



# **2019 King County Metro Transit Title VI Program Report**

2017-2019 Report to the Federal Transit Administration  
in Accordance with FTA Circular 4702.1B, *Title VI Program Guidelines for  
Federal Transit Administration Recipients*

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**Alternative Formats Available**

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## Introduction

King County Metro Transit (Metro) prepared this report on our Title VI program to comply with requirements of the Federal Transit Administration (FTA). The FTA requires that transit agencies receiving federal funds submit a Title VI program report every three years. This report covers July 2016 through June 2019. The dates have been aligned with the process for expected King County Council review and approval to ensure this report is submitted to the FTA by the October 1 deadline.

The FTA's authority to require this program stems from the Civil Rights Act of 1964 and subsequent regulations. As stated in circular FTA C 4702.1B, which provides guidance and instructions for complying with Title VI regulations, the purposes of the Title VI program are:

- a. Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- b. Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- c. Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Circular FTA C 4702.1B includes a checklist of items that are to be included in the Title VI program. In general, this report is organized in the order of that checklist.

### King County Metro Transit Department

King County Metro Transit is part of King County, Washington. Metro is the largest public transportation agency in the Puget Sound region. We deliver more than 130 million rides per year through a variety of mobility options, including:

- **Fixed-route services**, including bus, rail (operated under contract to Sound Transit), streetcar (operated under contract to the City of Seattle), and water taxi.
- **Contracted services** that are provided by contractor agencies on Metro's behalf, such as Dial-A-Ride-Transit and Access paratransit.
- **Shared and connected services**, such as vanpool, vanshare, rideshare, community-based shuttles, and first-mile/last-mile services.

As of January 1, 2019, Metro became a stand-alone department within King County government (Ordinance 18777). Prior to that time, Metro was a division of the County's Department of Transportation.

As part of its transition from a division to a department, Metro reasserted its commitment to equity in mobility through its business plan. Metro is committed to reducing historic disparities and addressing transportation barriers as described in King County's Equity and Social Justice Strategic Plan, which is discussed below. This includes but is not limited to planning, developing, and delivering mobility solutions that provide access to opportunities for people with low or no incomes, people of color, seniors, people with limited English proficiency, immigrants and refugees, people with disabilities, and those who commute during non-peak travel periods or who live or work in rural areas.

## **King County Population Growth and Demographics**

King County has grown rapidly for much of the last decade. Since 2010, the county's population has increased from 1,931,249 people (as of the 2010 Census) to 2,233,163 people (as of the 2018 American Community Survey estimate).

The makeup of the population has also changed. King County has become increasingly racially and ethnically diverse, although much of the diversity is concentrated in particular areas within the county.

The percentage of white residents in King County decreased between 2000 and 2018. During this period, nearly every minority category saw gains, particularly Asian and Hispanic populations. Asian residents accounted for approximately 17 percent of the population of King County in 2018, up from 10.8 percent in 2000. The Hispanic population grew to nine percent of the King County population in 2018, up from 5.5 percent in 2000.

In addition, a steadily increasing proportion of King County residents are foreign-born. In fact, much of the county's overall population increase in recent years can be attributed to foreign-born residents. In 2000, 15.4 percent of King County residents were born in another country. As of 2017, this had grown to 23.6 percent. More than half the foreign-born residents of King County originate from Asia and one-fifth from the Americas. In King County, the most common countries of origin are China including Taiwan and Hong Kong (71,342 residents, as of 2017), India (62,021), and Mexico (57,840).

This increasing diversity in race and ethnicity, the increasing number of foreign-born residents, some of whom may have limited English proficiency, as well as King County's commitment to the overall health and strength of the region, has led King County to develop and implement a number of policies and programs based on ensuring equity and social justice for all residents of the county.

## **Equity and Social Justice in Plans and Policies**

Metro and its parent government body, King County, have a deep and long-standing commitment to the principles embodied in Title VI of the Civil Rights Act of 1964. This commitment has been affirmed and expanded in County plans and policies adopted in recent years. As set out in the foundational documents described below, Metro is committed not only to nondiscrimination but also to actively promoting equity and social justice in the services we provide.

### **Equity and Social Justice Ordinance**

King County's Equity and Social Justice Ordinance (Ordinance 16948) requires that county programs and services promote equity and social justice. The ordinance calls for county agencies to examine the causes of racial disparities and inequities and to create conditions for all individuals and communities to reach their full potential. Research has shown that where people live, the color of their skin, and how much money they have can affect their access to opportunities, including but not limited to education, health care, economic and other opportunities. The lack of these opportunities in turn has an impact on health, quality of life and even life expectancy.

King County's Office of Equity and Social Justice is leading ongoing work to highlight the roots of inequities and move toward solutions, and has developed King County's Equity and Social Justice Strategic Plan, 2016-2022, which is a blueprint for action and change that will guide King County's pro-equity policy direction, decision-making, planning, operations and services, and workplace practices in order to advance equity and social justice within King County's government and its partnership with communities. Metro plays a key role in promoting equity and social justice as the primary provider of public transportation services countywide. More information is available at <http://www.kingcounty.gov/elected/executive/equity-social-justice.aspx>.

In addition to the Equity and Social Justice Strategic Plan, key policies and ongoing efforts to advance equity and social justice include the King County Strategic Plan; King County Comprehensive Plan; King County Metro Strategic Plan and Service Guidelines; Executive Order on Written Translation Services; King County’s language assistance plan requirements; and Metro’s Partnership to Achieve Comprehensive Equity (PACE), as well as other Metro-specific efforts.

### **King County Equity and Social Justice Strategic Plan, 2016-2022**

The King County Equity and Social Justice (ESJ) Strategic Plan envisions a county where all people have equitable opportunities to thrive. It is based around four strategies: invest upstream and where needs are greatest; invest in community partnerships; invest in employees; and invest with accountable and transparent leadership. The plan provides direction for how King County will use these four strategies within the areas of leadership, operations and services; plans, policies and budgets; workplace and workforce; community partnerships; communication and education; and facility and system improvements. The plan’s goal areas are aligned with King County’s biennial budget process and aim to build the county’s capacity to advance equity and social justice using the concept of adaptive management.

The ESJ Strategic Plan includes a section that outlines a pro-equity policy agenda for Transportation & Mobility based on four approaches:

1. Ensure that we get the most service out of every dollar and that the system responds to the transportation needs of the community.
2. Build an intentional equity focus into the delivery of transportation services.
3. Develop alternative services to respond to the specific needs of those who live in communities that do not support traditional service (e.g., rural communities).
4. Create broader and more meaningful access to transportation through improved engagement with communities and provide translations into many languages, as we prepare to offer service that connects more neighborhoods with high capacity transit.

More information is available at <https://kingcounty.gov/elected/executive/equity-social-justice/strategic-plan.aspx>.

### **King County Strategic Plan**

The King County Strategic Plan establishes “equitable and fair” as a guiding principle that is intended to address the root causes of inequities to provide equal access to opportunities for all. This principle is reflected in the draft mobility goal to: “Deliver a safe, reliable, and seamless network of transportation options to get people and goods where they need to go, when they need to get there.” Draft mobility objectives are:

- Increase integration between transportation modes and all service providers.
- Preserve and optimize the mobility system.
- Ensure the safety and security for customers and employees using the mobility network.
- Provide more equitable mobility access and reduce historic gaps.

More information is available at <https://www.kingcounty.gov/depts/executive/performance-strategy-budget/performance-strategy/Strategic-Planning/2015-strategic-plan-update.aspx>.

### **King County Comprehensive Plan**

Another policy document Metro relies on for guidance is the King County Comprehensive Plan, which provides policy direction on growth management and land use, as well as regional services including transit. The 2016 Comprehensive Plan, which was amended in 2017 and 2018, includes policies on public

participation in planning, stating that, “King County shall actively solicit public participation from a wide variety of sources in its planning processes” (Policies RP-101, 102, 103). The plan also includes a section on addressing health, equity, and social and environmental justice.

The transportation chapter of the plan states that King County should “seek to ensure that its system of transportation services and facilities serves the mobility needs of disadvantaged communities and people with limited transportation options, including people of color, low income communities, people with limited English proficiency, immigrant and refugee populations, students, youth, seniors, and people with disabilities.” (Policy T-101a) More information is available at [https://www.kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/Comp%20Plan/2018\\_Update\\_to\\_King\\_County\\_Comprehensive\\_Plan.ashx?la=en](https://www.kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/Comp%20Plan/2018_Update_to_King_County_Comprehensive_Plan.ashx?la=en).

### **Executive Order on Written Translation Process**

King County is dedicated to providing all residents fair and equal access to services, opportunities and protection. Noting that a substantial number of people in King County have limited English proficiency, King County Executive Dow Constantine issued an executive order on translation of public communication materials in October 2010. This executive order requires County agencies, including Metro, to translate public communication materials and vital documents into Spanish as soon as feasible within available resources, and into other commonly spoken non-English languages according to a tier map of languages that is updated regularly and is based on five different data sources of the languages spoken by limited-English-proficient people in the county.<sup>1</sup> The executive order provides for the use of alternative forms of language assistance, such as interpretation services, when they are more effective or practical. More information is available at <http://www.kingcounty.gov/exec/styleguide/translation.aspx>.

### **King County requirement for Language Assistance Plans**

In 2018, the King County Council added a new section to the King County Code (K.C.C. 2.15.030, added by Ordinance 18665), which requires King County and all its contractors to provide free and prompt interpretation and translation services to limited-English-proficient persons. The new section of the Code also requires King County agencies and offices to develop language assistance plans<sup>2</sup> that identify which vital documents and public communication materials are to be translated for use by limited-English-proficient persons. The language assistance plans also include identification of agency or office provisions for translation of web pages, automated telephonic greetings, automated telephonic voice messages, and informational signage. The threshold for the translation of vital documents and public communication materials is based on the top six languages identified by the tier map of languages maintained by the King County Executive’s Office.

