

**Downtown Redmond Link
Extension
Title VI Service & Fare Equity**

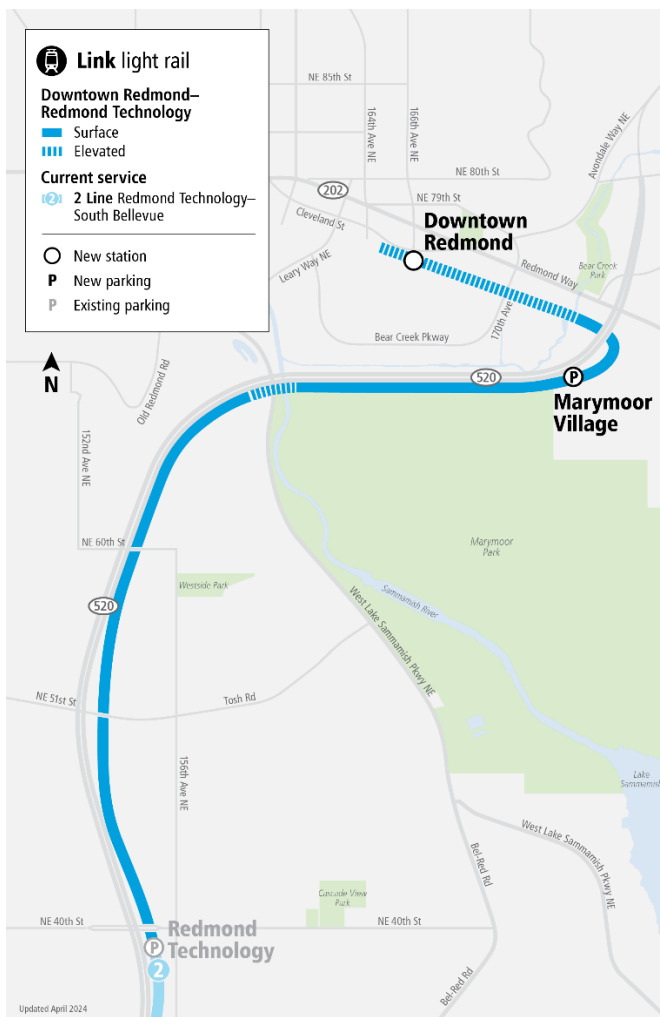
Executive Summary

The opening of the Downtown Redmond Line Extension (DRLE) 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 at two levels of analysis. The first evaluated the DRLE service change. The second systemwide analysis compared benefits and impacts to Title VI-protected & non-protected populations.

The DRLE is a part of the larger [East Link Extension project](#), and adds two new light rail stations in southeast Redmond, serving Marymoor Village near Marymoor Park, and in the downtown residential and retail core (Figure 1). This project will open in 2025 and will make 3.4 miles of new light rail with two new stations available. There will be 1,400 parking stalls at Marymoor Village Station, and the service will provide direct connections to Overlake, Bellevue, Mercer Island, downtown Seattle, University of Washington, Northgate, and Lynnwood.

Figure 1 DRLE, two stations and the Sound Transit Express Eastside network



The DRLE Title VI Service Equity Analysis has two components, an individual route analysis and a systemwide analysis. The **individual route analysis** evaluates the service change associated with the DRLE at a route-level. Adding new stations to a route qualifies as a major service change subject to Title VI analysis. In this case, the analysis found 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.

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 DRLE 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. Therefore, the systemwide analysis does not identify any disparate impacts or disproportionate burdens based on the cumulative service changes implemented between September 2022 and September 2025.

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

Table 1: Summary of DRLE Title VI Service Equity Analysis

Route	Service Change	Title VI-Protected Populations	Adverse Effects	Mitigations
DRLE	Open the DRLE, which includes two new light rail stations.	<ul style="list-style-type: none"> Minority: Sound Transit (ST) District average: 40.5% DRLE service area: 45.3% Low-Income: ST District average: 19.8% DRLE service area: 12.0 	<ul style="list-style-type: none"> No disparate impact No disproportionate burden 	N/A

The DRLE SAFE does not include a fare change and associated equity analysis because the existing fare structure will not change.

Sound Transit sought public feedback on the DRLE as a part of the 2024 and 2025 Annual Service Plan processes. The public generally provided only positive feedback on the East Link Extension, and those comments related directly to the DRLE expressed appreciation and support for the extension into downtown Redmond.

Introduction

This Service and Fare Equity (SAFE) Analysis is being conducted for the Downtown Redmond Link Extension (DRLE) segment of Sound Transit's Link light rail. 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 DRLE and associated changes. This SAFE does not include a fare change and associated 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.

Sound 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 (of which DRLE is a part) 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 2018 Addendum focused on the DRLE. The addenda addressed potential refinements developed during final design of the East Link Extension and new project-related environmental information. The addenda determined that potential refinements to the project would not substantially change the analysis of significant impacts and alternatives in the existing environmental documents and no new significant environmental impacts would result, and no supplemental EIS was required.

The Central Puget Sound Transit Context

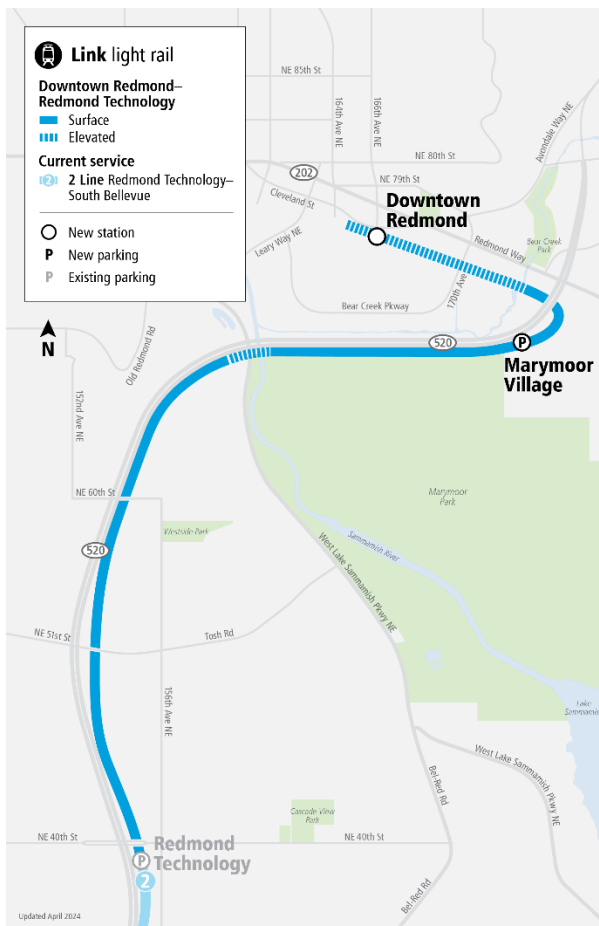
As a regional transit provider, Sound Transit offers regional connections service between major population and employment centers in King, Pierce, and Snohomish counties. Sound Transit's district stretches 1,080 square miles and serves about three million people or 40% of the state's population. Sound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

East Link & 2025 Planning Context

Downtown Redmond Link Extension Context

At 3.4 miles long, the DRLE includes two stations that continue the East Link Starter Extension (Figure 2). The original timeline had the extension open in 2024, though the current opening date is trending toward a spring 2025 start. This project will continue progress on the overall East Link Extension. On October 24, 2024, the Sound Transit Board will consider approving the DRLE Service Equity analysis.

