

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

Executive Summary

The opening of the East Link Starter Line Link 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 newly adopted *Disparate Impact and Disproportionate Burden* policy ([Board Resolution No. R2022-19](#)), a Title VI service equity analysis was completed at two levels of analysis. The first evaluated the East Link Starter Line service change. The second systemwide analysis compared benefits and impacts to Title VI-protected & non-protected populations.

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 2 Line will eventually extend to Lynnwood as part of the Lynnwood Link Extension and to Downtown Redmond as part of the Downtown Redmond Link Extension. The East Link Extension was originally scheduled to open in mid-2023 and the Downtown Redmond Link Extension (Redmond Technology to Downtown Redmond) was supposed to open in 2024. However, unforeseen construction quality issues pushed back the schedule for both extensions. 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 will be completed by early 2024. Sound Transit could open this segment in 2024 as the East Link Starter Line. By opening a portion of the line earlier, Sound Transit can provide more immediate benefits to residents by opening rail access to essential jobs, educational institutions, healthcare facilities, and other important destinations. It also allows 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.

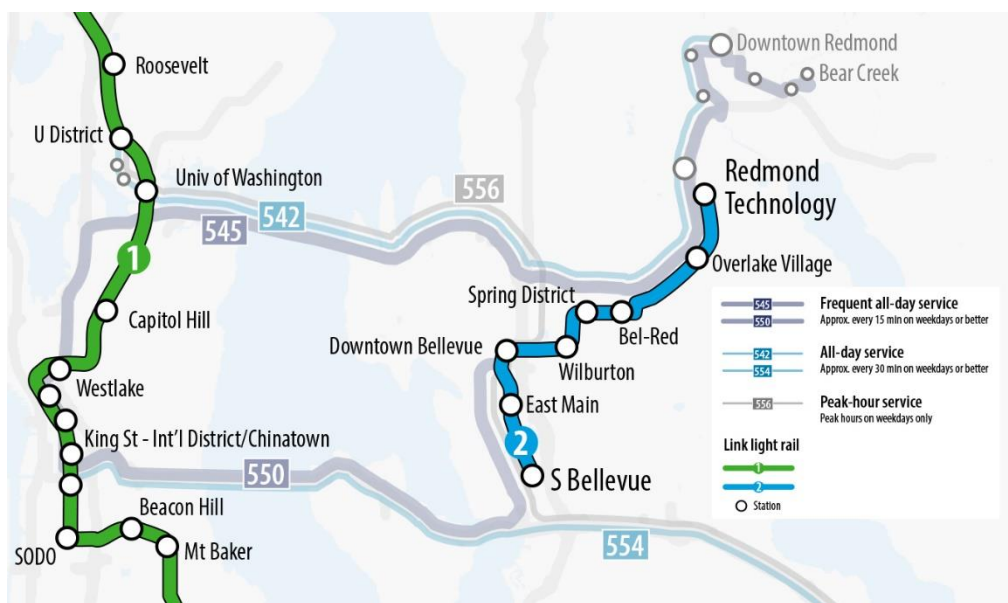


Figure 1: East Link Starter Line, eight new stations and the Sound Transit Express Eastside network

The East Link Starter Line Title VI Service Equity Analysis only examines the East Link Starter Line segment of the East Link Extension. Other 2 Line extensions, including the full East Link Extension, the Downtown Redmond Link Extension, and the Lynnwood Link Extension, will undergo separate

SAFE analyses. 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 Starter Line on a route-by-route basis and found no adverse effects. The East Link Starter 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 Starter 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 Starter 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 2021 and September 2024.

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

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

Route	Service Change	Title VI-Protected Populations	Adverse Effects	Mitigations
East Link Starter Line	<p>Open an East Link Starter Line in spring 2024 between South Bellevue and Redmond Technology Link Stations before the opening of the full East Link Extension and the Downtown Redmond Link Extension.</p> <p>ST would open eight new stations in South Bellevue, East Main, Bellevue Downtown, Wilburton, Spring District/120th, Bel-Red/130th, Overlake Village and Redmond Technology.</p>	<ul style="list-style-type: none"> • Minority: District average: 42.7% East Link Starter Line service area: 46.9% • Low-Income: ST District average: 20.7% East Link Starter Line service area: 11.9% 	<ul style="list-style-type: none"> • No disparate impact • No disproportionate burden 	N/A

The East Link Starter Line does not result in any local or regional service restructuring. The planned bus restructuring will occur when the full 2 Line opens. 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. King Country Metro will work together to finalize these service changes and develop a SAFE closer to the opening of the full 2 Line. The East Link Starter 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 Starter 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 Starter 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 Starter 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 Starter Line and associated changes. The East Link Starter 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 - Environmental Justice Review

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. Therefore, the East Link Extension would not result in any impacts that would be considered disproportionately high and adverse to minority and low-income populations under Presidential Executive Order (EO) 12898 and the U.S. Department of Transportation Order to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order).

Under the DOT Order, the benefits of a proposed transportation project may be considered when determining if any disproportionately high and adverse effects on minority and low-income populations would occur. The East Link Extension would have several beneficial effects, particularly for minority and low-income populations, 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. The FEIS determined that while all populations within the project's service area would realize these benefits to the same extent, they would accrue to a higher degree to minority and low-income populations. These benefits further support the conclusion that the East Link Project would not result in disproportionately high and adverse effects on minority and/or low-income populations.

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 & 2024 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 reviewing the opportunity to open a 6.3-mile segment of the East Link Extension between South Bellevue Station and Redmond Technology Station before the opening of the full extension. Known as the East Link Starter Line, this segment is scheduled to be completed in early 2024 and would have direct access to Operations & Maintenance Facility (OMF) East.



Figure 2: East Link Extension map

In January 2023, Sound Transit presented the East Link Starter Line to the Board for their consideration and comment, and the Board instructed Sound Transit to move forward with East Link Starter Line analysis (Figure 3). This action authorized up to 6 million dollars to complete activities, paid for by the East King subarea. At the May 2023 Board update, Sound Transit shared results of the Title VI Service & Fare Equity analysis before beginning a public comment process in July 2023. On August 24, 2023, the Sound Transit Board approved opening the eight-station segment for service in Spring 2024 prior to completion of the full East Link Extension. In October 2023, the Sound Transit Board will consider approving the Starter Line Title VI Service Equity analysis.