### **Strategic Plan for Public Transportation and Metro Service Guidelines**

Metro’s Strategic Plan incorporates equity and social justice by echoing the goals and principles of the King County Strategic Plan and by including more specific strategies related to transit and transportation services. The *Strategic Plan for Public Transportation 2011-2021*, which includes Metro’s Service Guidelines, was adopted by the King County Council in July 2011 and updated in 2016 (Ordinance 18301). The Strategic Plan and Service Guidelines are available at <http://metro.kingcounty.gov/planning/strategic-plan/>. The Service Guidelines are also included in Appendix E.

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<sup>1</sup> The tier map of languages is described in more detail in Appendix C.

<sup>2</sup> The King County Code definition of a language assistance plan is different from that defined by Title VI. The Title VI requirements are used for the Language Assistance Plan that is described later in this report and that can be found in Appendix C.

Metro’s Strategic Plan includes the following goals and strategies that promote nondiscrimination and full and fair access to services and participation in decision-making processes:

Goal 2: Human Potential. Provide equitable opportunities for people from all areas of King County to access the public transportation system.

Objective 2.1: Provide public transportation products and services that add value throughout King County and that facilitate access to jobs, education, and other destinations.

Strategy 2.1.1: Design and offer a variety of public transportation products and services appropriate to different markets and mobility needs.

Strategy 2.1.2: Provide travel opportunities and supporting amenities for historically disadvantaged populations, such as low-income people, students, youth, seniors, people of color, people with disabilities, and others with limited transportation options.

Strategy 2.1.3: Provide products and services that are designed to provide geographic value in all parts of King County.

Strategy 2.1.4: In areas that are not well-served by fixed-route service or where geographic coverage service gaps exist, seek to complement or “right-size” transportation service by working with partners to develop an extensive range of alternative services to serve the general public.

Goal 7: Public Engagement and Transparency. Promote robust public engagement that informs, involves, and empowers people and communities.

Objective 7.1: Empower people to play an active role in shaping Metro’s products and services.

Strategy 7.1.1: Engage the public in the planning process and improve customer outreach.

Objective 7.2: Increase customer and public access to understandable, accurate and transparent information.

Strategy 7.2.1: Communicate service change concepts, the decision-making process, and public transportation information in language that is accessible and easy to understand.

Goal 8: Quality Workforce. Develop and empower Metro’s most valuable asset, its employees.

Objective 8.1: Attract and recruit quality employees.

Strategy 8.1.2: Promote equity, social justice and transparency in hiring and recruiting activities.

### ***Service Guidelines***

Metro’s strategic plan also incorporates Service Guidelines that include social equity as one of three priorities that Metro considers in the service planning process.

These guidelines define a process by which Metro annually reviews and establishes target service levels for transit corridors. The process assigns scores that are based on indicators of productivity, social equity, and geographic value. The social equity score, which represents 25 percent of the total score, is based on the percentage of people boarding in a census tract that has a low-income or minority population higher than the countywide average. The total score, which also includes scores for productivity and geographic value, establishes a preliminary target service level for each corridor. The preliminary target service level may be adjusted upward to accommodate current ridership. A corridor that is below its final target service level is identified as a service investment priority. The overall result is that, other factors being equal,

investments in routes that serve low-income or minority populations will be prioritized over routes that do not serve low-income or minority populations.

Metro reviews its efforts towards implementing its strategic plan in periodic progress reports. It does the same for its Service Guidelines in an annual report. In addition to monitoring and measuring progress towards implementation, these reports provide an opportunity to update and improve Metro's commitments towards these goals and policies, such as the 2016 revision to the Service Guidelines to strengthen consideration of social equity in the annual analysis.

## **METRO CONNECTS**

Metro's long-range plan, METRO CONNECTS, was adopted in January 2017 (Ordinance 18449). METRO CONNECTS defines an aspirational vision for a 70 percent increase in bus service hours by 2040 and the supporting capital infrastructure needed to accommodate regionally forecasted growth.

The plan includes a target for higher access (1/2 mile) to frequent transit service for people of color and low-income people than the population as a whole. It describes how Metro incorporates social equity principles into the planning and design of accessible and fixed-route services, passenger facilities, and technology, noting that concentration of households of color and low-income households was included as a prioritization criteria for the selection of RapidRide (bus rapid transit) lines. Specifically, METRO CONNECTS envisions a transit system in which, by 2040, 77 percent of people of color and 87 percent of low-income people within King County live near frequent transit service. METRO CONNECTS is available at: <http://www.kcmetrovision.org/>.

## **Recent Notable Achievements**

Metro actively follows the guidance and requirements of King County's plans and policies described above, as well as the Title VI statute and regulations. The following represent a few major notable programs Metro has implemented over the past few years to promote fair and equal access to Metro's services and activities for all people in our service area, including minority populations and people who have limited English proficiency or low incomes:

- *Service increases.* The service changes documented in this program report represent an overall increase in transit service in the region, including an investment of more than 100,000 hours in Priority 3 needs identified by Metro's adopted Service Guidelines. (Priority 3 investments are those made to strengthen Metro's All-Day and Peak-Only Network in corridors connecting centers). These service additions include substantial investments to bring new, frequent service to several key routes serving South King County, which has higher concentrations of low-income, minority, and LEP populations. In addition, Metro was able to work with the City of Seattle to direct Seattle voter-approved transit funding to support several routes in South Seattle (an area of Seattle with higher concentrations of low-income, minority, and LEP populations) and several routes that also serve areas just outside Seattle with higher concentrations of priority populations.
- *ORCA LIFT reduced fare program.* ORCA LIFT provides a flat \$1.50 fare for riders with household income below 200 percent of the federal poverty level. ORCA LIFT was created in response to a desire to make transit more affordable and accessible to low-income individuals. A key to this program's success is Metro's partnership with King County's public health department and a broad network of human service agencies.

As of the end of the first quarter of 2019, there were 58,687 valid ORCA LIFT cards. Of ORCA LIFT cards issued during the first quarter of 2019, 22 percent were issued to Black or African American riders (who make up about 6 percent of the overall county population) and 13 percent were issued to people using a language other than English (compared with an estimated 10.7 percent of the county population with limited English proficiency). Top languages were Spanish (4.8 percent), Chinese (1.7 percent), Amharic (0.7 percent) and Tigrinya (0.6 percent). More

information about how to enroll in ORCA LIFT is available at <https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx>. The web site is available in English and Spanish. Metro has prepared printed enrollment materials in 14 languages. These materials are available at the 127 enrollment locations around the county. A 2019 first quarter update on the ORCA LIFT program can be found in Appendix H.

- *Provision of tickets to human services agencies.* Each year, Metro makes available subsidized bus tickets to be purchased by eligible human services agencies and then distributed to the people they serve. Metro subsidizes 90 percent of the cost of the tickets, for a total annual subsidy of \$4 million. Human services agencies apply to participate in the program. During 2019, 168 agencies have been selected to participate and will distribute more than 1.5 million tickets over the course of the year to people in need. A full list of 2019 participating agencies can be found in Appendix G. More information is available at <https://www.kingcounty.gov/depts/community-human-services/housing/services/homeless-housing/bus-ticket-program.aspx>.
- *Fare simplification.* In fall 2017, the King County Council approved a fare simplification ordinance (Ordinance 18608) that set a \$2.75 flat fare for full-fare adult riders during all hours of the day and across all areas of the county, for implementation in July 2018. The goal was to make fares easier to understand and pay, reduce travel time by speeding up boarding, and increase access and affordability for some riders. ORCA LIFT (low-income), youth, senior, and disabled fares remained unchanged. Since the new, simplified fare could affect some riders in a negative way, Metro also increased the subsidy available to human services agencies for ticket purchases from \$3.6 million to \$4 million a year, eliminated the \$3 ORCA card fee for Regional Reduced Fare Permits (available to seniors over age 65 and people with disabilities), and has been working to develop a new income-based fare program, which will be implemented in 2020. More information is available at <https://www.kingcounty.gov/depts/transportation/metro/fares-orca.aspx>.
- *Changes to fare enforcement.* Metro's RapidRide (bus rapid transit) allows off-board fare payment and all-door boarding, and is therefore supported by a fare enforcement program. Fare enforcement officers check a random sample of passengers for payment. In 2016, they checked approximately 1.4 percent of RapidRide ridership. In response to findings from the King County Auditor that fare enforcement was having negative impacts on people in need, particularly people facing housing instability or homelessness, Metro developed a new fare enforcement process, which was adopted by the King County Council in 2018 (Ordinance 18789). The new process replaced citations processed through the criminal justice system with an alternative resolution process that relies on warnings, reduced fees, and multiple ways to address infractions, including enrolling in ORCA LIFT (low-income fare program) or performing community service.
- *Continued language outreach efforts.* Metro continues to expand translation of informational documents for riders, with a focus on the languages used by the largest groups in King County. Through the King County Mobility Coalition, Metro also provides a series of videos for refugee and immigrant populations, in their native languages, about how to use transit and alternative services. The videos are available in 13 languages. Working with the Mobility Coalition, Metro has also developed a King County Accessible Travel Map as a resource for older adults, people with disability, caregivers, and support staff to showcase the transportation options available in King County. The map is available in English and Spanish. More information is available at <http://metro.kingcounty.gov/advisory-groups/mobility-coalition/>.
- *Partnership to Achieve Comprehensive Equity (PACE).* Facing concerns about equity and racial discrimination among employees, Metro, Amalgamated Transit Union Local 587, and Professional and Technical Employees Local 17 launched the Partnership to Achieve Comprehensive Equity (PACE). PACE aims to build and enhance the processes, tools, and standards for embracing diversity and ensuring equal opportunity for all Metro employees. With

full support of King County leadership, the partnership continues to support the building and maintenance of a work culture characterized by inclusion, fairness, and comprehensive equity. While this effort was originally aimed at internal employees rather than customers, it is indicative of the overall commitment of King County and Metro leaders to equity and social justice and is currently geared toward positively impacting both the customer and employee experience. PACE was nationally recognized by the National Public Employer Labor Relations Association (NPERLA) as demonstrating innovative leadership in public sector labor relations.