Figure 2: East Link Extension map



Downtown Redmond Link Extension

Sound Transit's expansion of the existing Link network will enhance transit access, speed, and reliability for the diverse neighborhoods along the new and existing corridor. The DLRE will bring service to downtown Redmond and make further progress on the overall East Link Extension. Service will operate seven days a week from 5:31 AM to 9:34 PM with 10-minute headways.

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

No bus restructurings are planned with the DRLE. 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. 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. These policies are contained in the Public Participation Plan adopted as part of the Title VI Program.

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	5.0

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 2022 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 (Figure 4 through Figure 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 3: Map of Title VI minority population for Sound Transit service area

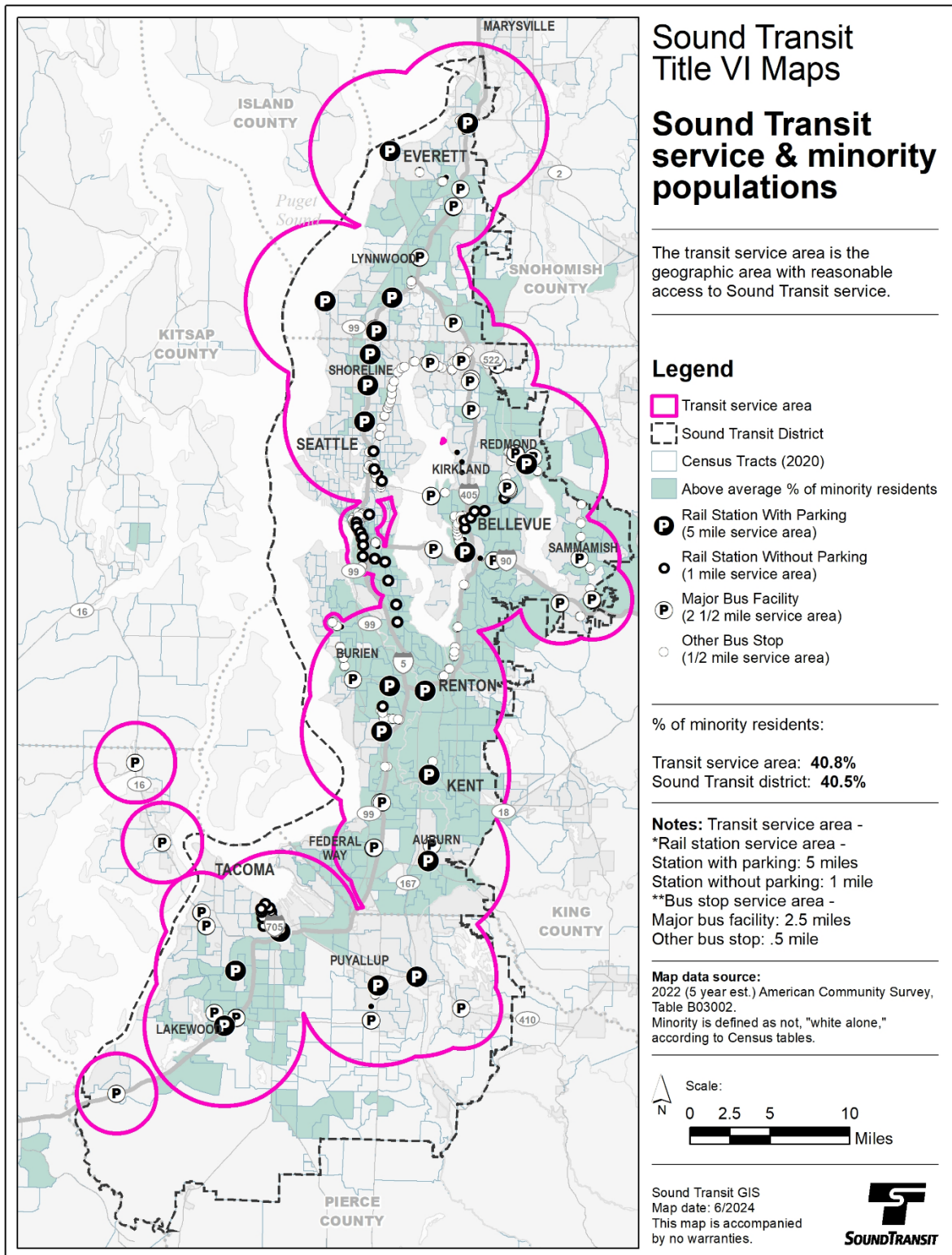


Figure 4: Map of Title VI low-income population for Sound Transit service area

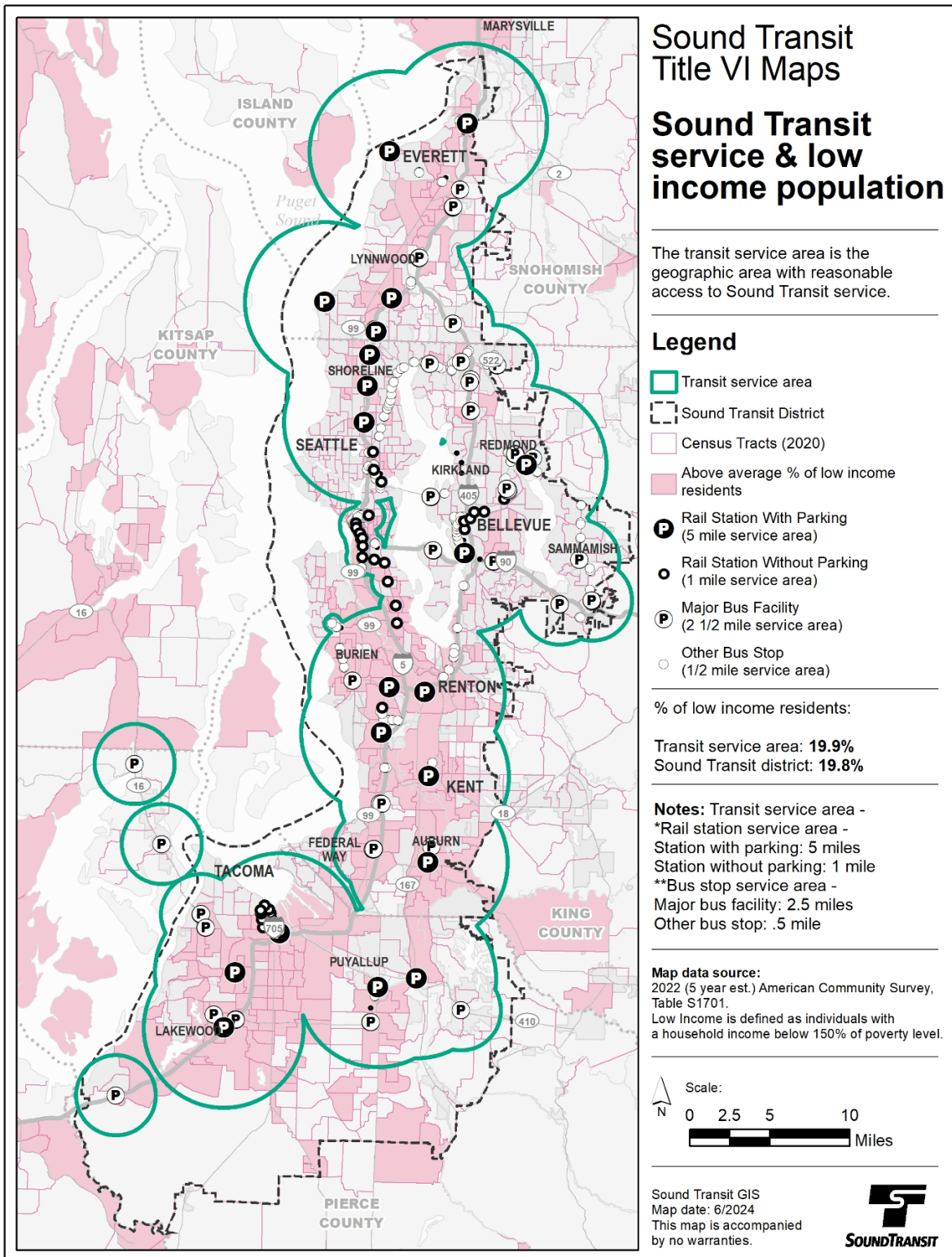
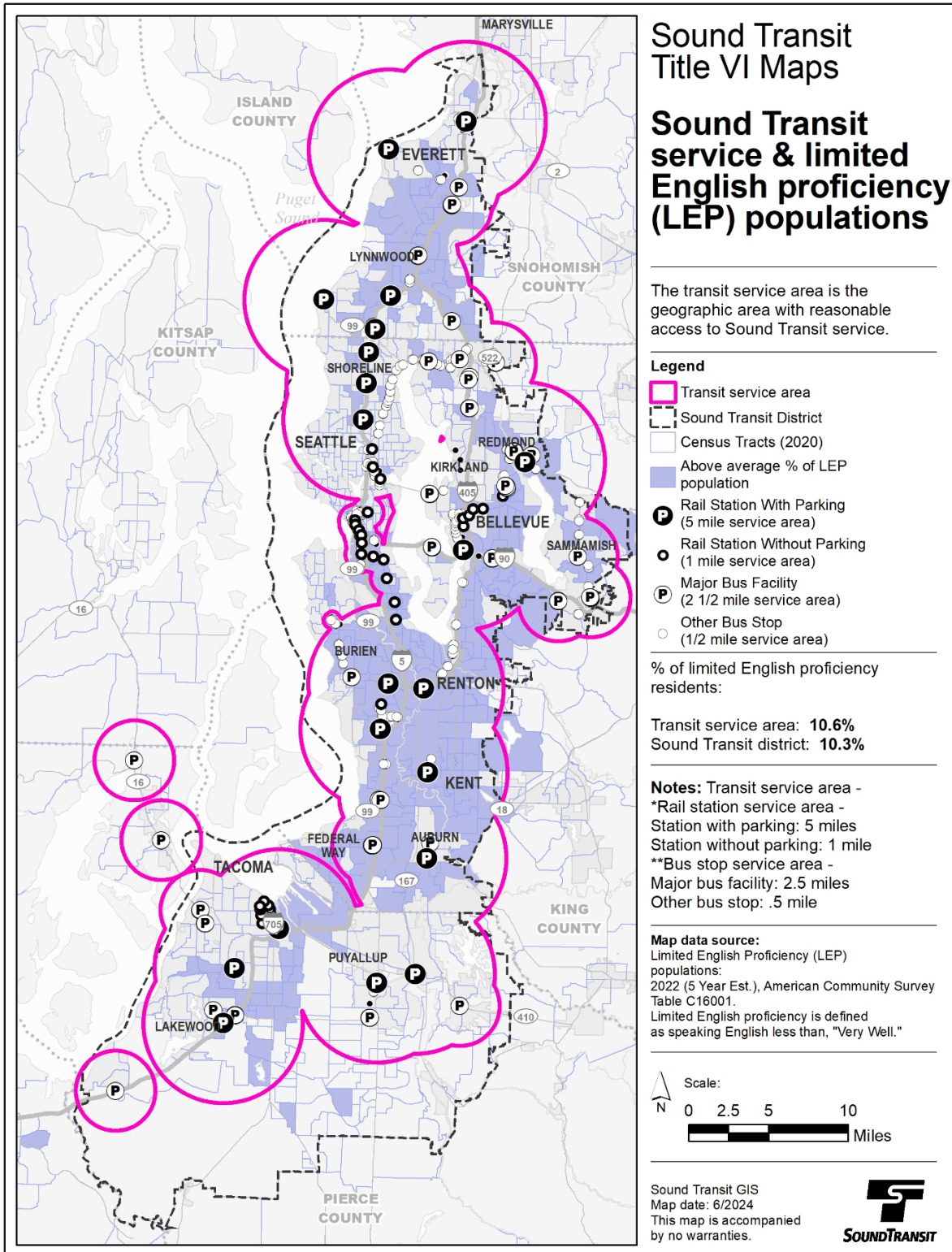


Figure 5: Map of Title VI limited English proficiency (LEP) population for Sound Transit service area



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 Transit Service Area Title VI routes and population data are available in the appendix (Table 8).