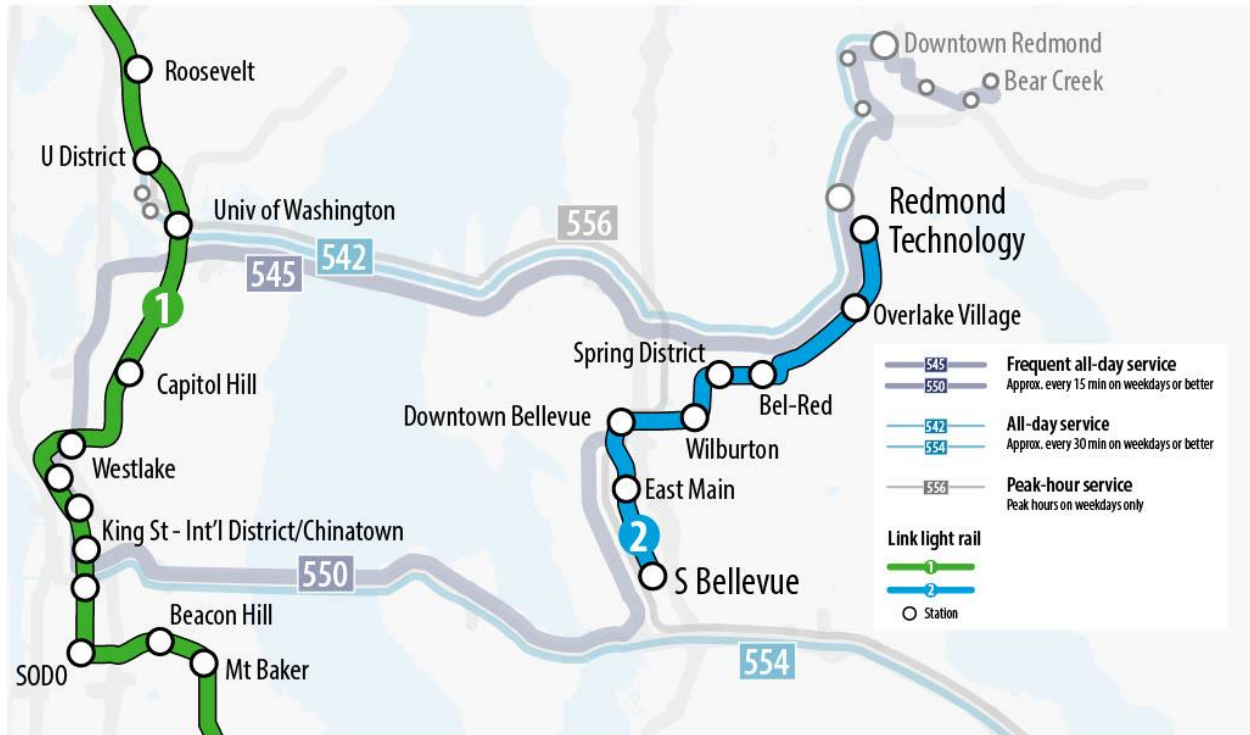


Figure 3: East Link Starter Line, 1 Line, and ST Express routes that serve the Eastside of the Puget Sound region

East Link Starter Line

Sound Transit's expansion of the existing Link network will enhance transit access and speed and reliability for the diverse neighborhoods along the new and existing corridor. The East Link Starter Line will bring new service to South Bellevue, Downtown Bellevue, Bel-Red and Overlake. The East Link Starter Line will operate within an area historically dense with transit service operated primarily by Metro. In addition, Bellevue Downtown Station is adjacent to the current Bellevue Transit Center, which is served by both King County Metro and Sound Transit bus service. Service will operate seven days a week from 6:30 AM to 9:15 PM with 10-minute headways.

No Bus Changes until Full 2 Line, Not Planned for Starter Line

No bus restructurings are planned with the East Link Starter Line. In anticipation of the opening of the East Link and Downtown Redmond Extension, King County Metro and Sound Transit collaborated on the East Link Connections process to plan a coordinated structure on the Eastside. Since the East Link Extension's opening was delayed and many of the service changes depend on connections in Seattle, Bellevue, and Downtown Redmond, implementation of the bus restructure has also been delayed to when the full 2 Line opens (East Link Extension and Downtown Red Extension). King County Metro and Sound Transit will work together to finalize these service changes closer to the opening. The partners will also develop a SAFE to support this planning effort.

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.

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

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 2020 designated census tracts as the geographic basis for assessing the Title VI populations.

Sound Transit uses 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 (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 overall. Table 3 shows Title VI population averages for the Sound Transit service area using the American Community Survey five-year estimates 2021 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	42.7%
Low Income	20.7%
Limited English Proficiency	10.4%

The maps below (Figure 4-6) 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.

