sights of operating light rail to the community and coordinate with safety, bus/rail integration, and operations for rail activation.

From early planning to the end of construction, Sound Transit has actively engaged with residents, businesses, and local leaders through a wide range of outreach methods. This included neighborhood briefings, large public events, attendance at farmers markets, and other community celebrations and festivals. These efforts helped ensure that residents had direct access to project information, opportunities to ask questions, and channels to provide feedback.

The FWLE Community Engagement team were instrumental in ensuring communities and potentially affected stakeholders had a chance to provide feedback early in the planning phase. With the kickoff of the environmental process in 2012, Sound Transit facilitated two public meetings as part of Early Scoping in 2012, and two additional meetings as part of Scoping in 2013, gathering 119 scoping comments. With the publication of the Draft EIS in 2015, the project hosted two public meetings and hearings where 617 comments were received over the engagement period. In addition, the FWLE project provided 43 stakeholder briefings and 37 informational tabling sessions throughout the environmental review phase.

Sound Transit maintained a significant and visible presence in the cities of Des Moines, Federal Way, Kent, and SeaTac, which were directly affected by construction. In Des Moines, outreach included consistent coordination with city staff and local businesses, particularly near Highline College. In Federal Way, Sound Transit supported major events and worked closely with stakeholders to mitigate construction impacts while preparing for future transit-oriented development. In Kent, extensive engagement was essential, especially around Structure C, where a soil stability issue led to a construction delay announced in 2022. In SeaTac, outreach focused on corridor aesthetics, access improvements, and coordination with adjacent infrastructure projects such as WSDOT's SR 509 Completion project.

In 2024, Sound Transit reached a milestone by opening College Way at Highline College and reopened the street to traffic, enhancing connectivity and access for students and residents near Kent Des Moines Station. This marked a major step toward full system completion. On March 30, 2025, Sound Transit opened the Federal Way Downtown Station Bus loop to prepare for the upcoming light rail openings and the opening of 319th Street.

In the current phase, the Engagement team has been connecting with project neighbors through drop-ins and other informational opportunities to get them prepared for the start of testing and pre-operations. Primary concerns from residents include visual and noise impacts from light rail operations. Through these years of construction and engagement, Sound Transit's community outreach efforts ensured that those most affected by the Federal Way Link Extension were not only informed but actively included in the progress of the project.

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 5). There are no changes to parallel or connecting bus routes, so the only analysis conducted was on the Federal Way Link Extension Line 1. The Federal Way Link Extension 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	Service Change	Title VI Protected Populations	Adverse effects	Disparate impact ⁴	Disproportionate burden ⁵	Mitigations
1 Line	Begin serving the FWLE stations of Star Lake, Kent Des Moines, and Federal Way Downtown.	Minority District Average – 42.6% Existing 1 Line Service Area – 43.5% New 1 Line Service Area – 45.1% Low Income: District Average – 19.5% Existing 1 Line Service Area – 20.1% New 1 Line Service Area – 20.9%	No	No	No	N/A

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.

⁴ If the service area of a route would change with the proposed service change, the analysis compares the Sound Transit District average to the service area percentages before and after the change to determine if either service area would experience disparate impacts. All impact findings were the same for service areas before and after the service change.

⁵ If the service area of a route would change with the proposed service change, the analysis compares the Sound Transit District average to the service area percentages before and after the change to determine if either service area would experience disproportionate burden. All burden findings were the same for service areas before and after the service change.

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.

1 Line // Extension to Federal Way

Description of Proposed Major Service Change

The project extends service to Federal Way, adding new stations at Kent Des Moines, Star Lake, and Federal Way.

Table 6: Approximate span of service and headways of Line 1 current and proposed service

Approximate Frequencies		
	Current 1 Line Lynnwood City Center – Angle Lake	Proposed 1 Line Lynnwood City Center – Downtown Federal Way
Weekdays, Saturday, Sunday	4:56 a.m. – 12:08 a.m.*	5:00 a.m. – 12:00 a.m.
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.
<p><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></p> <p><i>*Some trips begin before, or continue after this span; however they do not serve all stations. The span reflects the first and last trips that service every station.</i></p>		

Table 7: Weekly revenue house for Line 1 and proposed service

	Current Service	Proposed Service	Percent Change
Weekly Revenue Hours	2,221.1	2,697.4	21%

The 1 Line would have 2,697.4 weekly revenue hours; an increase of 21 percent compared to the current service (Table 7).

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 current service levels while the length of the line increases.

Adverse Effects

The extension of the 1 Line does not result in any adverse effects because it adds service.

Benefits

The extension of the 1 Line benefits riders by increasing service coverage and introducing Link service to Federal Way. It also benefits riders by improving service frequency and capacity to Seattle, and by providing an integrated connection with the 2 Line to improve access to destinations on the eastern side of Lake Washington.

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 1 Line will not be adversely affected by a reduction of service. Therefore, the Federal Way Link Extension does not have a disparate impact.
- **No disproportionate burden:** The low-income population of the 1 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 1 Line service area

	Minority Population	Low-Income Population	Limited English Proficiency (LEP) Population
Sound Transit District Average	42.6%	19.5%	10.6%
Existing 1 Line Service Area	43.5%	20.1%	11.2%
New 1 Line Service Area	45.1%	20.9%	12.0%
Difference between new and previous Service Area	1.6%	0.8%	0.8%
Difference between New Service Area and District	2.5%	1.4%	1.4%
Exceeds percentage of the protected population within the District by at least five percentage points	No	No	No

Mitigations

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

Public Input

Since 2018, Sound Transit has conducted extensive public involvement and engagement activities regarding the Federal Way Link Extension. Staff, contractors, and consultants have facilitated numerous tabling events and open houses throughout the project area, in addition to door-to-door activities and email communications. These activities included information about design-build contracting processes, construction and property acquisition, educational tours, and more.

Additionally, Sound Transit project teams distributed portable air conditioners as a mitigation for construction activities to Camelot Square Mobile Home Park due to proximity to construction. Overall, over 10,000 individuals were engaged across various in-person events, and over 50,000 communications (post cards, emails, flyers, etc.) were distributed.

Conclusion

The extension of the 1 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
¹ 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
¹ 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 Federal Way Link Extension (1 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 non-minority populations.

The opening of the Federal Way Link Extension 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.