This report provides more information about these and the many other steps Metro has taken to comply with Title VI requirements and to move toward King County's vision of a fair and equitable King County where all have an opportunity to thrive and reach their full potential.

# SECTION I: General Reporting Requirements

## Title VI Notice to the Public

Metro uses a variety of means to notify the public that we comply with the requirements of Title VI and related statutes and regulations.

Placards displaying this notice, as well as information about how to file a complaint if a person believes Metro has discriminated against them, are posted inside all buses, as well as at Metro's pass sales office. The notice is translated into Cambodian, Chinese, Korean, Russian, Somali, Spanish, Tagalog, Tigrinya, and Vietnamese. The notice in the pass sales office includes all of the languages. For reasons of space, the notices posted within individual bus coaches contain half of the languages, and these placards are displayed on Metro coaches. The wording of the notice follows:

**“King County Metro Transit does not discriminate in the provision of service...**

King County Metro Transit does not discriminate in the provision of service on the basis of race, color, and national origin. For more information on Metro's nondiscrimination obligations, or to file a discrimination complaint, you may call Metro's Customer Information Office at 206-553-3000. You may also contact Metro in writing at the address below.

General Manager, King County Metro Transit  
201 S. Jackson St. KSC-TR-0415, Seattle, WA 98104.”

A similar notice of Title VI obligations and remedies is provided to customers of Metro's Access paratransit service.

Metro has also posted a Title VI notice in English and Spanish on our website (<https://kingcounty.gov/depts/transportation/metro/about/civil-rights.aspx>):

**“Civil Rights – Title VI**

Metro operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable law.

King County is committed to complying with the requirements of Title VI in all of its federally funded programs and activities. To request additional information on King County's Title VI nondiscrimination requirements, call us at 206-263-2446 (TTY 711).”

In addition, the following notification is posted in English and Spanish on the King County website (<https://kingcounty.gov/elected/executive/equity-social-justice/civil-rights/title-six.aspx>):

**“Title VI of the Civil Rights Act of 1964 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.

**King County Title VI Policy Statement**

King County assures that no person shall on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 as amended, and the Civil Right Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

King County further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event King County distributes federal aid funds to another governmental entity or other sub-recipient, King County will include Title VI language in all written agreements and will monitor for compliance.

King County’s Office of the Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and other King County responsibilities as required by 23 CFR 200 and 49 CFR 21.

Dow Constantine  
King County Executive  
May 28, 2010”

## **Title VI Complaint Procedures and Form**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Metro Transit may file a Title VI complaint by completing and submitting the official Title VI Complaint Form provided on Metro’s website or the website of the King County Office of Civil Rights.

To constitute an official Title VI complaint, the complainant must submit a written, signed complaint utilizing the official Title VI form alleging discrimination by an employee of Metro. A Title VI Complaint Form may be submitted by the complainant directly to Metro or to the King County Office of Civil Rights or the FTA.

The King County Civil Rights Program’s online complaint form is available at <https://www.kingcounty.gov/elected/executive/equity-social-justice/civil-rights/civil-rights-complaint-form.aspx>.

In addition, King County Metro has downloadable complaint forms in English and Spanish at its website: <https://kingcounty.gov/depts/transportation/metro/about/civil-rights.aspx>.

A copy of the English version of the complaint form can be found in Appendix A.

When Metro receives a customer complaint (via phone, email, social media, or any other means of communication (including in writing to Metro’s Department Director, 201 S. Jackson St. KSC-TR-0415, Seattle, WA 98104) alleging an act or failure to act that may ultimately be filed as an Official Title VI complaint, the complainant will be informed that:

- a. In order to preserve evidence and swiftly address the issues alleged in the complaint, Metro will immediately begin the process of investigating the complaint under the oversight of Metro’s Office of EEO/Equity & Inclusion; and
- b. Following the investigation, Metro will issue a written response to the complainant summarizing the allegations and stating the findings. As appropriate, the written response may also describe any corrective action taken; and
- c. Regardless of Metro’s findings and any corrective actions taken by Metro, the complainant has 180 days from the date of the incident to file a formal Title VI complaint and that right may only be exercised through completing, signing and submitting an official Title VI Complaint form found on the Metro website (which Metro will also offer to send electronically or via mail); and
- d. If the complainant chooses to exercise the option of filing a formal Title VI complaint, once the official complaint form is completed, signed and received, jurisdiction for investigating the Official Title VI complaint will transfer to the County’s Office of Civil Rights and that program’s procedures will govern.

As a department within a multi-purpose government, as well as a direct recipient and sub-recipient of federal funds, Metro coordinates closely with King County’s Office of Civil Rights, as well as partner agencies, to ensure that our processes for receiving, tracking, and investigating Title VI complaints are aligned and fulfill all Title VI requirements.

## Title VI Investigations, Complaints, and Lawsuits

One civil rights complaint was filed since Metro’s 2016 Title VI program was submitted. That complaint was dismissed. The complaint and actions taken are listed in Table 1.

**Table 1  
King County Office of Civil Rights - Complaints and Actions Taken**

<b>Metro/Public Accommodation Complaints</b>				
	<b>Date filed</b>	<b>Summary/Allegations</b> (include basis of complaint: race, color, or national origin)	<b>Status – April 15, 2019</b>	<b>Action(s) Taken</b>
1. KCPA 16-01-01 Collins v. DOT- Transit Division	11-7-16  Amended 3-3-17	Adverse treatment by driver- Basis: race (African-American) and gender (Female) on two occasions (different drivers)	File closed 7-12-17	No reasonable cause finding 6-12-17

## Public Participation Plan

King County, broadly, and Metro, specifically, have a number of policies and plans that establish expectations for how Metro engages minority and limited-English-proficient (LEP) populations in our public engagement and outreach processes. These policies and plans reflect the principle that all those affected by a decision should be involved in shaping it.

- The **King County Strategic Plan** seeks to ensure that King County government operates efficiently and effectively and is accountable to the public. Specifically, the Strategic Plan commits to “deliver consistent, responsive, equitable, high-quality services to residents, cities, and districts.”
- **Metro’s Strategic Plan for Public Transportation 2011-2021** includes a goal on public engagement and transparency that states: “Promote robust public engagement that informs, involves, and empowers people and communities.” Objectives and strategies within that goal area commit that Metro will:
  - Empower people to play an active role in shaping Metro’s products and services. (Objective 7.1)
  - Engage the public in the planning process and improve customer outreach. (Strategy 7.1.1)
  - Increase customer and public access to understandable, accurate and transparent information. (Objective 7.2)
  - Communicate service change concepts, the decision-making process, and public transportation information in language that is accessible and easy to understand. (Strategy 7.2.1)

Metro’s strategic plan makes a commitment to targeting historically underrepresented populations, and states, “Metro considers equity and social justice in its decision-making process, particularly for people of color, low-income communities, and people with limited English proficiency, and people with other communication barriers consistent with King County’s Equity and Social Justice Ordinance, Executive Order on Translation, and federal law.”

- **King County’s Equity and Social Justice (ESJ) Strategic Plan** makes a number of commitments related to public participation. These include:
  - “Build community capacity as a strategy to foster full and equitable civic participation.” (Community Partnerships goal area, Invest upstream and where needs are greatest strategy area)
  - “Invest in community-based partnerships that will steadily inform the County’s decision-making and foster full and equitable civic participation.” (Theory of Change)
  - “Support increased capacity for engagement and participation of community partners, and target more grassroots agencies, networks and interested consumers in planning and implementation.” (Pro-Equity Policy Agenda, Health & Human Services)
  - “County and department-level policies explicitly include equity and social justice as a principle and have community participation from the start.” (Plans, Policies & Budgets goal area, minimum standards)

As noted above, the Transportation & Mobility section of the ESJ Strategic Plan states that Metro Transit should “create broader and more meaningful access to transportation through improved engagement with communities.” (Pro-Equity Policy Agenda, Transportation & Mobility)

- **The County’s Executive Order on Translation** directs all agencies of the County, including Metro, to ensure that communications are culturally and linguistically appropriate to the target audiences, and provides guidance for translating public communication materials.
- **The King County Code** (K.C.C. 2.15.030) requires all County agencies and offices to develop language assistance plans that identify which vital documents and public communication materials need to be translated into languages for use by LEP persons.

In the context of these policies, Metro’s ongoing and project-based public engagement methods proactively seek to engage minority and LEP populations in conversations that shape decision making.

### **Ongoing Engagement**

**Transit Advisory Commission.** The Transit Advisory Commission (TAC) was established in January 2011 (Ordinance 17025). It was created from the merger of two previous advisory groups, the Transit Advisory Committee and the Accessible Services Advisory Committee.

The TAC helps Metro improve transit services, planning, and programs by advising Metro’s staff members and general manager, the King County Executive and Council, local jurisdictions, and subarea transportation boards on transit policy issues.

The commission’s role is to:

- Advise Metro on the inception and development of long-range planning efforts.
- Advise Metro, King County, local jurisdictions, and subarea transportation forums on issues essential to transit service in King County, including matters of concern to the elderly and persons with disabilities.
- Serve as a resource for transit promotion.

Commission members are appointed by the King County Executive and confirmed by the King County Council for two-year terms. The commission includes residents, business representatives, and other stakeholders concerned about transit service in the county. Most are bus riders. All live in King County, and collectively they reflect the county’s diversity. At least half are people who have disabilities, are elderly, or work with these populations.