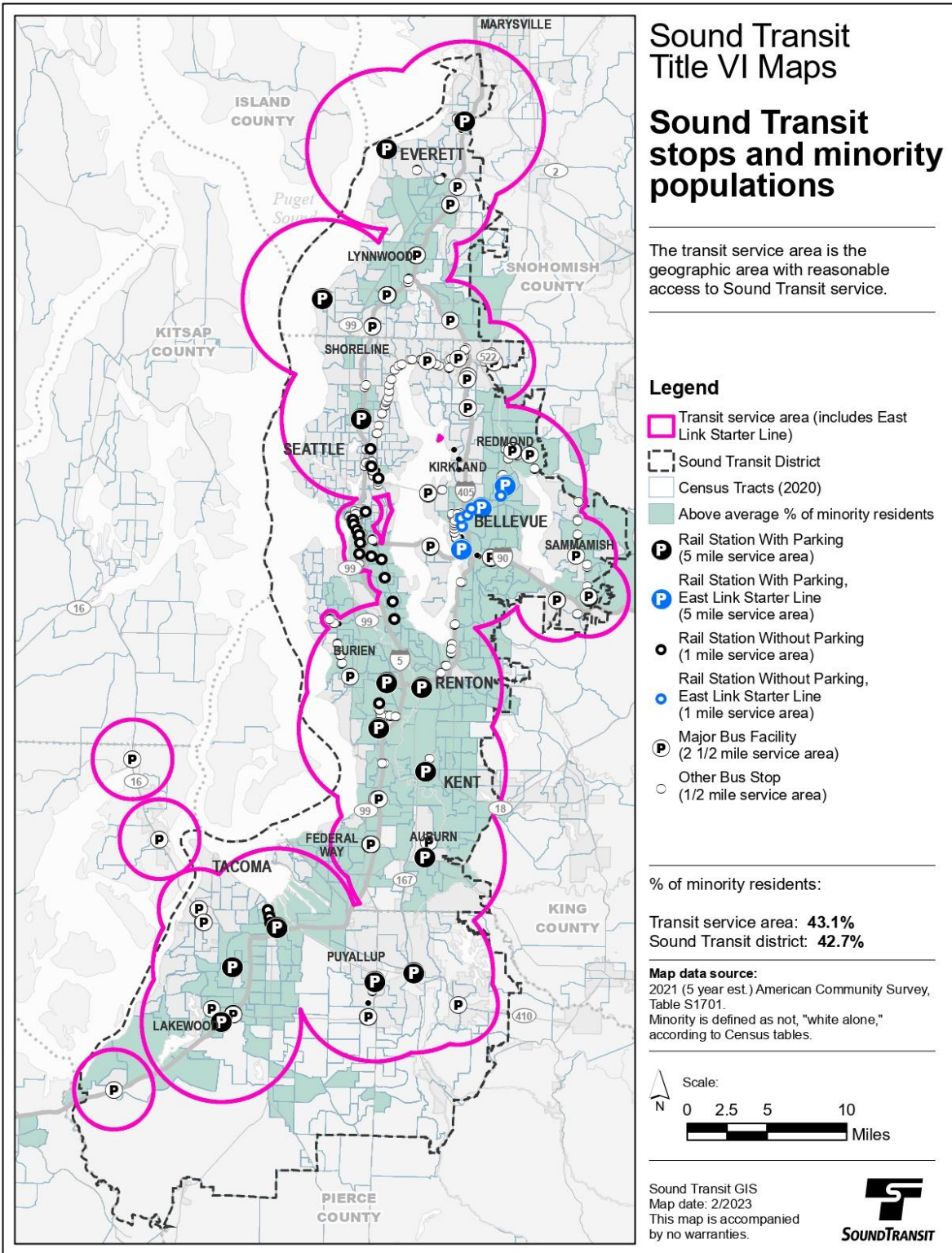


Figure 4: Map of Title VI minority population for Sound Transit service area

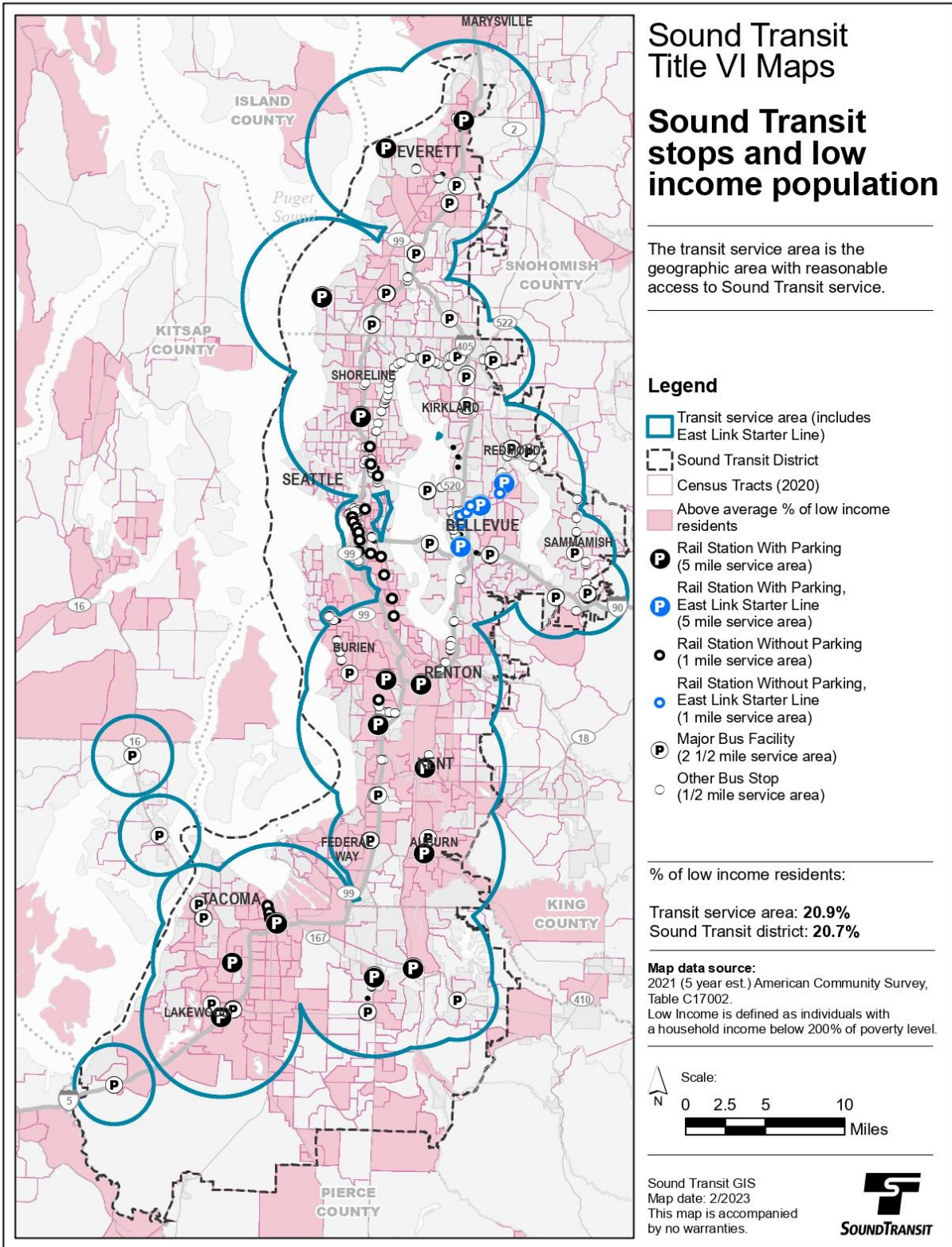


Figure 5: Map of Title VI low-income population for Sound Transit service area

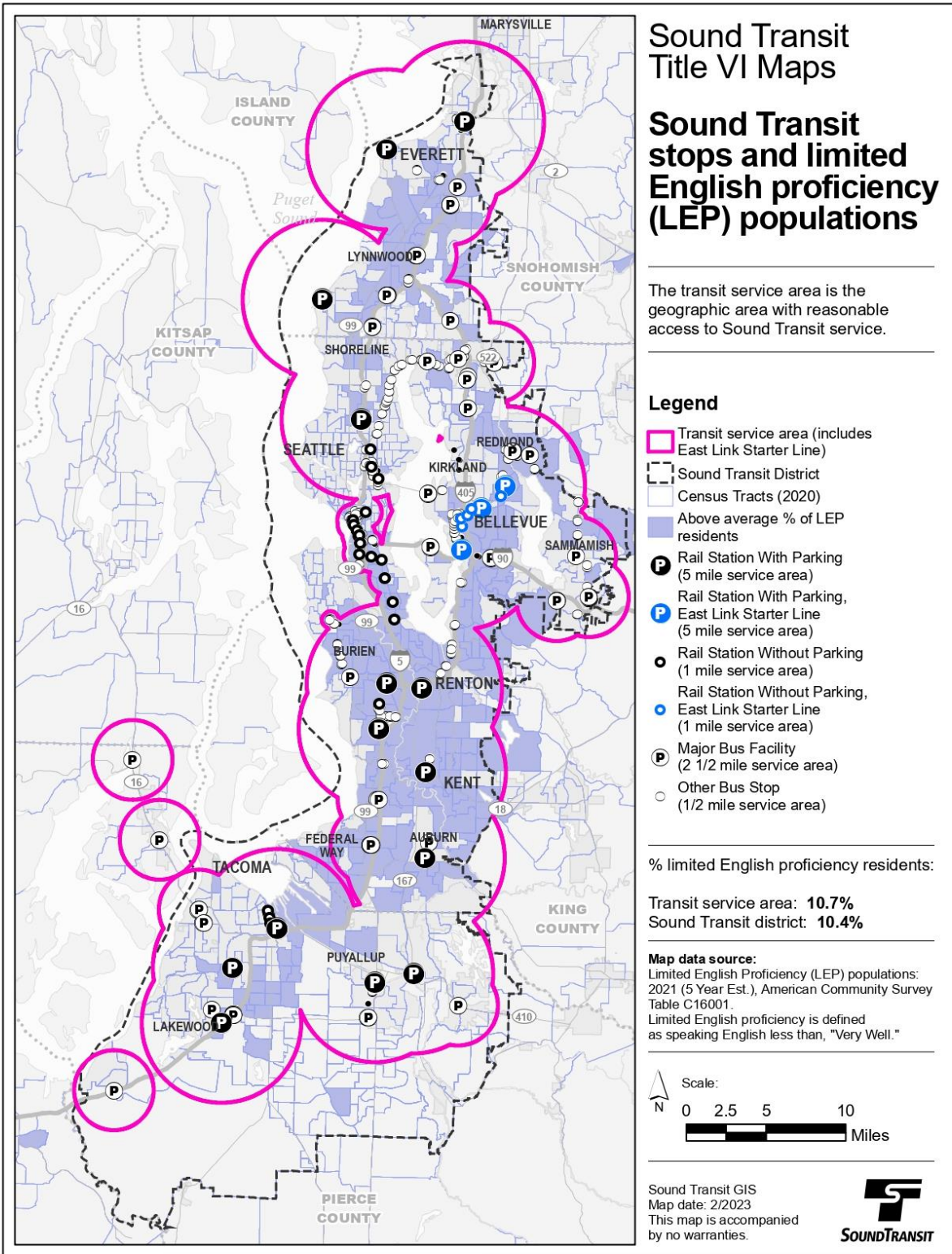


Figure 6: Map of Title VI limited English proficiency (LEP) population for Sound Transit service area

Title VI-Protected Populations by Route

Table 4 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 (Table 16).