Table 4: Title VI-Protected Population by Route

Route	Minority Population	Low-Income Population	Limited English Proficiency (LEP)
ST Express Bus			
510	38.5%	23.1%	11.2%
511	35.6%	18.2%	9.8%
512	35.9%	20.1%	10.5%
513	39.5%	13.8%	10.9%
515	40.6%	14.9%	9.9%
522	29.9%	14.3%	7.5%
532	40.7%	20.0%	12.9%
535	38.3%	15.3%	11.1%
542	47.5%	15.1%	12.3%
545	47.0%	15.2%	11.4%
550	48.6%	17.3%	12.0%
554	47.6%	15.4%	11.4%
556	45.7%	14.2%	11.3%
560	51.7%	22.9%	17.4%
566	57.9%	15.3%	16.4%
574	51.3%	32.0%	14.4%
577	51.3%	26.4%	13.7%
578	42.5%	24.4%	11.3%
580	24.5%	18.7%	4.9%
586	48.2%	32.2%	12.6%
590	43.4%	28.2%	8.1%
592	47.7%	31.0%	9.6%
594	46.3%	31.3%	9.5%
595	34.8%	22.9%	6.0%
596	18.8%	15.4%	3.4%
Commuter Rail			
N Line	34.9%	21.4%	10.6%
S Line	45.4%	25.2%	12.2%
Light Rail			
1 Line	41.7%	20.5%	11.1%
2 Line South Bellevue – Downtown Redmond	45.3%	12.0%	11.7%
Street Car			
T Line	40.2%	26.4%	8.4%
District Average	40.5%	19.8%	10.3%

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 deliver the East Link project. Since 2006 when the East Link Extension 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.

Table 5: Outreach Approach

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.

Project Phase	Engagement Objective
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

Through the 2024 and 2025 Annual Service Plan processes, Sound Transit planned various outreach, communications, and engagement tactics to inform riders about the proposed opening of the DRLE. These annual outreach processes are described below.

2024 Service Plan

The 2024 Service Plan included key messages about the estimated construction timeline of the full 2 Line, including the future expected opening of the Downtown Redmond Link Extension. The 2024 Service Plan was presented to the public on the Annual Service Plan website and translated into Spanish, Chinese (Traditional), and Chinese (Simplified).

The Engagement Team invited the public to comment on the 2 Line and DRLE, receiving 186 comments from East Side participants. Nearly all comments mentioning the 2 Line were positive, with nine directly expressing support or enthusiasm for expanding the 2 Line to Downtown Redmond.

The Public Information Officer published a press release when the ST Express survey went public. Riders subscribed to SMS/Email Rider Alerts for the affected routes received two Rider Alerts inviting them to learn about the 2024 Service Plan and share their feedback on the 2 Line and DRLE.

The System Engagement Team held two Virtual Information Sessions for the public to share feedback and ask questions directly to the Service Plan project team. The System Engagement

Team dispatched Sound Transit Ambassadors to Bellevue Transit Center and two bus stop locations near the future Redmond Technology Station to collect public comments about the 2 Line and DRLE. The Social Media Team also placed geo-targeted paid ads on Facebook in English, Spanish, and Simplified Chinese. The paid ads asked riders to share their feedback with the Service Planning team online and invited them to the Virtual Information Sessions.

2025 Service Plan

The 2025 Service Plan also included the expected opening of the DRLE as a key topic for the East Subarea. The System Engagement Team hosted the 2025 Service Plan on the Annual Service Plan website. The project team translated the website text into six languages: Spanish, Vietnamese, Tagalog, Russian, Chinese (Traditional), and Chinese (Simplified). The purpose of the engagement was to inform riders of the opening timeline of the DRLE; those with comments were invited to share them by emailing servicechanges@soundtransit.org. The project team received no emailed comments regarding the DRLE.

The Public Information Officer published a press release when the ST Express survey went public. Riders subscribed to SMS/Email Rider Alerts for the affected routes received two Rider Alerts inviting them to learn about the 2025 Service Plan.

The Engagement team provided community-based organizations (CBOs) with a toolkit containing key project messages, sample newsletter and social media content, and a flyer for distribution at community events. CBOs included MoveRedmond, TransManage, the City of Bellevue, and the City of Redmond. The System Engagement Team published an article in the August edition of the TransManage newsletter. The Capital Projects Engagement team staffed several events in Redmond, sharing information about DRLE and its inclusion in the 2025 Service Plan.

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 DRLE. The 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 6: Service change analysis summary

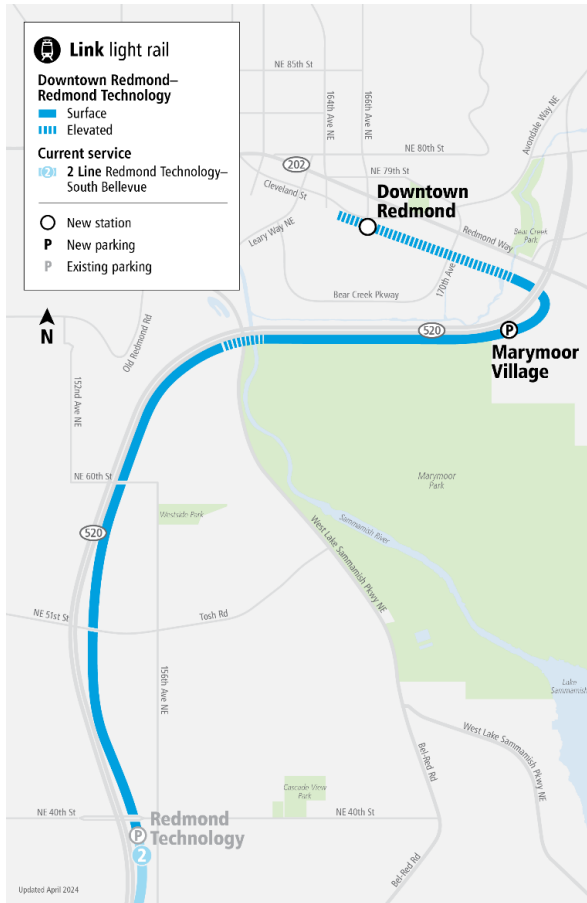
Route	Proposed Change	Type of Change	Adverse Effect	Disparate Impact	Disproportionate Burden
DRLE	Open the DRLE, which includes two new light rail stations.	Major	No	No	No

Downtown Redmond Linke Extension (Line 2)

Service Change Proposal

The DRLE is a new light rail line operating between Redmond Technology Station and Downtown Redmond. It is trending toward a spring 2025 opening date with two new Link light rail stations (Figure 9).