Table 2 on page 23 displays the current demographic makeup of the Transit Advisory Commission, including the members with disabilities. Consistent with the County’s Equity and Social Justice Strategic Plan, race, language, age, disability, and gender are factors used during recruitment to assure the TAC is representative of the diversity of the county, which is Metro’s service area. Information about the TAC, including the application form, is available on Metro’s website in English and Spanish (<https://www.kingcounty.gov/depts/transportation/metro/about/advisory-groups/transit-advisory-commission.aspx>).

The TAC is invited to brief the County Council, including the Regional Transit Committee, on transit issues. The TAC designates a member to serve on each of Metro’s Sounding Boards, described below.

**Access Paratransit Advisory Committee.** The Access Paratransit Advisory Committee was established in November 2018 (Ordinance 18838). This new committee is intended to advise Metro and King County on issues related to Metro’s Access paratransit service.

The committee is to have at least nine members who are appointed by the King County Executive and confirmed by the King County Council for four-year terms. Members of the Access Paratransit Advisory Committee are to include Access paratransit riders, family members of Access paratransit riders, representatives of organizations that provide services to Access paratransit riders, and representatives of organizations that support LEP Access paratransit riders or potential riders.

The Access Paratransit Advisory Committee is required to provide verbal reports to the King County Council, as well as to prepare an annual report for the King County Executive and Council, beginning in August 2020, that must include:

- A review of and comment on Metro’s annual performance metrics and trends relevant to Access paratransit;
- A review of and comment on information from customer surveys distributed by Metro relevant to Access paratransit;
- A summary of areas of strength, deficiency, or priorities for improvement in the provision of Access paratransit services; and
- An overall assessment of Access paratransit service for the prior year.

The Access Paratransit Advisory Committee will replace the **Access Paratransit Task Force**, a group that was created by Metro in April 2018 to enhance the Access paratransit program by advising the agency on priorities and areas of mutual concern while developing a vision for ongoing improvements. Task Force members have indicated their willingness to continue to serve until members of the new Access Paratransit Advisory Committee can be appointed and confirmed. As of the writing of this report, members of the advisory committee are not yet in place and the task force is continuing to meet.

### **Project-specific Engagement**

In addition to involving the public through the Transit Advisory Commission and Access Paratransit Advisory Committee, Metro initiates public engagement processes to invite the general riding and non-riding public to help shape decisions regarding new transit service, changes to existing service, reinvestments of existing service resources, and potential changes to fares and fees, in accordance with Metro’s Strategic Plan and Service Guidelines.

When developing proposals for major service changes, we design an engagement process that seeks to involve people affected by the change, including:

- Riders of affected routes
- Residents of areas around affected routes
- Community groups and neighborhood councils
- Organizations that serve underrepresented and transit-dependent populations
- Staff and elected officials from local jurisdictions
- Major institutions (e.g. University of Washington)
- Employers
- Partner transit agencies (e.g. Sound Transit)

We use information and input from community members to develop service proposals that respond to the community’s expressed needs. Service proposals often include alternatives for coverage, frequency, and span of service. Alternatives may also present variations for peak and all-day service, local and express service, and other aspects of service.

We inform and solicit input from the community through methods such as public meetings, questionnaires, conversations with community groups, social media, news releases, advertisements, and

Sounding Board meetings (see below). We involve people early in the planning process, presenting preliminary concepts and gathering input that is then used to develop proposals that are presented in a second round of outreach.

In every community engagement project, we research the demographics of those who may be affected by the change being considered. Depending on the scale and scope of the project, information from the U.S. Census, American Community Survey, local school districts, and/or targeted research with organizations serving transit-dependent populations is used to determine the best way to reach minority and LEP persons in the affected community.

We design outreach strategies to reach these populations, creatively seeking to engage those who would not otherwise learn about our process via mainstream communication channels.

A primary approach Metro takes is to partner with community-based organizations to design the most appropriate ways to engage those they serve. Other outreach efforts include:

- Distributing translated, transcreated, and large-print materials through community-based organizations, open houses and information tables.
- Hosting information tables at locations that serve minority and underrepresented populations, such as food banks, human service organizations, libraries, low-income housing, and cultural organizations.
- Working with community partners to host meetings designed in formats, locations and at times that are appropriate for LEP populations.
- Going door-to-door or boarding buses to reach people directly, using interpreters or translated materials as necessary.
- Providing information and purchasing advertising from community media and local publications.
- Posting information at key community locations serving minority and underrepresented populations.
- Using dedicated language phone lines, as needed, for people to comment or ask questions. We return phone calls using a phone-based interpreter service that helps us answer questions and solicit feedback in the caller's native language.
- Having Metro's Accessible Services staff members available at open houses to answer questions and provide support for people with disabilities.
- Arranging for interpreters (including deaf and deaf/blind) upon request, or working with community-based organizations to facilitate conversation when appropriate.

We have also presented to or partnered with a number of organizations that serve different racial and ethnic groups, people with disabilities, or people with low incomes. Some of these groups include:

Asian Counseling and Referral Service  
African Diaspora of Washington  
Alliance of People with disAbilities  
Cambodian Cultural Alliance of Washington  
Centro de la Raza  
Chinese Information and Services Center  
Coalition of Immigrants, Refugees and  
Communities of Color (CIRCC)

East African Community Services  
Eritrean Association in Greater Seattle  
Eritrean Hall Community Center  
Ethiopian Community in Seattle  
Faith Action Network  
Filipino Chamber of Commerce of the Pacific  
Northwest  
Filipino Community of Seattle

Heritage House at the Market  
Horn of African Services  
Islamic Jafari Association of Greater Seattle  
Japanese American Citizen League Seattle  
Chapter  
Khmerican  
Latino Community Fund of Washington  
Lighthouse for the Blind  
Multicultural Education Rights Alliance  
One America  
Open Doors for Multicultural Families  
Oromo Community Organization in Seattle

Progresso: Latino Progress  
Puget Sound Sage  
Refugee and Immigrant Services NW  
Refugee Women's Alliance  
Seattle Vocational Institute  
Somali Community Services of Seattle  
Somali Community Services Coalition  
Urban Family Center  
Urban Impact Seattle  
Vietnamese Friendship Association  
White Center Community Association

When Metro is considering major service changes, we often complement broad public engagement with a **Sounding Board**. King County Code 2.124.010.A defines Sounding Boards as “geographically, topically or community-based groups convened for a limited time to consider specific transit topics.” Sounding Boards generally work with Metro staff members to develop proposals, review public feedback, and make advisory recommendations on transit service. A Sounding Board’s membership reflects the demographics of the area affected by the service change. Metro achieves this by using U.S. Census data to identify the minority groups in the service area, and then asks Sounding Board applicants to identify their demographic status on applications. We sometimes partner with community-based organizations to recruit potential Sounding Board members.

As an alternative to a Sounding Board, for some major service change proposals, Metro may convene a **Community Advisory Group** comprised of stakeholders and community members to provide a less formal mechanism for ongoing community engagement than a Sounding Board. Between 2016 and 2019, Metro convened Community Advisory Groups for:

- The September 2016 service change (Ordinance 18290) that affected five routes in Southeast Seattle and South King County as a way to provide better connections between downtown Seattle, Martin Luther King Jr. Way South in Southeast Seattle, and the city of Renton, which is located southeast of Seattle.
- The Access Paratransit procurement process, through which Metro identified the level of service expected from an Access contractor. The Community Advisory Group convened from June 2016 through September 2017, and was formed in conjunction with the Transit Planning for All inclusive planning project. The advisory group aided in interpreting customer feedback and proposing recommendations for improvement the paratransit service. The goal was to bring customers and community members, including older adults and people with disabilities, into the service planning process for the new Access contract.
- The fare simplification proposal, which was adopted by the County Council in November 2017 (by Ordinance 18608) and which took effect in July 2018. As part of the fare simplification proposal, Metro instituted a new, adult fare structure with a \$2.75 flat fare, regardless of trip time or whether a trip crosses a geographic zone boundary. The goal was to make fares easier to understand and pay, reduce travel time by speeding up boarding, and increase access and affordability for some riders.

Between 2016 and 2019, Metro convened three different community advisory-type groups to assist with improvements to Access paratransit service:

- The Access Paratransit Community Advisory Group (CAG), as described above, met during 2016 and early 2017 to provide feedback and guidance on Access service as Metro prepared to begin a procurement process to seek a vendor for the service.
- The Access RFP Work Group met during 2017 and early 2018 to provide guidance on potential improvements to Access service to inform Metro’s procurement process to seek a vendor for the service.
- The Access Paratransit Task Force was formed in April 2018 to enhance the Access paratransit program by advising Metro on priorities and areas of mutual concern while developing a vision for ongoing improvements. (As noted above, the Access Paratransit Task Force will be replaced by the newly established Access Paratransit Advisory Committee.)

The demographic compositions of the Transit Advisory Commission, the Community Advisory Groups for the September 2016 service change and fare simplification, and the Access Paratransit RFP Work Group and Task Force are summarized in Table 2 on page 23.

The research, approach, and results of Metro’s engagement for proposed transit service changes or fare/fee changes are reported in public engagement reports that are transmitted to the King County Council. These reports also document desired public engagement goals and outcomes and how well each engagement effort met those desired goals and outcomes using metrics. For example, we compare participant demographic data with ridership data to make sure we engaged and heard from a representative group of people who would be affected by the changes being planned. The public engagement reports transmitted to Council for service, fare, or fee changes implemented between 2016 and 2019 can be found in Appendix B to this report, and are described in more detail below.

### **Summary of project-specific engagement**

Metro conducted public engagement processes for six transit service changes that were implemented between July 2016 and June 2019; for a fare simplification proposal that was adopted in 2017 and took effect on July 1, 2018; and for a proposal to implement parking fees at Metro-owned parking lots, which was approved in 2018 but which has not been implemented as of the time this report was prepared. Public engagement reports that summarize the participation efforts for each of these initiatives can be found in Appendix B. (Title VI analyses<sup>3</sup> and records of adoption by the King County Council can be found in Appendix F.).