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	40.7%	23.2%	11.1%
511	37.1%	18.8%	10.2%
512	37.7%	21.0%	10.7%
513	38.3%	20.5%	11.1%
522	32.1%	13.7%	7.6%
532	42.3%	20.9%	12.5%
535	39.4%	15.9%	11.0%
542	44.7%	17.9%	10.8%
545	48.5%	14.5%	11.4%
550	47.3%	17.5%	10.2%
554	46.1%	15.4%	9.8%
556	43.1%	15.4%	9.4%
560	56.9%	24.0%	18.7%
566	56.3%	23.3%	16.5%
574	55.2%	33.3%	14.3%
577	53.0%	26.3%	13.2%
578	45.2%	24.6%	11.1%
580	26.9%	18.0%	5.0%
586	51.1%	33.6%	12.4%
590	46.0%	29.0%	8.3%
592	52.6%	31.7%	9.5%
594	50.2%	32.6%	9.3%
595	37.9%	24.4%	6.2%
596	21.5%	15.6%	3.1%
Commuter Rail			
N Line	37.5%	22.4%	10.4%
S Line	48.6%	26.3%	12.3%
Light Rail			
East Link Starter Line	46.9%	11.8%	11.8%
1 Line	45.1%	22.7%	11.6%
Streetcar			
T Line	44.0%	27.4%	8.6%
District Average	42.7%	20.7%	10.4%

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
Project Scoping	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.
Conceptual Development of Alternatives	Collaborate with the community about design ideas and priorities for East Link route and station alternatives.
DRAFT Environmental Impact Statement (DEIS)	Provide information to, and collect comments from, the public and agencies about the environmental consequences of building and operating the East Link project.
FINAL Environmental Impact Statement (FEIS)	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.
Cost Savings/Collaborative Design Process	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
Preferred Alternatives – Neighborhood Focused Engagement	Share information about the East Link preliminary engineering design phase with communities and invite input on the light rail alignment and station locations.
Final Design	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.
Construction	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.
Transition to Operations	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

Sound Transit planned various outreach, communications, and engagement tactics to inform riders about the proposed opening of the East Link Starter Line. These engagement activities included in-person and virtual engagement in July and August 2023. Sound Transit sought feedback from the public on the East Link Starter Line about both the overall opinion of the proposed opening and potential service features in the proposal. The following sections provide further information on each outreach effort.

2024 Service Plan Website & Online Open House Project Pages

Sound Transit Engagement created and hosted an easy-to-use online landing page where the public could share feedback on the 2024 Service Plan. The landing webpage introduced the 2024 Service Plan and linked to dedicated Online Open House (OOH) websites for the proposed service changes, grouped by North, East, and South project subareas. The East subarea OOH covered East King County, including Bellevue and Redmond. It contained information about the proposed 2024 opening of the East Link Starter Line, such as the eight proposed stations, estimated levels of service, and projected opening dates for the full 2 Line.

The East OOH included information about the East Link Starter Line SAFE Analysis, including a description of the analysis and a link to the PDF document. The SAFE Analysis provided planning context for the East Link Starter Line and data from evaluations of potential disparate impacts and disproportionate burden on low-income communities. While few OOH visitors provided feedback on the SAFE Analysis, the majority of those that did expressed support for Sound Transit’s work to evaluate impacts.

Additionally, the landing page was crosslinked with the website for the separate Lynnwood Link Connections project currently underway with King County Metro.

2024 Service Plan Survey

The East subarea OOH included a short survey for riders to share feedback on the proposed changes, including the opening of the East Link Starter Line. The survey prompted OOH visitors about the day(s) of the week and time(s) of day that they would be likely to ride the East Link Starter Line. The questions and their response options were:

1. *Do you have any comments or feedback to share with us on the proposal to open the 2 Line segment between South Bellevue Station and Redmond Technology Station as soon as spring 2024?*
[Comment box]
2. *Do you have any comments or feedback to share with us on the Service And Fare Equity (SAFE) Analysis?*
[Comment box]
3. *If the East Link Starter Line (2 Line) were to open in early as soon as spring 2024, which days would you be most likely to use this service? (Check all that apply)*
Weekdays
Weekends
4. *If the East Link Starter Line (2 Line) were to open as soon as spring in early 2024, which times would you be most likely to use this service? (Check all that apply)*
Early morning (6:30 - 8 a.m.)
Morning commute (8 - 10 a.m.)
Midday (10 a.m. - 3 p.m.)
Evening commute (3 - 6 p.m.)
Evening (6 - 9:15 p.m.)

A paper version of the East Link Starter Line online survey was also available at in-person Ambassador outreach events. The paper survey contained project information and a QR code link to the 2024 Service Plan landing page for more details. The same questions and open comment boxes from the online survey were available on the paper version.

System Engagement received a total of 186 survey responses for the East Link Starter Line. Of these, 161 were complete and 25 were partial. The open-ended comment responses indicated a large majority of support for the East Link Starter Line: 119 comments were in favor and only 10 voiced opposition. Prominent themes among the supporters were the positive regional impacts and the improved commute experience along SR 520. Other less prominent reasons for support given were the anticipated time savings and connections to other bus routes.

The survey results from the multiple-choice questions indicated that a similar percentage of survey respondents would be likely to ride the East Link Starter Line on weekdays (76.4%) and weekends (72.3%). Respondents indicated they would be most likely to ride the East Link Starter Line between the hours of 3 and 6 p.m., but most survey respondents reported they would be likely to ride during business hours and peak commute times.

Ambassador Outreach

In July, System Engagement dispatched Sound Transit staff Ambassadors to three locations in the East project area. Ambassadors were tasked with informing riders at high-traffic transit centers and

stations about the 2024 Service Plan and the opportunity for the public to share feedback about the features of the Plan. Ambassadors interacted with over 450 Eastside riders in person to encourage them to visit the Service Plan website and share their feedback.

Ambassadors set up in pairs at Bellevue Transit Center, Redmond Technology Station, and the bus stop at SR-520 & NE 40th St. At Bellevue Transit Center, Ambassadors targeted riders boarding buses at bus bays 3, 6, and 9. These riders would be traveling eastbound following a similar trajectory to the East Link Starter Line. At Redmond Technology Station and the bus stop at SR 520 & NE 40th St., Ambassadors looked for riders who were waiting to board buses traveling westbound along a similar trajectory to the East Link Starter Line.

Virtual Information Sessions

Sound Transit Engagement held two Virtual Information Sessions for the public to share feedback and questions and directly interact with the Service Plan team. Engagement held the meetings on Zoom, with no advance registration required to ensure greater ease of access to the public. Staff published the invitation and Zoom links to the information sessions on the 2024 Service Plan website, the Sound Transit Events Calendar, two SMS/email Passenger Notices, and a Sound Transit Press Release. Additionally, Engagement placed paid, geo-targeted ads on Facebook in English, Spanish, and Simplified Chinese.

The first information session occurred on Monday, July 17, from 6 p.m. to 7 p.m. Fourteen attendees joined the Zoom meeting. The main themes in attendee questions and comments were Link project timelines, bus integration with the 2 Line, operator availability for new service, and the state of 2 Line construction. Attendees were concerned about why no improvements were being proposed to the south subarea and curious about what the agency's plans were to address future Link service interruptions on the new extension to Lynnwood. However, they expressed support for increasing service on several ST Express routes as well as how to improve station safety and design. Attendees expressed gratitude for the meeting being held on Zoom and stated their satisfaction with the answers they received from staff.

The second information session occurred on Wednesday, July 26, from 6 p.m. to 7 p.m. Sixteen community members attended the meeting. Their questions focused on service and design details about the upcoming East Link Starter Line. Attendees had questions about operating hours, opening date, frequency of connecting bus service, and the "floating track" segments of the 2 Line across the I-90 bridge. There were also questions about future ST Express 522 connection with the 1 Line and additional support for maintaining ST Express 510 service. Attendees at this session were more enthusiastic about the Starter Line overall.

Social Media

The Social Media team placed geo-targeted advertisements in the North and East project areas. The ads were placed online on Facebook from July 11, 2023, to July 23, 2023. The ads were placed in English in both the North and East subarea sites, with in-language Spanish ads placed in the North and Chinese ads in the East. The Social Media team looked at language demographics in the project subareas to determine which in-language ads would be most appropriate. Ads are only placed in-language when there is a high population of speakers in the designated area. The ads performed well compared to ads from similar projects. The ads were shown over 137,000 times, with 52,034 people seeing them. Of these, 2,669 people clicked on the ads to visit the 2024 Service Plan project pages. The average cost per click of all the ads was under \$1. The standard to know if an

English language ad is performing well is \$1 per click, nearly all the translated ads averaged less than \$1 per click indicating a high level of engagement.