Figure 6: DRLE Alignment and Stations



The DRLE provides connections between the Redmond Technology station and the Downtown Redmond station, opening two new stations. It marks further progress on the opening of the full East Link Extension. The DRLE 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 is 2025. The full extension will provide a connection to the 1 Line. The opening of the DRLE 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 DRLE 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 7: Approximate frequencies

Service Period	Proposed DRLE (2 Line)
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 DRLE service area (45.3%), less than 5% greater than in the ST District as a whole (40.5%) (Table 8), will not be adversely affected by any reduction of service. Therefore, the DRLE does not have a disparate impact. The low-income population, smaller in the DRLE service area (12.0%) than the ST District average (19.8%), 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 DRLE service area (11.7%) than the ST District average (10.3%).

Table 8: Title VI Populations in the ST District and the DRLE Service Area

	Minority Population	Low-Income Population	Limited English Proficiency (LEP) Population
ST District	40.5%	19.8%	10.3%
DLRE service area	45.3%	12.0%	11.7%

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 Figure 10 through Figure 12 in the Appendix for maps of protected populations in the DRLE service area.

Mitigations

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

Public Input

The 2024 and 2025 Service Plans both included the Downtown Redmond Link Extension in their messaging and engagement.

The 2024 Service Plan included key messages about the estimated construction timeline of the full 2 Line, including the future expected opening of the Downtown Redmond Link Extension. The 2024 Service Plan was presented to the public on the Annual Service Plan website and translated into Spanish, Chinese (Traditional), and Chinese (Simplified). The Engagement team invited the public to comment on the 2 Line and DRLE, receiving 186 comments from East Side participants. Nearly all comments mentioning the 2 Line were positive, with nine directly expressing support or enthusiasm for expanding the 2 Line to Downtown Redmond.

The 2025 Service Plan also included the expected opening of the DRLE as a key topic for the East Subarea. The engagement team hosted the 2025 Service Plan on the Annual Service Plan website. The project team translated the website text into six languages: Spanish, Vietnamese, Tagalog, Russian, Chinese (Traditional), and Chinese (Simplified). The purpose of the engagement was to inform riders of the opening timeline of the DRLE; those with comments were invited to share them by emailing servicechanges@soundtransit.org. The project team received no emailed comments regarding the DRLE. The Public Information Officer published a press release when the ST Express survey went public. Riders subscribed to SMS/Email Rider Alerts for the affected routes received two Rider Alerts inviting them to learn about the 2025 Service Plan.

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 2022 to September 2025. 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 2022 and September 2025 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 September 2022 (Fall 2022 service change). For reference, Table 8 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 September 2022 through September 2025. The recovery was interrupted by ongoing operator shortages; however, modest growth in revenue service hours can still be seen.

Table 8: Service Changes, 2022 - 2025

Route	Sept. 2022	Mar. 2023	Sept. 2023	Mar. 2024	Sept. 2024	Mar. 2025	Sept. 2025	Difference between Sept. 2022 & Sept. 2025	Percent Difference between Sept. 2022 & Sept. 2025	Addition or Reduction
1 Line	2,128	2,190	2,190	2,224	2,915	2,915	2,915	787	73%	Addition
2 Line	0	0	0	817	817	942	2,818	2,818	N/A	New Service
510	171	172	172	198	175	175	175	4	2%	Addition
511	95	0	0	0	0	0	0	-95	-100%	Reduction
512	898	922	922	939	733	733	733	-165	-18%	Reduction
513	116	96	96	104	80	80	80	-36	-31%	Reduction
515	0	0	0	0	210	210	210	210	N/A	New Service
522	978	974	975	1,019	1,019	1,019	1,019	41	4%	Addition
532	129	125	125	142	142	142	142	13	10%	Addition
535	406	398	398	431	431	431	431	25	6%	Addition
542	415	427	427	427	427	427	427	12	3%	Addition

Route	Sept. 2022	Mar. 2023	Sept. 2023	Mar. 2024	Sept. 2024	Mar. 2025	Sept. 2025	Difference between Sept. 2022 & Sept. 2025	Percent Difference between Sept. 2022 & Sept. 2025	Addition or Reduction
545	1,080	1,077	1,077	1,071	1,071	1,071	1,071	-9	-1%	Reduction
550	885	883	883	903	903	903	903	18	2%	Addition
554	664	664	664	663	663	663	663	-1	0%	Reduction
556	108	108	108	105	105	105	105	-3	-3%	Reduction
560	697	673	673	623	623	623	623	-74	-11%	Reduction
566	194	196	196	200	200	200	200	6	3%	Addition
574	772	772	772	813	813	813	813	41	5%	Addition
577	287	274	274	209	209	209	209	-78	-27%	Reduction
578	706	708	708	704	704	704	704	-2	0%	Reduction
580	13	13	13	0	0	0	0	-13	-100%	Reduction
586	120	126	126	111	111	111	111	-9	-7%	Reduction
590	329	329	329	176	176	176	176	-153	-47%	Reduction
592	171	171	171	179	179	179	179	8	4%	Addition
594	862	861	861	781	781	781	781	-81	-9%	Reduction
595	61	61	61	67	67	67	67	6	10%	Addition
596	42	42	42	36	36	36	36	-6	-14%	Reduction
N Line	26	26	26	26	53	53	53	27	104%	Addition
S Line	183	183	183	183	183	183	183	0	0%	No Change
T Line	191	191	480	480	480	480	480	289	151%	Addition

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 9 shows the total change in weekly revenue hours between September 2022 and September 2025 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 9: Populations Affected by Service Reduction September 2022 to September 2025

Route	Change in Weekly Revenue Hours	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
511	-95	418,642	148,928	269,714	76,009	342,633
512	-165	559,253	200,511	358,742	112,500	446,753
513	-36	503,500	198,883	304,617	69,483	434,017
545	-9	261,666	123,056	138,610	39,672	221,994
554	-1	233,043	110,829	122,214	36,005	197,038
556	-3	224,636	102,657	121,979	31,840	192,796
560	-74	117,314	60,625	56,689	26,888	90,426
577	-78	162,255	83,177	79,078	42,892	119,363
578	-2	278,113	118,311	159,802	67,934	210,179
580	-13	85,599	20,955	64,644	15,989	69,610
586	-9	191,826	92,423	99,403	61,712	130,114
590	-153	157,493	68,427	89,066	44,355	113,138
594	-81	241,498	111,865	129,633	75,550	165,948
596	-6	66,014	12,402	53,612	10,140	55,874