In total, these efforts engaged more than 30,000 people in helping shape service changes and fares.

As this report is written, engagement efforts are underway for future service changes in several different geographic areas in King County that will be brought to the King County Council for implementation in 2020 or beyond; a new income-based fare program that will be implemented in 2020; the development of a Mobility Framework for the equitable implementation of new mobility options; and plans to provide for regional funding and coordination for the implementation of Metro’s long-range plan.

### **Example Projects**

The following three projects highlight Metro’s efforts to meaningfully engage minority, underrepresented, and LEP populations in decision making.

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<sup>3</sup> For the proposed parking fee increase, Metro completed an Equity Impact Review in preparation for Council review of the concept. That Equity Impact Review is included in Appendix F. Within the context of the public rulemaking process for the parking fee, Metro is in the process of completing a Title VI analysis using the pricing put forth in the public rule. That Title VI analysis has not yet been completed as of the writing of this program report.

## **Project # 1**

### **Service restructure in Southeast Seattle**

In September 2016, Metro implemented a service change (Ordinance 18290) that affected five routes in Southeast Seattle and South King County as a way to provide better connections between downtown Seattle, Martin Luther King Jr. Way South in Southeast Seattle, and the city of Renton, which is located southeast of Seattle. The service change affected 52 census tracts with a total population of approximately 246,000 residents. Of the affected census tracts, 30 were classified as minority and low-income; nine as minority-only; eight as low-income only; and five as neither minority nor low-income. The affected area is one of the most linguistically diverse in the region.

Community outreach and engagement for this service change began in June 2012, following the deletion of a bus route (#42) that had previously served the area. This route had been restructured several years earlier, following the opening of Sound Transit's Link light rail service to the area, and was deleted altogether in 2012 due to poor performance relative to Metro's adopted Service Guidelines.

At the time of the deletion of Route #42, a number of community members noted that, although the community had indeed seen a significant increase in transit service with the opening of light rail and subsequent bus restructure to connect people to the light rail, there were still unmet community needs that would benefit from better transit connections.

The September 2016 service change, as implemented, increased service frequency of one route (#124), increased both the service area and frequency of two routes (#106, 107), retained peak service but discontinued midday and evening trips on one route (#9X), and deleted one route (#38) since one of the expanded routes now covered this route's former alignment with better service coverage.

### **Outreach process**

As noted above, outreach and engagement began in June 2012 with a series of conversations Metro hosted with community members and agencies to understand how people were using transit, the barriers they faced, improvements that would make it easier to use transit, how people were paying their fares, and better ways to communicate with LEP communities.

We followed that initial engagement with a survey of riders and worked with community organizations to broaden the survey's reach. That survey and public feedback on other potential Metro service changes indicated interest in extending Route #106 to downtown Seattle to create better connections between downtown Seattle, the city of Renton, and the Southeast Seattle neighborhoods between the two.

In May 2015, Metro formed a Community Advisory Group to study potential service changes in this area in more detail. The group, which included community members and stakeholders, met three times over the next several months to help shape the service change proposal, the timeline, and the outreach process.

As part of the engagement process, Metro:

- Posted information about the project and how to provide input on Metro's website;
- Shared information through the Metro Matters blog, Twitter, and Facebook;
- Posted rider alerts at bus stops;
- Mailed the rider alert and a multi-lingual handout that was available in Amharic, Cambodian/Khmer, Chinese, Hmong, Korean, Oromo, Somali, Spanish, Tagalog, Tigrinya, and Vietnamese, to key community institutions (libraries, schools, and community centers) and asked them to share the information with community members;
- Sent email and text message alerts to subscribers of the relevant routes; and

- Contacted major employers, neighborhood councils, community-based organizations, human services and health providers, and schools to ask them to help us engage with the people they serve.

In addition, we hosted a public open house at the Filipino Community Center and attended open houses hosted by the Georgetown Community Council and Georgetown Merchants Association. We also engaged with several trusted advocates (Asian Counseling and Referral Service, Filipino Community Center, and El Centro de la Raza), community-based organizations that serve populations with limited or no English proficiency. We worked with these trusted advocates to facilitate conversations at small and large group sessions in multiple languages and to distribute paper surveys to clients receiving services.

### **Participation**

In addition to the work of the community advisory group, we received 674 survey responses and 100 emails, phone calls, letters, and blog comments. We talked directly with 55 people at open houses and 250 through trusted advocate outreach.

### **Results**

In the end, thanks to funding support from the City of Seattle, the King County Council was able to approve a full restructure that included the changes to the five routes described above. The restructure has improved transit connections to and through the community, meeting needs identified by community members. As part of the engagement and Title VI analysis process, one census tract was identified as having an adverse impact from the service change; however, that adverse impact was mitigated by the increased service and connections provided by the restructure.

## **Project #2**

### **Service Restructure required by Light Rail Construction**

In September 2018, Metro implemented a service change (Ordinance 18685) that affected seven Metro routes between downtown Seattle and points south and east due to the closure of the I-90 Rainier Avenue Freeway Station and the D2 high occupancy vehicle (HOV) roadway between I-90 and Fifth Avenue in Southeast Seattle. The bus station and HOV roadway closed permanently in September 2018 as part of the construction of Sound Transit’s East Link light rail project.<sup>4</sup>

Because the Rainier Avenue Freeway Station provided important access to the Eastside and downtown Seattle for communities in Southeast Seattle, Metro worked with bus riders and community members to design a restructure that would provide alternate connections during light rail construction. Once light rail construction is complete, in 2023, the Rainier Avenue Freeway Station will reopen as the Judkins Park light rail station.

The service change affected 33 census tracts with a total population of approximately 179,000 residents. Of the affected census tracts, 13 were classified as minority and low-income; 11 as minority-only; two as low-income only; and seven as neither minority nor low-income. The area is demographically diverse, including a higher minority makeup (51 percent) than the state (29 percent) and national (37 percent) averages. The community has high numbers of people who were born in another country and there are significant percentages of the population for whom English is a second language.

The service change, as implemented, moved six of the seven affected Metro routes (#111, 114, 214, 216, 218, and 219) to the I-90 mainline to bypass the closed station while not unduly delaying passengers of

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<sup>4</sup> Two Sound Transit regional express bus routes were also affected by the Rainier Avenue Freeway Station closure, but their restructure was managed under the oversight of the Sound Transit board and not through Metro Transit and the King County Council.

those routes. However, in recognition of the fact that elimination of the Rainier Avenue Freeway Station would result in decreased service for riders traveling between Rainier Avenue South and destinations and jobs in East King County, the service change revised one of the routes (#212, in reverse peak direction trips) to enter and exit I-90 at Rainier Avenue, providing a replacement stop on Rainier Avenue within one-half mile of the closed station. Metro also implemented a similar change in the peak direction for Route #217, though this change did not meet the threshold (more than one-half mile distance from the replacement stop) to require action by the King County Council.

### **Outreach process**

To help riders plan for the changes that would result from the station closure, Metro and Sound Transit partnered on a “plan ahead” outreach effort that included drop-in sessions, notifications at transit stops and centers in the corridor, and an online information center and online open house. Specific outreach methods included:

- In-person drop-in sessions and street team outreach at 11 different transit centers;
- Information for Metro operators and customer information staff so that they could answer rider questions accurately and quickly;
- Online open house, which provided information 24/7 and accepted written comments;
- Project website, which was accessible in English, Spanish, Somali, Chinese, Vietnamese, Korean, Arabic, Russian, and Amharic;
- Social media notifications and posts;
- Email updates;
- Advertisements including ethnic media;
- Fact sheets available in English, Spanish, Somali, Chinese, Vietnamese, Korean, Arabic, Russian, and Amharic;
- Contacts with 60 stakeholder organizations and agencies, followed up with a tool kit with translated resources to distribute to the community members they serve;
- Press release and earned media; and
- Community organization phone calls and tool kits.

With the Rainier Avenue Freeway Station closing, we focused outreach on riders who use this stop to travel to the Eastside and downtown Seattle, or as a connection point to routes on Rainier Avenue to other locations. Outreach was focused on making the information accessible to LEP populations and through in-language notifications and information in the following ways:

- Metro’s Transportation Demand Management team offered an “InMotion” program to residents of Beacon Hill and Rainier Valley to prepare them for the stop closure and to provide alternative solutions, including “Just One Trip” materials that were prepared in English, Spanish, and Chinese, and distributed through local community-based organizations.
- Translated fact sheets were made available online and at in-person events in Spanish, Somali, Chinese, Vietnamese, Korean, Arabic, Russian, and Amharic.
- Community based organizations and agencies serving the community were provided with a tool kit of information including translated fact sheets, a matrix of changes by routes, and a cut-and-paste email message to send to their constituents.
- Translated advertisements were placed in ethnic media publications advertising the outreach.
- Staff prioritized the soon-to-be-closed Rainier Avenue Freeway Station for in-person outreach events, which included both a drop-in session and street teams at the Freeway stops and on the surface level on Rainier Avenue.

## **Participation**

More than 5,500 people actively engaged with outreach staff during the engagement process, including 77 comments during the online open house and 25 comments submitted through Facebook.

## **Results**

The service restructure occurred on schedule in September 2018 so that Sound Transit could begin construction work on the new light rail line in this area. Due to the extensive engagement process, Metro did not simply route buses around the closed station, but provided two bus re-routes – one reverse-peak direction and one peak direction – that allowed for connections between Southeast Seattle and destinations on the Eastside and in downtown Seattle.

