

Appendix R

Fare Equity Analysis of Fare Change for Reduced Fare Riders Sounder Commuter Rail 2020

Authority

In accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration (FTA) Circular 4702.1B and Sound Transit's 2019 Title VI Program, an equity analysis is conducted any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The Civil Rights Act of 1964 states:

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

The FTA has provided specific implementing guidelines and regulations for complying with the Circular. Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to also consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to fare changes is completed through a fare equity analysis.

The proposal to decrease several categories of Sounder fares calls for such an analysis prior to the Sound Transit Board of Directors taking action.

Description of Fare Changes

Fares for Adult, Youth, ORCA LIFT, Senior and Riders with Disabilities on Sounder are distance-based (station-to-station) and were last updated in November 2015. (Sound Transit Board of Directors Resolution R2015-29).

This proposed fare change would lower the fares on Sounder for ORCA LIFT and Youth riders, Seniors and Riders with Disabilities, and align these fares with fares on Link and ST Express for these rider groups. Current and proposed fares are shown in the table below.

Rider Group	Current Fares*	Proposed Fare
ORCA LIFT	\$2.50-\$4.25	\$1.50
Youth	\$2.50-\$4.25	\$1.50
Seniors & Riders with Disabilities	\$1.50-\$2.75	\$1.00

* depending on distance travelled

Fare Equity Analysis Policy

Sound Transit Board of Directors Resolution R2013-19 established 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 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:

A disparate impact occurs when the minority percentage of the population adversely affected by a fare change is greater than the average minority percentage of the population of Sound Transit's service area.

A disproportionate burden occurs when the low-income percentage of the population adversely affected by a fare change is greater than the average low income percentage of the population of Sound Transit's service area.

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

Analysis of Disparate Impact/Disproportionate Burden

This proposed fare change would lower fares for reduced fare riders on Sounder: ORCA LIFT (low-income adult), Youth, Seniors and Riders with Disabilities. The fare proposal would have no adverse impact on low-income riders. Instead, it will directly benefit low-income (ORCA LIFT) riders by making travel on Sounder more affordable and will simplify fares for these riders by aligning fare levels with the ORCA LIFT fare on Sound Transit's Link and ST Express services and with the ORCA LIFT fare on King County Metro. The lower ORCA LIFT fare will have no adverse impact on minority riders. Since the percentage of ORCA LIFT riders that are minority (60 percent) * is greater than the Sound Transit District average (39.7 percent) this proposed change will benefit minority riders.

This equity analysis focuses on minority and low-income populations, but it should be noted that the proposal would also benefit Youth, Seniors and Riders with Disabilities by making travel on Sounder more affordable and simplifying fares for these riders by aligning fare levels with those on Sound Transit's Link and ST Express services and with fares on King County Metro.

This proposal would have no adverse impact on minority or low-income riders; therefore, it will not result in any disparate impact or disproportionate burden on these riders.

*Source: King County Metro, Fourth Quarter 2019 ORCA LIFT Report.

Public Engagement

Sound Transit conducted public engagement for this proposed fare change that primarily consisted of an on-line, translated survey that was available from November 19 through December 6, 2020. The public were also notified of alternative ways to provide feedback that included:

- Emailing fares@soundtransit.org;

- Calling Sound Transit’s Customer Service line or Language Link lines; or
- Providing comment at public hearing held on December 3rd.

Promotion of the opportunities for public comment, and public notification of the proposed changes included:

- Audio announcements by Station Agents at Sounder stations
- Dedicated web page at [Soundtransit.org/farechange](https://soundtransit.org/farechange) with information and fact sheets provided in seven priority languages (Spanish, Korean, Vietnamese, Chinese, simplified Chinese, Russian and Tagalog), and notices about the change on the [Soundtransit.org](https://soundtransit.org) home page.
- Passenger notices (Text/SMS and email) were sent on November 19, 2020, and November 30, 2020, to over 12,512 recipients who have opted to receive updates concerning Sounder service.
- Email notifications to 77 community-based organizations and Agency partners detailing the proposed change, and public comment opportunities, including a virtual public hearing on December 3, 2020. Resolution No. R2020-28 Page 3 of 3 Staff Report
- Social media notifications posted on Facebook, Twitter and the Sound Transit Blog, The Platform.
- Press releases delivered regarding the launch of the comment period, as well as in advance of the public hearing.

Comments received included 571 completed responses to the online survey, eight emails, one letter and one comment at the December 3, 2020, Public Hearing.

Public feedback received showed clear support for this proposal. Overall, 77 percent of survey respondents supported the fare proposal, while 88 percent of the reduced fare respondents (Low Income Adult (ORCA LIFT), Youth, Seniors, and People with Disabilities) who ride Sounder supported the proposal. Seventy-six percent of reduced-fare respondent Sounder riders said they would be more likely to ride Sounder as a result of the fare decrease, and 81 percent said it would make it easier to pay their fare. Of the eight email comments received by Sound Transit, five supported the proposal and three addressed other issues. One letter was received expressing support for the proposal by the member organizations of the Transit Access Stakeholders Coalition: The Transportation Choices Coalition, the Transit Riders Union, Hopelink, Feet First and the Sierra Club. The one public comment at the December 3, 2020, Public Hearing was in support of this proposal.

All public feedback received is detailed in the [Sounder 2021 Fare Change Public Engagement Report](#).