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: 34.3%
- Non-Minority population adversely affected: 35.6%
- Low-Income population adversely affected: 34.2%
- Non-Low-Income population adversely affected: 35.2%

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 10). **Because the result of -3.8% is not 20 percent or greater, no disparate impact was identified.**

Table 10: Service Reduction Disparate Impact Test

Minority Population Adversely Affected	Non-Minority Population Adversely Affected	Ratio Comparison	Threshold for Disparate Impact	Result
34.3%	35.6%	$34.3\% \div 35.6\% = -3.8\%^1$	20% or greater	No disparate impact

¹In 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 11). **Because the result of -2.8% is not 20 percent or greater, no disproportionate burden was identified.**

Table 11: Service Reduction Disproportionate Burden Test

Low-Income Population Adversely Affected	Non- Low-Income Population Adversely Affected	Ratio Comparison	Threshold for Disproportionate Burden	Result
34.2%	35.2%	$34.2\% \div 35.2\% = -2.8\%^1$	20% or greater	No disproportionate burden

¹In 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 12 shows the total change in weekly revenue hours between September 2022 and September 2025 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 12: Populations Benefited by Service Additions, September 2022 to September 2025

Route	Change in Weekly Revenue Hours	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
1 Line	787	1,298,120	541,936	756,184	265,916	1,032,204
2 Line	2,818	433,574	196,498	237,076	52,064	381,510
510	4	336,164	129,388	206,776	77,697	258,467
515	210	333,580	135,433	198,147	49,703	283,877

Route	Change in Weekly Revenue Hours	Total Population	Minority Population	Non-Minority Population	Low-Income Population	Non-Low-Income
522	41	156,884	46,929	109,955	22,469	134,415
532	13	357,364	145,457	211,907	71,346	286,018
535	25	248,157	95,048	153,109	37,907	210,250
542	12	199,881	94,935	104,946	30,246	169,635
550	18	138,249	67,206	71,043	23,856	114,393
566	6	327,710	189,744	137,966	50,140	277,570
574	41	311,248	159,568	151,680	99,582	211,666
N Line	27	396,128	138,230	257,898	84,872	311,256
T Line	289	267,573	107,591	159,982	70,561	197,012

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: 52.6%
- Non-Minority population benefiting: 52.7%
- Low-Income population benefiting: 50.9%
- Non-Low-Income population benefiting: 53.1%

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 13).

Because the result of 99.8 percent is greater than the 80 percent or less threshold, no disparate impact/disparate impact was identified.

Table 13: Service Additions Disparate Impact Test

Minority Population Benefiting	Non-Minority Population Benefiting	Ratio Comparison	Threshold for Disparate Impact	Result
52.6%	52.7%	52.6% ÷ 52.7% = 99.8%	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 14). **Because the result of 95.7 percent is greater than the 80 percent or less threshold, no disproportionate burden was identified.**

Table 14: Service Additions Disproportionate Burden Test

Low-Income Population Benefiting	Non- Low-Income Population Benefiting	Ratio Comparison	Threshold for Disproportionate Burden	Result
50.9%	53.1%	$50.9\% \div 53.1\% = 95.7\%$	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 percent for protected populations. For service reductions, the adverse impacts to protected populations do not exceed 20 percent for protected populations. Therefore, the systemwide analysis did not identify any adverse effects on protected populations during the period of analysis.

Conclusion

This report documents the Title VI Service and Fare Equity Analysis required for the Downtown Redmond Link Extension. 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 DRLE 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 15: ST Service Area Title VI Routes and Populations¹

Route	Total Population	Minority Population		Non-Minority Population	Limited English Proficiency (LEP) ²		Low-Income Population ³		Non-Low Income
1 Line	1,298,120	541,936	41.7%	756,184	144,139	11.1%	265,916	20.5%	1,032,204
2 Line	433,574	196,498	45.3%	237,075	50,635	11.7%	52,064	12.0%	381,509
510	336,164	129,388	38.5%	206,776	37,694	11.2%	77,697	23.1%	258,467
511	418,642	148,928	35.6%	269,714	41,006	9.8%	76,009	18.2%	342,633
512	559,253	200,511	35.9%	358,742	58,906	10.5%	112,500	20.1%	446,753
513	503,500	198,883	39.5%	304,617	54,882	10.9%	69,483	13.8%	434,017
515	333,580	135,433	40.6%	198,147	33,024	9.9%	49,703	14.9%	283,877
522	156,884	46,929	29.9%	109,955	11,710	7.5%	22,469	14.3%	134,415
532	357,364	145,457	40.7%	211,907	46,024	12.9%	71,346	20.0%	286,018
535	248,157	95,048	38.3%	153,109	27,589	11.1%	37,907	15.3%	210,250
542	199,881	94,935	47.5%	104,946	24,568	12.3%	30,246	15.1%	169,635
545	261,666	123,056	47.0%	138,610	29,893	11.4%	39,672	15.2%	221,994
550	138,249	67,206	48.6%	71,043	16,538	12.0%	23,856	17.3%	114,393
554	233,043	110,829	47.6%	122,214	26,680	11.4%	36,005	15.4%	197,038
556	224,636	102,657	45.7%	121,979	25,303	11.3%	31,840	14.2%	192,796
560	117,314	60,624	51.7%	56,689	20,446	17.4%	26,888	22.9%	90,425
566	327,710	189,744	57.9%	137,966	53,744	16.4%	50,140	15.3%	277,570
574	311,248	159,568	51.3%	151,680	44,813	14.4%	99,582	32.0%	211,666
577	162,255	83,177	51.3%	79,078	22,252	13.7%	42,892	26.4%	119,363
578	278,113	118,311	42.5%	159,802	31,541	11.3%	67,934	24.4%	210,179
580	85,599	20,955	24.5%	64,643	4,157	4.9%	15,989	18.7%	69,609
586	191,826	92,423	48.2%	99,403	24,217	12.6%	61,712	32.2%	130,114
590	157,493	68,427	43.4%	89,065	12,802	8.1%	44,354	28.2%	113,138
592	179,701	85,665	47.7%	94,036	17,192	9.6%	55,644	31.0%	124,057
594	241,498	111,865	46.3%	129,633	23,029	9.5%	75,550	31.3%	165,948
595	278,780	96,889	34.8%	181,891	16,725	6.0%	63,738	22.9%	215,042
596	66,014	12,402	18.8%	53,612	2,272	3.4%	10,140	15.4%	55,874
N Line	396,128	138,230	34.9%	257,898	42,183	10.6%	84,872	21.4%	311,256
S Line	1,228,331	557,262	45.4%	671,069	150,153	12.2%	309,216	25.2%	919,115
T Line	267,573	107,591	40.2%	159,982	22,524	8.4%	70,561	26.4%	197,012
District Average			40.5%			10.3%		19.8%	

¹ Statistics reflect service area after the service change.