## **Project #3**

### **Fare Simplification**

In July 2018, Metro instituted a new, adult fare structure with a \$2.75 flat fare, regardless of trip time or whether a trip crosses a geographic zone boundary. The goal was to make fares easier to understand and pay, reduce travel time by speeding up boarding, and increase access and affordability for some riders. ORCA LIFT (low-income), youth, senior, and disabled fares remained unchanged. Since the new, simplified fare could affect some riders in a negative way, Metro also increased the amount of subsidized tickets provided to human services agencies from \$3.6 million to \$4 million a year, eliminated the \$3 fee for Regional Reduced Fare Permits (available to seniors over age 65 and people with disabilities), and has been working to develop a new income-based fare program, which will be implemented in 2020. More information on Metro fares is available at <https://www.kingcounty.gov/depts/transportation/metro/fares-orca.aspx>.

To assess the equity impacts of the fare proposal, we first estimated boardings by full-fare adult riders paying with cash, E-purse, or retail passes, on low-income, non-low-income, minority, and non-minority routes.<sup>5</sup> We then compared the average fare paid by full-fare adult riders on low-income routes with non-low-income routes, and by full-fare adult riders on minority routes with non-minority routes.

Under Metro's previous fare structure, the average fare paid by full-fare adult riders (without employer provided passes) on low-income routes was slightly higher (two cents) than the average full adult fare paid by riders on non-low-income routes. Similarly, the average fare paid by full-fare adult riders on minority routes was somewhat higher (five cents) than the average full adult fare paid by riders on non-minority routes. Metro's proposal to simplify fares by implementing a \$2.75 adult flat fare for all times of day throughout King County was designed, in part, to eliminate these disparities.

To gain perspective from riders as the fare simplification proposal was developed, and to attempt to mitigate any potentially negative impacts, Metro conducted an extensive information-gathering and engagement process. At each phase, opportunities to provide feedback were promoted through print, radio, and television news; Twitter, Facebook, transit alerts, posters, street teams, and a network of stakeholders.

## **Outreach process**

Metro began the engagement process with a preliminary online questionnaire that assessed basic information about how easily riders could understand and afford Metro's fares.

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<sup>5</sup> Boardings made with employer-provided Passport passes were excluded from this analysis, as were boardings by ORCA LIFT (low-income fare), youth and senior/disabled riders since these customers would not be directly affected by the proposed fare change.

We then assembled a stakeholder advisory group, briefed and interviewed interested groups, and contracted with several community-based organizations (World Relief, White Center Community Development Association, and Hopelink) to involve the general public, diverse community members, people with low incomes, LEP persons, and other populations less likely to respond to online questionnaires.

This outreach, specifically the outreach conducted through community-based organizations, engaged people speaking the following languages: Amharic, Arabic, Cambodian, Chinese, Dari, Ekironi, English, Farsi, Khmer, Mam, Pashto, Punjabi/Hindu, Russian, Samoan, Somali, Spanish, Swahili, Tagalog, Tigrinya, Turkish, Twi, Ukrainian, Urdu, and Vietnamese.

To engage local leaders, Metro also convened a Regional Fare Forum of elected officials.

After the first round of information-gathering and initial recommendations from the Regional Fare Forum, Metro developed five potential fare options for more review. These five options were narrowed to two based on public feedback and input from the stakeholder advisory group.

For the next phase of engagement, Metro asked for feedback on the two outstanding options – a \$2.75 flat fare or a \$3.00 peak period fare – through a second online questionnaire, additional street teams, and two public meetings. Employers who participate in the employee pass programs were also asked to complete an online questionnaire.

This process led Metro to the proposal for a \$2.75 flat fare, as well as for the related proposals described above to mitigate the impact of the fare change on low-income people.

### **Participation**

During the engagement process, Metro received more than 12,000 comments, including 4,487 to the first online questionnaire and 6,500 to the second online questionnaire. More than 900 people participated in Metro's open houses, either in person or via webcast, and 311 people participated through community-based organizations.

### **Results**

The \$2.75 flat fare was implemented beginning in July 2018. Metro continues to study options – in addition to its ORCA LIFT low-income fare and human services bus ticket program – to ensure that transit is accessible and affordable to people throughout the community. As this report is written, we are conducting an engagement process to design an income-based fare program that will be implemented beginning in 2020.

A list of provider agencies receiving human services bus tickets during 2019 to distribute to the people they serve can be found in Appendix G to this report. An ORCA LIFT report for the first quarter of 2019 can be found in Appendix H.

## **Membership of Committees**

As described above, Metro is committed to robust engagement and participation. As part of our work to engage with the community members we serve, Metro relies on a number of permanent and ad hoc advisory committees. One of these committees, the Transit Advisory Commission, provides ongoing guidance on Metro's operations. Other committees are formed as needed to provide structured ways for community members to engage on a specific issue, such as a service change.

With each committee, we work towards membership that represents the communities we serve. We encourage people of color, those with low incomes, people with disabilities, and those with limited English proficiency to serve on committees and provide staff assistance or other support to help them serve.

Table 2 below shows the racial/ethnic breakdown of Metro’s advisory committee membership, as well as LEP members, those who have disabilities, and those who represent people with low incomes.

The Transit Advisory Commission is a permanent committee. Other work groups or advisory committees convened during the time period covered by this report were ad hoc committees whose work is complete.

**Table 2  
Advisory Committee Membership**

	<b>Transit Advisory Comm</b>	<b>Sept 2016 Service Change Adv Group</b>	<b>Fare Advisory Group</b>	<b>Access Paratransit Community Advisory Group</b>	<b>Access Paratransit RFP Work Group</b>	<b>Access Paratransit Task Force*</b>
African American	5	0	5	4	3	3
Asian-Pacific Islander	3	4	0	1	1	4
Caucasian	8	4	13	6	10	11
Hispanic	1	1	1	0	0	0
Limited English proficiency	0	0	0	0	0	0
Person with disabilities	9	1	3	0	4	9
Low income representative	0	0	4	7	1	7

\*The Access Paratransit Task Force was replaced with the new Access Paratransit Advisory Committee by Ordinance 18838 in November 2018. Members of this new Advisory Committee have not yet been appointed as of the writing of this report, and in the interim the Task Force is continuing to meet.

## Language Assistance Plan

Metro has a program in place to ensure that LEP persons have access to our services and to public participation opportunities. The following is a summary of the program. The full plan is attached as Appendix C to this report.

The King County Executive’s Office has identified the areas of the county where LEP persons speaking different languages reside, as well as the non-English languages most commonly spoken in the county (Metro’s service area). We rely on these findings, which are based on five data sources, in our language assistance program.

Our practice, per County policy, is to translate public communication materials and vital documents into Spanish—by far the most commonly spoken non-English language in King County, and the language that has been identified as the Tier 1 language by the King County Executive—when translation is feasible within available resources. Most materials include the interpreter symbol and the phone number for Metro’s Customer Service, which can provide live interpretation in Spanish or other languages as needed

with the assistance of a Language Line service. In addition, most materials posted on Metro's website can be translated into multiple languages using Google Translate.

Per the King County Executive's written order on translation, materials are translated into other commonly spoken non-English languages when those are the primary language spoken by five percent or more of the target audience. We may use alternative forms of language assistance, such as partnering with community-based organizations for outreach or interpretation services, when the alternative is more effective or practical.

Available data and Metro's experience affirm that many refugees and immigrants who may have limited English proficiency rely on transit, and we offer a number of language resources to assist these customers. These include translated communication materials about Metro service, interpretation offered through Customer Services staff using a Language Line service, signage that uses widely recognized pictograph symbols, notices of Title VI obligations and remedies in nine commonly spoken languages, and multi-lingual community travel videos that are posted online and have been distributed to community-based organizations.

When Metro conducts outreach and engagement concerning proposed service changes, we provide, as needed, translated descriptions of the proposals and questionnaires, offer interpretation at public meetings, work with community-based organizations to assist us in communicating with LEP persons, and provide telephone comment lines for non-English-speakers. See Appendix C for more information.

## **Monitoring Subrecipient Compliance with Title VI**

To ensure that all subrecipients comply with Title VI regulations, Metro's grants staff and program managers monitor the performance of subrecipients annually. The subrecipient monitoring process is summarized below. Metro will be collecting Title VI plans from all new subrecipients in 2019, and any new subrecipients would have to submit a Title VI plan at the time of contracting. Note: If a subrecipient is already a direct recipient of FTA funds, King County is not responsible for monitoring the subrecipient's Title VI compliance. A list of subrecipients can be found in Appendix D.

Grants staff:

- Complete a Risk Assessment for subrecipients prior to entering an agreement with them.
- Ensure that project agreements with subrecipients contain all required federal documents and clauses.
- Request that subrecipients provide to Metro information related to the Federal Funding Accountability and Transparency Act (FFATA) and a copy of the subrecipient's Title VI plan.
- Review the Title VI plan, if required. Review includes sample notices to the public informing them of their rights under Title VI, sample procedures on how to file a Title VI complaint, sample procedures for tracking and investigating Title VI complaints, and expectations for the subrecipient to notify King County when a Title VI complaint is received.
- File a copy of the subrecipient agreement/contract, FFATA form and Title VI plan, if available, in the Grants Office Official Subrecipient File.
- Submit FFATA information in the [www.FSRS.gov](http://www.FSRS.gov) website.
- Review a copy of their A-133 audit report on the State Auditor's Office website. If the subrecipient received less than \$750,000 in federal funding from all sources, a letter will be sent requesting other official financial documentation to allow review of the entity's finances.
- Review financial paperwork and communicate information to project managers. If necessary, request that project managers closely monitor the subrecipient.

Project managers:

- Maintain ongoing communication with the subrecipient and manage the subrecipient agreement or contract, as well as review and approve subrecipient invoices and the supporting documentation.
- Report on the subrecipient's progress on FTA quarterly milestone progress reports.
- Gather documents from subrecipients to ensure they are complying with Title VI, if applicable.

## **Project Example**

### **City of Redmond – Go Redmond Program**

The Go Redmond Program is a comprehensive program of Transportation Demand Management (TDM) strategies to increase alternative transportation options and decrease single occupant vehicle (SOV) trips within the City of Redmond. The program involves the development of educational materials, implementation of a number of marketing efforts, and sponsorship of community events, as well as the provision of incentives through employers and directly to residents. The program includes Metro's School Pool program, which has the goal of increasing formation of carpools by residents taking their children to school. All of these efforts promote the use of transit, carpools, vanpools, biking, walking and other alternatives to SOV travel.