Stakeholder Toolkit

System Engagement shared a Stakeholder Toolkit municipal and nonprofit Community Based Organizations along the East Link Starter Line corridor. Each toolkit contained information about proposed changes, links to project websites, a schedule of upcoming public information sessions, and sample social media copy and images for sharing through organizational and member networks. Recipients included City of Bellevue, TransManage, and Move Redmond.

As part of the tactical execution of the public involvement plan, Sound Transit staff hosted public meetings and held briefings and drop-in sessions. The comments gathered at those public sessions helped the Sound Transit Board as it made decisions on East Link. Below is a snapshot of some of the engagement work, by the numbers through final design.





Individual Route Analysis

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 Start Line. The East Link Starter 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 Starter Line	<p>Open an East Link Starter Line between South Bellevue and Redmond Technology Link Stations in spring 2024 before the opening of the full East Link Extension and the Downtown Redmond Link Extension.</p> <p>ST would open eight new stations in South Bellevue, East Main, Bellevue Downtown, Wilburton, Spring District/120th, Bel-Red/130th, Overlake Village and Redmond Technology.</p>	Major	No	No	No

East Link Starter Line (Line 2)

Service Change Proposal

The East Link Starter Line is a new light rail line operating between South Bellevue Station and Redmond Technology Station. If the Starter Line is approved by the Sound Transit Board of Directors, it will open as early as spring 2024 with eight new Link light rail stations (Figure 7).

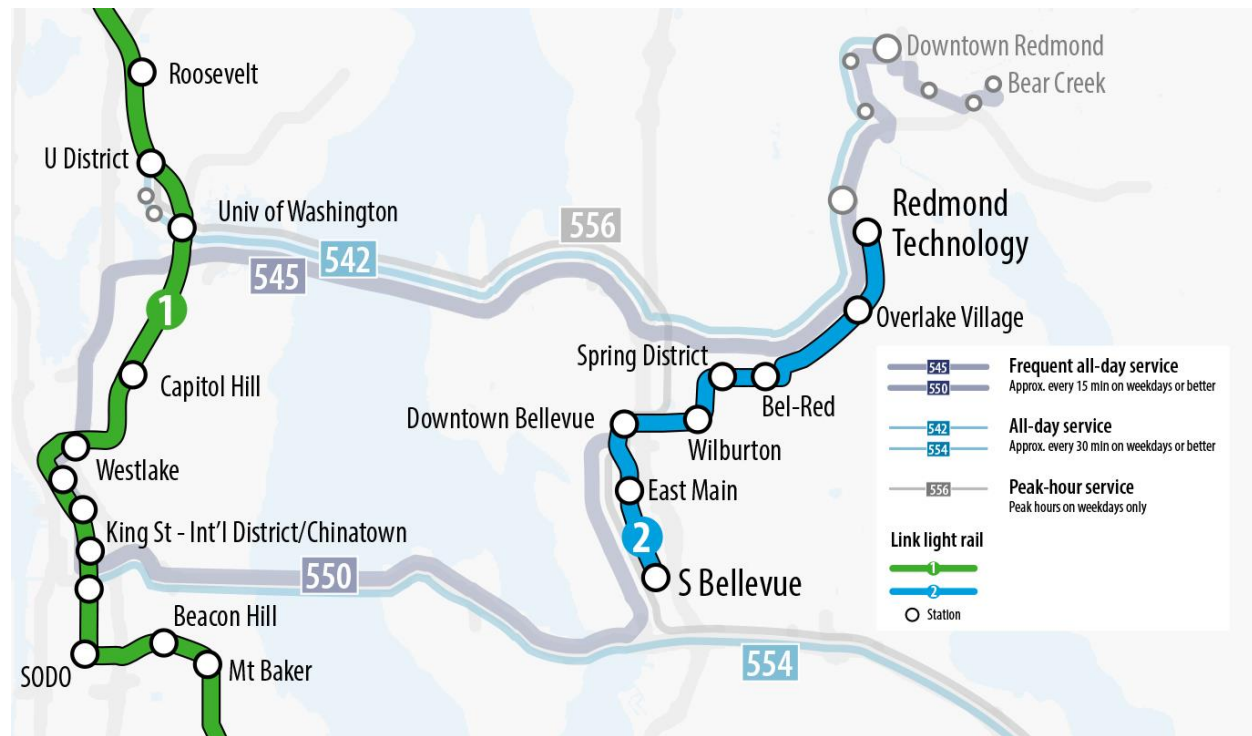


Figure 7: East Link Starter Line, eight new stations and the ST Express Eastside network

The East Link Starter Line service change adds service and opens regional access to high-capacity transit sooner than the opening of the East Link Extension. It expands travel options for existing and future passengers with a service area population of 393,539 people. Riders will have increased access and potentially more efficient connections to local resources for essential jobs, education, health care, food, shopping, and recreation. Riders could conveniently travel between South Bellevue, Downtown Bellevue, Bel-Red, Overlake and the Redmond Technology Center. The East Link Starter Line does not result in any local or regional service restructuring. The planned East Link Connections bus restructuring will occur when the full 2 Line opens.

The projected opening timeline for the remainder of the East Link Extension from South Bellevue to the International District/Chinatown is 2025. The full extension will provide a connection to the 1 Line. The opening of the East Link Starter Line prior to the entire East Link Extension requires a SAFE analysis as it was funded using Capital Improvement Grant (CIG) funding from the FTA.

When the 6.3-mile Starter Line opens, it will operate 7 days a week, every 10 minutes (Table 7). Sound Transit continues to evaluate how many hours of service will be provided per day based on available staffing levels.

Table 6: Approximate frequencies

Service Period	Proposed East Link Starter Line (2 Line) South Bellevue-Redmond Technology Station
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Weekdays, Saturday, Sunday	
Early AM	10 minutes
AM Peak	10 minutes
Midday	10 minutes
PM Peak	10 minutes
Evening	10 minutes

Title VI Analysis

The minority population in the East Link Starter Line service area (46.9%), less than 5% greater than in the ST District as a whole (42.7%) (Table 8), will not be adversely affected by any reduction of service. Therefore, the East Link Starter Line does not have a disparate impact. The low-income population, smaller in the East Link Starter Line service area (11.9%) than the ST District average (20.7%), will also not be adversely affected by a reduction of service. As such, there is no disproportionate burden. The LEP population is slightly higher in the East Link Starter Line service area (11.8%) than the ST District average (10.4%).

Table 8: Title VI Populations in the ST District and the East Link Starter Line service area

	Minority Population	Low-Income Population	Limited English Proficiency (LEP) Population
ST District	42.7%	20.7%	10.4%
East Link Starter Line service area	46.9%	11.9%	11.8%

The benefits would flow to a greater percentage of minority and LEP communities than what is reflected in the ST District average. Therefore, a high proportion of minority and LEP communities would receive the benefits. However, since the low-income population is lower in the East Link Starter Line service area than in the ST District, a relatively lower proportion of low-income individuals would accrue benefits.

See Figures 8-10 for maps of protected populations in the East Link Starter Line service area.

Mitigations

Mitigations are not necessary given no finding of a potential disparate impact or disproportionate burden.

Public Input

The East Link Starter Line Proposal and Title VI Service Equity Analysis were available for public comment from July 10 until August 6.¹ Fewer survey respondents opted to provide feedback on the Title VI Analysis than those who responded to the broader questions about the East Link Starter Line. A total of 79 participants shared feedback on the Title VI Analysis. The most prominent theme in their responses was support or appreciation for Sound Transit undertaking the effort, with 16 responses expressing this. In contrast, 10 survey responses expressed a desire to see service improvement implementation prioritized before any changes to fares. Below are some survey comments that reflect these themes:

“We are very please that you include this analysis as part of the decision making process. Well done.” (East Respondent 101)

¹ This schedule and scope for public comment are subject to change.