² Limited English is defined as speaking English, "Less than very well."

³ Low-Income is defined as a 200% poverty level and below.

Route-Level Title VI Population Maps

Figure 7: DLRE stations and minority populations

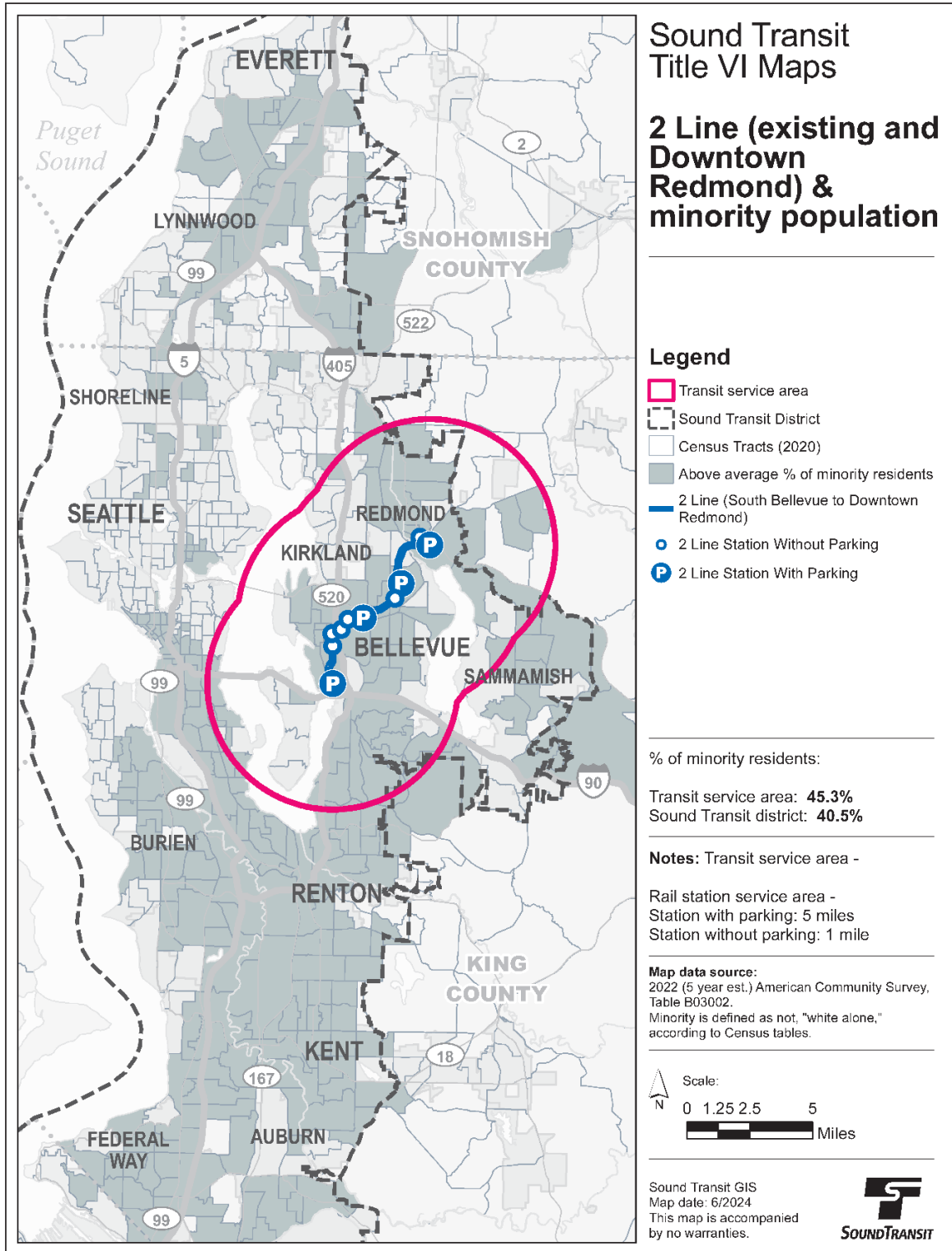


Figure 8: DLRE stations and low-income populations

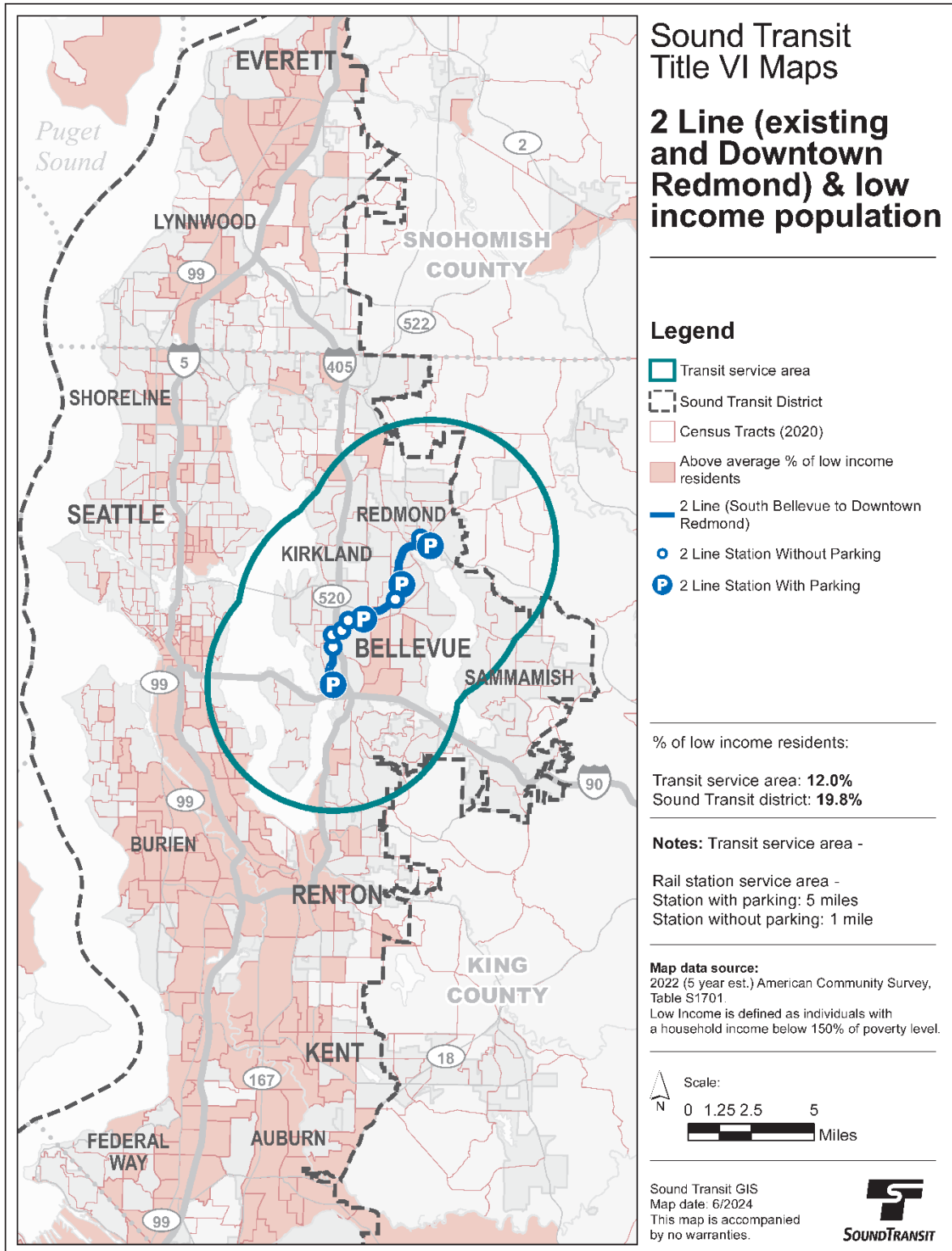
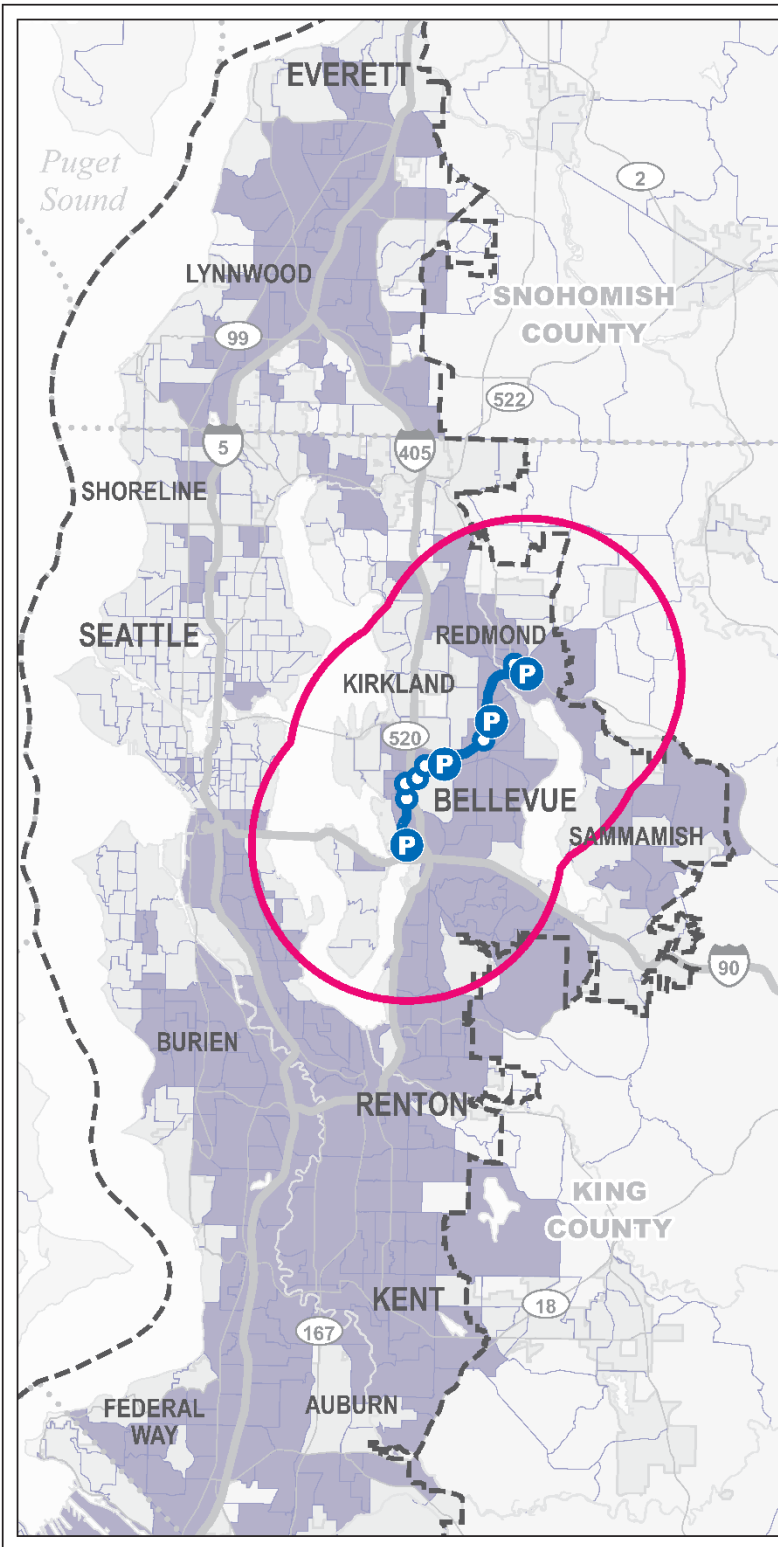


Figure 9: DLRE stations and limited English proficiency (LEP) populations



Sound Transit Title VI Maps

2 Line (existing and Downtown Redmond) & limited English proficiency (LEP) populations

Legend

- Transit service area
- Sound Transit District
- Census Tracts (2020)
- Above average % of LEP population
- 2 Line (South Bellevue to Downtown Redmond)
- 2 Line Station Without Parking
- P 2 Line Station With Parking

% of limited English proficiency residents:

Transit service area: 11.7%
Sound Transit district: 10.3%

Notes: Transit service area -

Rail station service area -
Station with parking: 5 miles
Station without parking: 1 mile

Map data source:
Limited English Proficiency (LEP) populations: 2022 (5 Year Est.), American Community Survey Table C16001. Limited English proficiency is defined as speaking English less than, "Very Well."



Sound Transit GIS
Map date: 6/2024
This map is accompanied by no warranties.