The City of Redmond is leading this effort, with King County Metro providing some of the funding for staff efforts, educational resources and incentives through sub-grants of FTA funds. A project agreement clearly spells out the funded project elements and specifies the requirements the City must follow to ensure compliance with FTA requirements. In addition, Metro worked with the City of Redmond on a Title VI plan that was adopted by the Redmond City Council that complies with FTA requirements.

## **Review of Facilities Constructed**

Metro did not build any storage facilities, maintenance facilities or operation centers that require a Title VI analysis during the period covered by this report.

## **Documentation of Governing Body Review and Approval of Title VI Program**

The King County Council is required to approve this Title VI Program. Documentation of County Council action will be added as Appendix I when the approval process is completed, and will be included in the transmittal that is submitted to the FTA.

## SECTION II: Requirements of Transit Providers

### Service Standards and Service Policies

Metro’s service standards and service policies can be found in our adopted Service Guidelines (which were updated most recently in 2016 by Ordinance 18301). The adopted Service Guidelines are included in Appendix E.

The analyses discussed below use the adopted Service Guidelines and data from recent performance to compare minority routes and areas with non-minority routes and areas; and low-income routes and areas with non-low-income route and areas. Unless otherwise noted, the data for these comparisons comes from Metro’s spring 2018 service period, which covered March 10 through June 15, 2018. This is the most recent full service period for which the data necessary for these analyses is available.

The methodology Metro developed to identify minority and low-income routes is based on boardings in minority and low-income census tracts. Metro sent this methodology to FTA for review on March 13, 2013, and it was adopted as part of Metro’s Service Guidelines (Ordinance 18301). The methodology for designating “minority routes” follows. The “low-income” designation is based on a similar methodology.

#### Minority Route Methodology

Metro uses data from the U.S. Census and from automatic passenger counters (APC) to define bus routes that serve predominantly minority census tracts. Metro classifies a census tract as a minority tract if the percentage of non-white and Hispanic residents in that tract is higher than the percentage in King County as a whole.

Metro next identifies an “inbound” direction for each route. Boardings on inbound trips best reflect the residential location of riders on that route. The inbound direction is easily determined for routes serving Seattle’s central business district (CBD). If a route does not serve the Seattle CBD, the inbound direction generally is chosen as the direction to a major employment center. Using data from the APCs, Metro counts inbound passenger boardings for each route by census tract.

We next compare the percentage of each route’s inbound boardings that are in minority tracts with the percentage of all inbound boardings in minority tracts system-wide. If a route’s percentage of minority tract boardings is higher than the system average, that route is classified as a minority route. Based on the latest available APC data (2018), 49.8 percent or more of boardings on a route must be in a minority tract for that route to be classified as a minority route.

Metro does not have APC data for its Dial-A-Ride Transit (DART) service, so the number of stops in minority tracts is used to define minority DART routes. If the percentage of a DART route’s stops that are in minority tracts is higher than the system average for all routes, that DART route is defined as a minority route. DART makes up less than three percent of Metro’s service hours. In 2018, 48 percent of bus stops must be in a minority tract for a DART route to be classified as a minority route.

## Vehicle Load

Metro’s load standard is defined in our Service Guidelines.

Passenger loads are averaged on a per trip basis using counts from a service change period. Trips must have average maximum loads higher than the thresholds for the service change period to be identified as overcrowded. Two metrics are used to measure passenger loads: crowding and the amount of time the bus has a standing load (standing load time).

Overcrowding occurs when the average maximum load of a trip exceeds its passenger load threshold. A passenger load threshold is calculated for each trip, based on the characteristics of the bus type scheduled for the trip. This threshold is determined by:

- The number of seats on the bus, plus
- The number of standing people that can fit on the bus, in which each standing person is given no less than four square feet of floor space.

A trip’s standing load time is determined by measuring the amount of time that the number of passengers on the bus exceeds the number of seats.

- No trip on a route should have a standing load for 20 minutes or longer.

Routes with overcrowded trips or standing loads for more than 20 minutes are identified as candidates for investment. These candidates are analyzed in detail to determine appropriate actions to alleviate overcrowding, including:

- Assigning a larger vehicle to the trip, if available;
- Adjusting the spacing of trips within a 20-minute period; or
- Adding trips.

Table 3 and Figure 1 show the average vehicle loads and load factors for Metro routes for each time period between minority and non-minority routes. Loads and load factors are lower for minority routes than for non-minority routes in the peak periods. In midday, when average loads are lower than they are in the peak periods, minority routes have slightly higher loads than non-minority routes. Despite crowding occurring on individual trips, the average loads on Metro buses are below the number of seats per bus for both minority and non-minority routes.

**Table 3**  
**Average Loads by Minority Classification, Spring 2018**

	AM Peak IB		Midday IB & OB		PM Peak OB	
	Load/Seats	Avg Load	Load/Seats	Avg Load	Load/Seats	Avg Load
Minority route	0.48	30.59	0.34	20.98	0.51	31.89
Non-minority route	0.56	38.75	0.33	21.53	0.56	38.13
<i>System</i>	<i>0.52</i>	<i>34.65</i>	<i>0.33</i>	<i>21.22</i>	<i>0.53</i>	<i>34.96</i>

Key: IB = Inbound; OB = Outbound

**Figure 1**  
**Weekday Average Loads by Minority Status, Spring 2018**

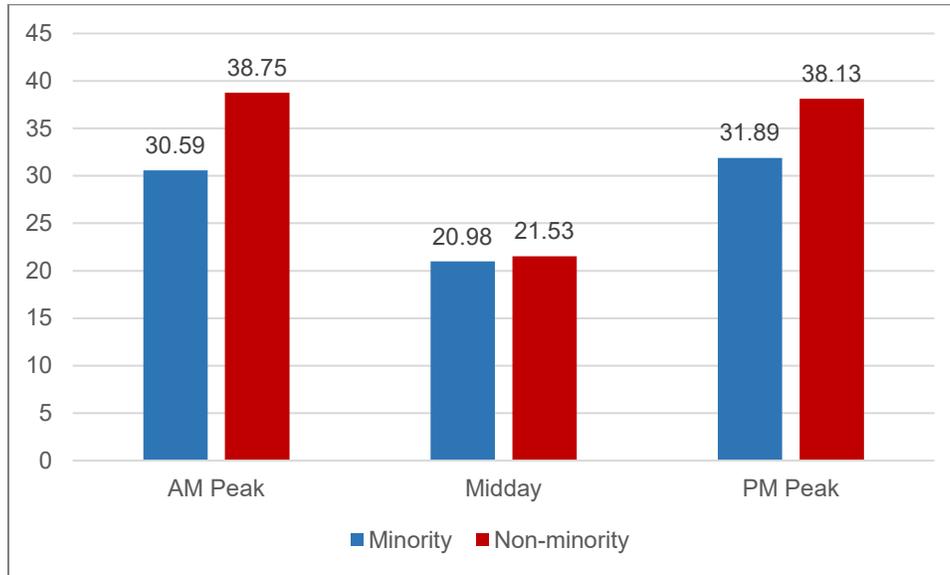


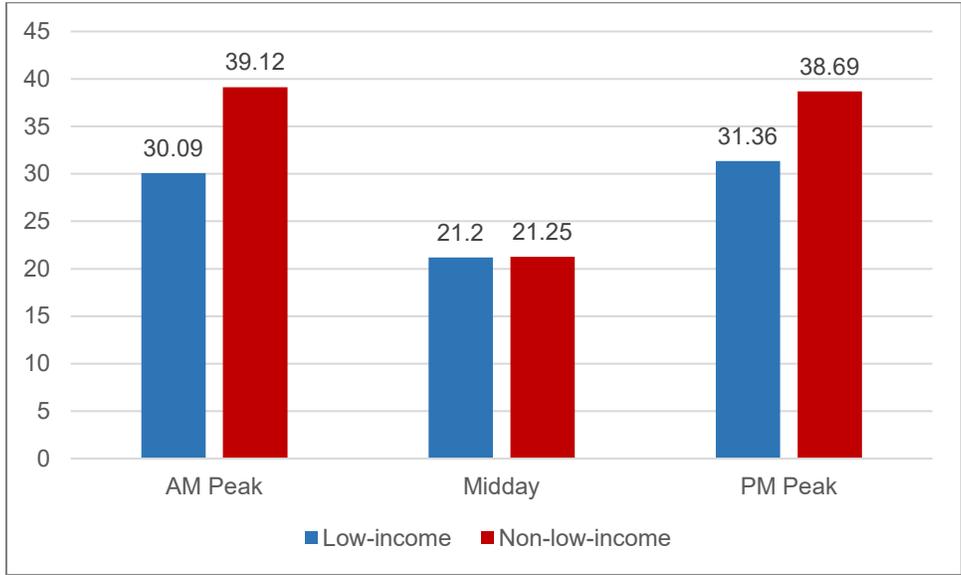
Table 4 and Figure 2 show the average vehicle loads and load factors for Metro routes for each time period between low-income and non-low-income routes. Loads and load factors are generally lower for low-income than for non-low-income routes in the peak periods, and about the same in midday. Despite crowding occurring on individual trips, the average loads on Metro buses are below the number of seats per bus for both low-income and non-low-income routes.