“Thank you for the SAFE analysis. I agree with the findings and support the recommendations.” (East Respondent 72)

“I would prioritize great service over low fares. Fares can be lowered and accommodations offered. Bad service cannot be fixed and you will lose support. I think the current decision is the right one.” (East Respondent 97)

“I understand the SAFE process is important, but please do not delay opening service to complete the study. Fare changes can be made after the line is already running!” (East Respondent 110)

“I like your service plans and am impressed with the equity analysis.” (Email respondent 65)

Conclusion

The Title VI analysis found no adverse effects. There is also no determination of disparate impact or disproportionate burden.

Sound Transit Systemwide Service Analysis

The systemwide analysis evaluates service reductions and service additions separately. While a systemwide analysis is not required per FTA Circular 4702.1B regarding new starts, small starts or capital programs, Sound Transit’s Title VI program requires one to be conducted with each SAFE. The analysis shows 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 2021 to September 2024. The following sections step through the analysis process for each analysis.

Identifying Systemwide Service Additions & Reductions

The first step in the analysis identifies service reductions and additions by route. The following table shows the total change in scheduled weekly revenue hours between September 2021 and September 2024 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 policy defines the period for the analysis to evaluate all changes implemented in the past two years and proposed changes for the next year. The baseline for this analysis is October 2021 (Fall 2021 service change), which was before ST implemented emergency reductions due to operator shortages. For reference, table 9 shows revenue hours for each service change, including unscheduled emergency reduction, during the analysis period.

Overall, the table shows a modest increase in service from October 2021 (Fall 2021 service change) through September 2024. The recovery was interrupted by ongoing operator shortages; however, modest growth in revenue service hours can still be seen.

Table 9: Scheduled weekly revenue hours by service change from September 2021 - September 2024

Route	Oct. 2021	Mar. 2022 ²	Oct. 2022	Mar. 2023	Sept. 2023	Mar. 2024	Sept. 2024	Difference Sept. 2024 and Oct. 2021	Benefit or Reduction
1 Line	1,985	2,130	2,128	2,190	2,190	2,190	2,454	469	Benefit
2 Line	0	0	0	0	0	700	700	700	Benefit
510	193	183	171	172	172	172	0	-193	Reduction
511	142	113	95	0	0	0	0	-142	Reduction
512	1,035	951	898	922	922	922	1,185	150	Benefit
513	118	123	116	96	96	96	216	98	Benefit
522 ³	1,019	1,003	978	975	975	975	975	-44	Reduction
532	135	133	129	125	125	125	150	15	Benefit

² Emergency reduction due to operator shortages. Some reductions were made in November 2021 and formalized in March 2022

³ The Route 522 routing change to S Shoreline Station (Woodinville to S Shoreline Station) will be implemented with the opening of the full 2 Line (East Link Extension and Downtown Redmond Link Extension), which will occur after September 2024. The change in hours is included in the systemwide analysis to provide a complete picture of the Lynnwood Link restructured service changes.

535	420	412	406	398	398	398	435	15	Benefit
542	416	417	415	427	427	427	427	11	Benefit
545	1,204	1,084	1,080	1,077	1,077	1,077	1,077	-127	Reduction
550	997	896	885	883	883	883	883	-114	Reduction
554	712	666	664	664	664	664	664	-48	Reduction
556	102	103	108	108	108	108	108	6	Benefit
560	665	656	697	673	673	673	673	8	Benefit
566	334	209	194	196	196	196	196	-137	Reduction
574	763	768	772	772	772	772	772	9	Benefit
577	315	271	287	274	274	274	274	-41	Reduction
578	714	687	706	708	708	708	708	-6	Reduction
580	42	13	13	13	13	13	13	-29	Reduction
586	116	127	120	126	126	126	126	10	Benefit
590	430	323	329	329	329	329	329	-101	Reduction
592	241	177	171	171	171	171	171	-69	Reduction
594	856	842	862	861	861	861	861	4	Benefit
595	55	54	61	61	61	61	61	6	Benefit
596	44	46	42	42	42	42	42	-3	Reduction
N Line	26	26	26	26	26	26	26	0	No Change
S Line	165	177	183	183	183	183	183	18	Benefit
T Line	195	195	191	480	480	480	480	285	Benefit

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 2021 and September 2024 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 2021 to September 2024

Route	Change in Weekly Revenue Hours	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
510	-193	330,000	134,300	195,700	76,500	253,500
511	-142	409,600	151,900	257,700	76,900	332,700
522 ⁴	-44	138,100	44,300	93,800	18,900	119,200
545	-127	241,400	117,000	124,400	35,000	206,400
550	-114	110,000	52,000	58,000	19,200	90,800
554	-48	170,400	78,600	91,800	26,200	144,200
566	-137	323,800	182,200	141,600	75,400	248,400
577	-41	155,600	82,500	73,100	40,900	114,700
578	-6	273,600	123,800	149,800	67,300	206,300
580	-29	85,400	23,000	62,400	15,400	70,000
590	-101	153,200	70,500	82,700	44,400	108,800
592	-69	158,800	83,500	75,300	50,300	108,500
596	-3	65,500	14,100	51,400	10,200	55,300
Population Percentage Affected by Reduction ⁵		29%	29%	29%	27%	30%

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.

⁴ The Route 522 routing change to S Shoreline Station (Woodinville to S Shoreline Station) will be implemented with the opening of the full 2 Line (East Link Extension and Downtown Redmond Link Extension), which will occur after September 2024. The change in hours is included in the systemwide analysis to provide a complete picture of the Lynnwood Link restructure service changes.

⁵ Percentage affected by reduction is calculated by summing the populations served by each route with a reduction, then dividing by the sum of populations served by all routes to calculate a percentage. Note that some routes have overlapping service areas.

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: 29%
- Non-Minority population adversely affected: 29%
- Low-Income population adversely affected: 27%
- Non-Low-Income population adversely affected: 30%

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 1 percent 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
29%	29%	$29\% \div 29\% = 1\%^1$	20% or greater
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 eight percent 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
27%	30%	$27\% \div 30\% = 8\%^1$	20% or greater
¹ In order to compare with the policy threshold the ratio calculation is shown as the difference from 100%.			

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 service area's minority or low-income population benefited from the major service additions to the percentage of the district's non-minority or non-low-income population benefited.

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 2021 and September 2024 for each route with a service addition. The population columns then identify the total Title VI-protected and non-Title VI-protected populations affected by the service addition for each route.

Table 13: Populations benefited by service addition, September 2021 to September 2024

Route	Change in Weekly Revenue Hours	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
1 Line	469	968,100	436,800	531,300	219,600	748,500
2 Line	700	393,539	184,688	208,851	46,634	346,905
512	150	549,100	207,200	341,900	115,100	434,000
513	98	496,300	189,900	306,400	101,600	394,700
532	15	351,700	148,800	202,900	73,500	278,200
535	15	242,600	95,600	147,000	38,500	204,100
542	11	88,600	39,600	49,000	15,900	72,700
556	6	134,000	57,700	76,300	20,600	113,400
560	8	189,200	107,600	81,600	45,400	143,800
574	9	340,700	188,200	152,500	113,600	227,100
586	10	189,200	96,700	92,500	63,500	125,700
594	4	238,500	119,800	118,700	77,800	160,700
595	6	262,700	99,600	163,100	64,200	198,500
S Line	18	1,221,400	593,900	627,500	321,000	900,400
T Line	285	302,800	133,100	169,700	82,900	219,900
Population Percentage Benefiting by Addition ⁶		67%	67%	66%	69%	66%

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.

⁶ Percentage benefiting from service addition calculated by summing the populations served by each route with a service addition, then divided by the sum of populations served by all routes to calculate a percentage. Note that some routes have overlapping service areas.

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: 67%
- Non-Minority population benefiting: 66%
- Low-Income population benefiting: 69%
- Non-Low-Income population benefiting: 66%

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 103% percent is greater than the 80 percent or less threshold, no disparate impact/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
67%	66%	$67\% \div 66\% = 103\%$	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 104% percent is 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
69%	66%	$69\% \div 66\% = 104\%$	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 protected populations. For service reductions, the adverse impacts to protected populations do not exceed 20% for protected populations. Therefore, the systemwide analysis did not identify any adverse effects on protected populations over September-March 2023.

Conclusion

This report documents the Title VI Service and Fare Equity Analysis required for the East Link Starter 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 Starter Line would offer a significant opportunity to provide more transit service on the Eastside. Based on the above analyses, there were no findings for disparate impacts or disproportionate burdens and no mitigations are necessary.

Appendix

Table 16: ST Service Area Title VI routes and populations

Route	Total Population	Minority Population		Non-Minority Population	Limited English Proficiency (LEP) ⁷		Low-Income Population ⁸		Non-Low Income
1 Line	968,100	436,800	45.1%	531,300	36,700	11.1%	219,600	22.7%	748,500
2 Line	393,539	184,688	46.9%	208,851	41,900	10.2%	46,634	11.8%	346,905
510	330,000	134,300	40.7%	195,700	58,600	10.7%	76,500	23.2%	253,500
511	409,600	151,900	37.1%	257,700	55,100	11.1%	76,900	18.8%	332,700
512	549,100	207,200	37.7%	341,900	10,500	7.6%	115,100	21.0%	434,000
513	496,300	189,900	38.3%	306,400	43,900	12.5%	101,600	20.5%	394,700
522	138,100	44,300	32.1%	93,800	26,700	11.0%	18,900	13.7%	119,200
532	351,700	148,800	42.3%	202,900	9,600	10.8%	73,500	20.9%	278,200
535	242,600	95,600	39.4%	147,000	27,400	11.4%	38,500	15.9%	204,100
542	88,600	39,600	44.7%	49,000	11,200	10.2%	15,900	17.9%	72,700
545	241,400	117,000	48.5%	124,400	16,600	9.8%	35,000	14.5%	206,400
550	110,000	52,000	47.3%	58,000	12,600	9.4%	19,200	17.5%	90,800
554	170,400	78,600	46.1%	91,800	35,400	18.7%	26,200	15.4%	144,200
556	134,000	57,700	43.1%	76,300	53,600	16.5%	20,600	15.4%	113,400
560	189,200	107,600	56.9%	81,600	48,900	14.3%	45,400	24.0%	143,800
566	323,800	182,200	56.3%	141,600	20,500	13.2%	75,400	23.3%	248,400
574	340,700	188,200	55.2%	152,500	30,300	11.1%	113,600	33.3%	227,100
577	155,600	82,500	53.0%	73,100	4,300	5.0%	40,900	26.3%	114,700
578	273,600	123,800	45.2%	149,800	23,400	12.4%	67,300	24.6%	206,300
580	85,400	23,000	26.9%	62,400	12,700	8.3%	15,400	18.0%	70,000
586	189,200	96,700	51.1%	92,500	15,000	9.5%	63,500	33.6%	125,700
590	153,200	70,500	46.0%	82,700	22,300	9.3%	44,400	29.0%	108,800
592	158,800	83,500	52.6%	75,300	16,300	6.2%	50,300	31.7%	108,500
594	238,500	119,800	50.2%	118,700	2,000	3.1%	77,800	32.6%	160,700
595	262,700	99,600	37.9%	163,100	40,300	10.4%	64,200	24.4%	198,500
596	65,500	14,100	21.5%	51,400	150,800	12.3%	10,200	15.6%	55,300
N Line	388,300	145,600	37.5%	242,700	4,700	12.4%	86,800	22.4%	301,500
S Line	1,221,400	593,900	48.6%	627,500	186,500	11.9%	321,000	26.3%	900,400
T Line	302,800	133,100	44.0%	169,700	112,100	11.6%	82,900	27.4%	219,900
ST District Average	3,306,990 ⁹	1,412,085	42.7%	1,894,905	343,927	10.4%	684,547	20.7%	2,622,443

⁷ Limited English is defined as speaking English, "Less than very well."

⁸ Low-Income is defined as a 200% poverty level and below.

⁹ Published district total population estimate, 2022.

Route-Level Title VI Population Maps

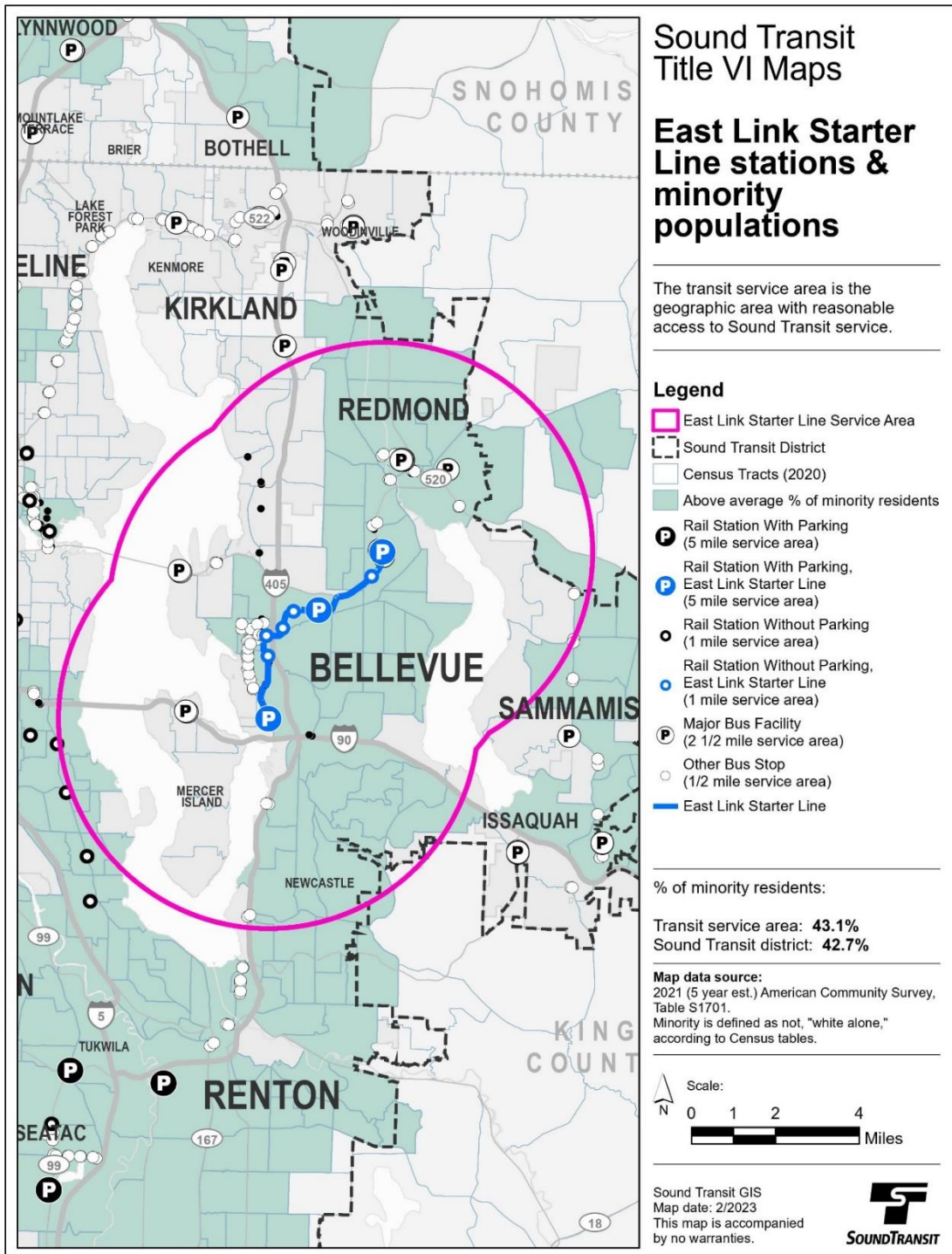


Figure 8: East Link Starter Line stations and minority populations

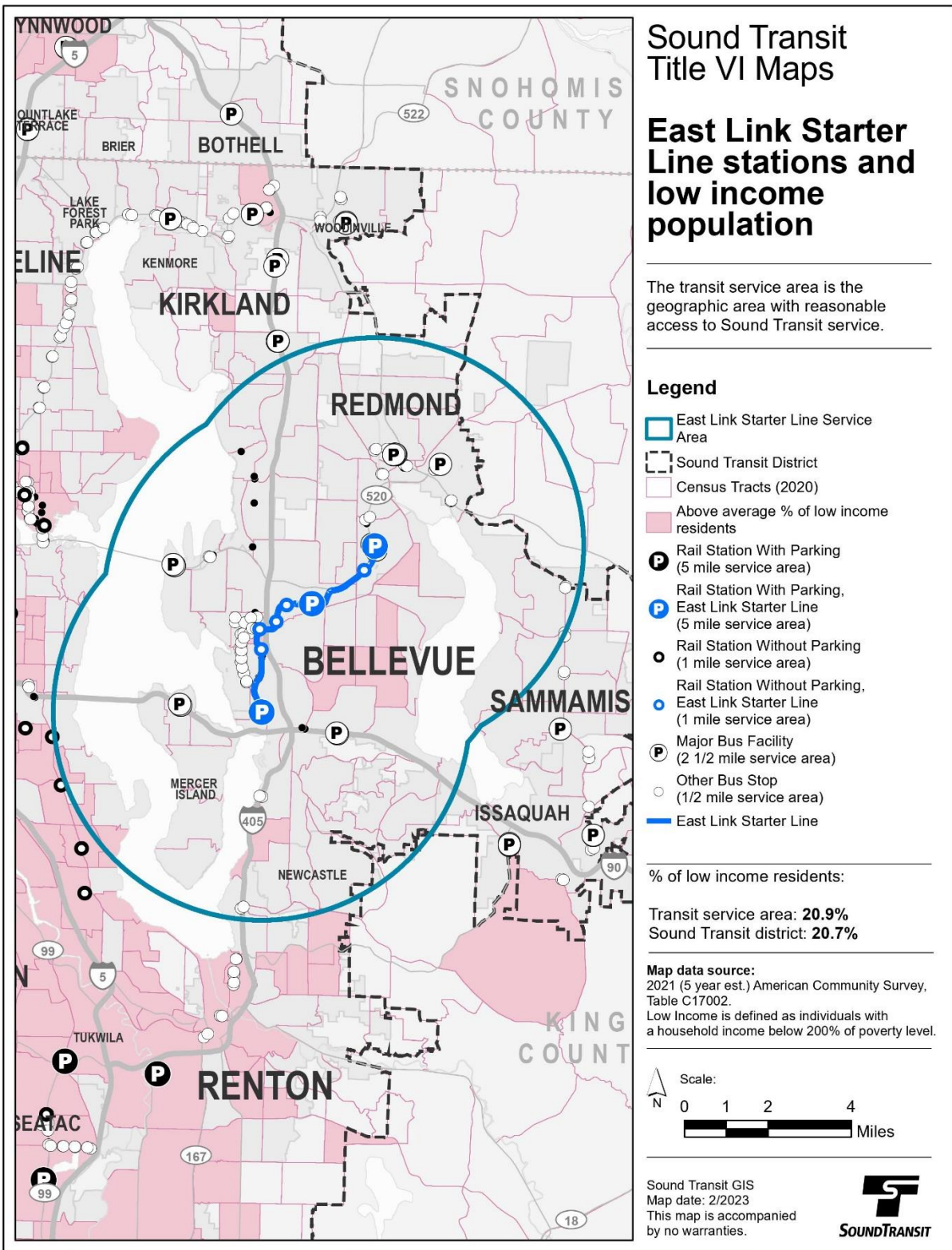


Figure 9: East Link Starter Line stations and low-income populations

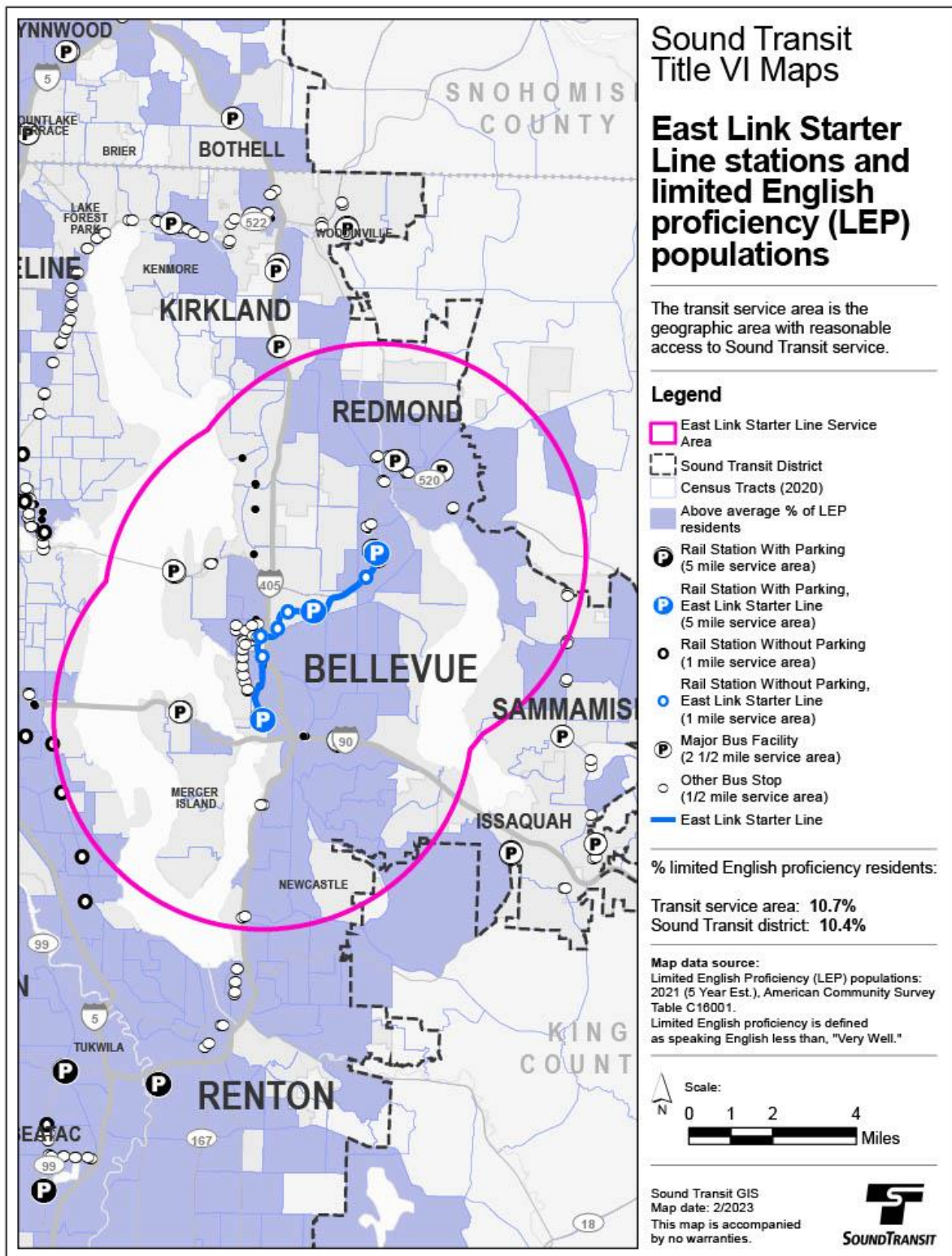


Figure 10: East Link Starter Line stations and limited English proficiency (LEP) populations