**Table 4**  
**Average Loads by Low-Income Classification, Spring 2018**

	AM Peak IB		Midday IB & OB		PM Peak OB	
	Load/Seats	Avg Load	Load/Seats	Avg Load	Load/Seats	Avg Load
Low-income route	0.46	30.09	0.33	21.20	0.49	31.36
Non-low-income	0.58	39.12	0.33	21.25	0.58	38.69
<i>System</i>	<i>0.52</i>	<i>34.65</i>	<i>0.33</i>	<i>21.22</i>	<i>0.53</i>	<i>34.96</i>

Key: IB = Inbound; OB = Outbound

**Figure 2**  
**Weekday Average Loads by Low-Income Status, Spring 2018**



Average loads within all time periods indicate significant available capacity in the Metro system. However, specific trips can be crowded even if there is capacity available on average. Based on Metro’s 2018 Service Evaluation (Motion 15319), 17 routes can be identified as needing additional trips to reduce crowding based on Metro’s loading guidelines. The addition of trips to reduce overcrowding is the first investment priority in Metro’s Service Guidelines. Routes needing trips to reduce weekday crowding are listed in Table 5. Of these routes, nine were classified as minority, five as both minority and low-income, and five as low-income only. The remaining routes were non-minority and non-low-income.

**Table 5**  
**Routes Needing Investment to Reduce Weekday Passenger Crowding, 2018 System Evaluation**

Route	Minority Route	Low Income Route	Daily One-Way Trips Needed
5	NO	NO	1
14	YES	YES	1
15EX	NO	NO	2
17EX	NO	NO	1
18EX	NO	NO	1
33	NO	NO	1
50	YES	YES	2
102	YES	YES	1
111	YES	NO	1
120	YES	YES	1
123	NO	NO	1

Route	Minority Route	Low Income Route	Daily One-Way Trips Needed
216	YES	NO	1
218	YES	NO	1
219	YES	NO	1
252	NO	NO	1
301	YES	YES	1
312	NO	NO	1
C Line	NO	NO	3

### Vehicle Headways

Metro’s Service Guidelines (which can be found in Appendix E) define service levels based on frequency of service. These levels are shown in Table 6:

**Table 6  
Summary of Typical Service Levels by Family**

Service Level	Service Level: Frequency (minutes) & Time Period			Days of Service	Hours of Service
	Peak	Off-peak	Night		
Very frequent	15 or more frequent	15 or more frequent	30 or more frequent	7 days	16-24 hours
Frequent	15 or more frequent	30	30	7 days	16-24 hours
Local	30	30-60	--*	5-7 days	12-16 hours
Hourly	60	60	--	5 days	8-12 hours
Peak-only	8 trips/day minimum	--	--	5 days	Peak
Alternative services	Determined by demand and community collaboration process				

\*Night service on local corridors is determined by ridership and connections.

**Very frequent services** provide the highest levels of all-day service. Very frequent corridors serve very large employment and transit activity centers and very dense residential areas.

**Frequent services** provide high levels of all-day service. Frequent corridors generally serve major employment and transit activity centers and very dense residential areas.

**Local services** provide a moderate level of all-day service. Local corridors generally serve regional growth centers and residential areas with low to medium density.

**Hourly services** provide all-day service at 60 minute frequencies. Corridors generally connect low-density residential areas to regional growth centers.

**Peak-only services** provide specialized service in the periods of highest demand for travel. Peak services generally provide service to a major employment center in the morning and away from a major employment center in the afternoon.

**Alternative service** is any non-fixed-route service directly provided or supported by Metro.

In spring 2018, average headways were similar (less than a three-minute difference) for minority and non-minority routes during most time periods on weekdays. Night-time routes had a larger difference. Average headways were five to nine minutes longer for minority routes than for non-minority routes on night routes. One reason could be that minority routes had longer spans, and service tends to be less frequent later in the night period. For example, service might be every 30 minutes until midnight and every hour after that; a route that extended until 2:00 a.m. would therefore have a worse average headway than one that ended service at midnight. Minority routes had longer average spans (operated during more hours per day). Average trips were generally similar, with minority routes having more average trips on weekdays. Table 7 shows average headways by minority classification for the Spring 2018 period.

**Table 7**  
**Average Headways by Minority Classification, Spring 2018**

WEEKDAY	Average Headway (Minutes between Buses)					Average Span (Hours)	Average # Trips
	AM Peak	Midday	PM Peak	Evening	Night		
Minority route	20	27	21	25	35	12.9	36
Non-minority route	21	30	22	22	26	10.7	31
<i>System</i>	21	28	22	24	31	11.8	34
SATURDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Minority route	30	26	29	16.4	40		
Non-minority route	33	22	24	16.2	42		
<i>System</i>	31	25	27	16.3	40		
SUNDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Minority route	33	27	29	16.9	37		
Non-minority route	33	24	24	16.7	39		
<i>System</i>	33	26	27	216.8	38		

In spring 2018, low-income routes had generally similar or lower headways than non-low-income routes. Low-income routes had longer average spans of service and more average trips per day. Table 8 shows average headways by income classification for the Spring 2018 period.

**Table 8**  
Average Headways by Low-Income Classification, Spring 2018

WEEKDAY	Average Headway (Minutes between Buses)					Average Span (Hours)	Average # Trips
	AM Peak	Midday	PM Peak	Evening	Night		
Low-income route	21	28	21	24	33	13.5	38
Non-Low-income	21	29	22	23	28	10.1	29
<i>System</i>	21	28	22	24			
SATURDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Low-income route	32	24	27	16.3	40		
Non-Low-income	30	25	26	16.4	41		
<i>System</i>	31	25	27	16.3	40		
SUNDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Low-income route	32	25	29	17.1	38		
Non-Low-income	34	26	24	16.4	36		
<i>System</i>	33	26	27	16.8	38		

### On-Time Performance

Metro measures on-time performance for every route. “On-time” is defined as service passing a scheduled time point between one minute before and five minutes after scheduled time. Metro has a general goal of 80 percent on-time performance at the system level, with additional specific guidelines at the route level.

In spring 2018, there was little difference in on-time performance between minority and non-minority routes (Table 9), or between low-income and non-low-income routes (Table 10). Minority routes were about the same as non-minority routes on weekends, and slightly less on-time on weekdays. Low-income routes were slightly less on-time than non-low-income routes.

**Table 9**  
Average On-Time Performance by Minority Classification, Spring 2018

WEEKDAY	% On Time	% Late	% Early
Minority route	77%	17%	6%
Non-minority route	80%	16%	4%
<i>System</i>	78%	17%	5%
SATURDAY	% On Time	% Late	% Early
Minority route	78%	15%	6%
Non-minority route	79%	15%	5%
<i>System</i>	79%	17%	6%
SUNDAY	% On Time	% Late	% Early
Minority route	81%	12%	6%
Non-minority route	81%	14%	5%
<i>System</i>	81%	13%	6%

**Table 10**  
**Average On-Time Performance by Income Classification, Spring 2018**

<b>WEEKDAY</b>	<b>% On Time</b>	<b>% Late</b>	<b>% Early</b>
Low-income route	78%	16%	6%
Non-low-income route	79%	17%	4%
<i>System</i>	78%	17%	5%
<b>SATURDAY</b>	<b>% On Time</b>	<b>% Late</b>	<b>% Early</b>
Low-income route	78%	15%	7%
Non-low-income route	80%	15%	5%
<i>System</i>	79%	17%	6%
<b>SUNDAY</b>	<b>% On Time</b>	<b>% Late</b>	<b>% Early</b>
Low-income route	80%	13%	7%
Non-low-income route	83%	13%	4%
<i>System</i>	81%	13%	6%

At the route level, Metro’s Service Guidelines define routes as having schedule reliability problems based on weekday, weekday PM peak, and weekend averages, as shown in Table 11. This data helps us determine where service investments are needed.

**Table 11**  
**Lateness Threshold by Time Period (Metro Service Guidelines)**

<b>Time Period</b>	<b>Lateness threshold (Excludes early trips)</b>
Weekday average	> 20%
Weekday PM peak average	> 35%
Weekend average	> 20%

Table 12 shows the 62 routes that, based on Metro’s 2018 Service Evaluation (Motion 15319), have been identified as needing service investments to improve their reliability. Investment in routes with reliability problems is the second priority in Metro’s Service Guidelines, after investment in routes with overcrowding. Of these 62 routes, 33 are minority routes and 29 are low-income routes, with 22 being both minority and low-income. Among routes needing investment to improve reliability, the proportion of minority and low-income routes is roughly equal to the number of non-minority and non-low-income routes, respectively.

**Table 12**  
**Routes Needing Investment to Improve Schedule Reliability, 2018 System Evaluation**

<b>Route</b>	<b>Day Needing Investment</b>	<b>Minority Route</b>	<b>Low-Income Route</b>
1	Saturday	NO	NO
5EX	Weekday	NO	NO
5	Weekday, Saturday	NO	NO
8	Weekday, Saturday, Sunday	NO	YES

Route	Day Needing Investment	Minority Route	Low-Income Route
11	Saturday, Sunday	NO	YES
17EX	Weekday	NO	NO
18EX	Weekday	NO	NO
21	Weekday, Saturday	YES	YES
24	Weekday, Saturday	NO	NO
26EX	Weekday, Saturday	NO	NO
27	Saturday	YES	YES
28EX	Saturday, Sunday	NO	NO
33	Saturday	NO	NO
37	Weekday	NO	NO
40	Saturday, Sunday	NO	NO
56	Weekday	NO	NO
62	Weekday, Saturday, Sunday	NO	NO
63	Weekday	NO	YES
64	Weekday	NO	NO
70	Saturday	NO	YES
105	Weekday	YES	YES
106	Weekday	YES	YES
107	Weekday	YES	YES
111	Weekday	YES	NO
113	Weekday	YES	YES
114	Weekday	YES	YES
116	Weekday	NO	NO
122	Weekday	YES	NO
123	Weekday	NO	NO
124	Saturday	YES	YES
131	Weekday, Saturday	YES	YES
132	Saturday	YES	YES
143	Weekday	NO	NO
148	Saturday	YES	YES
150	Sunday	YES	YES
157	Weekday	YES	NO
158	Weekday	YES	YES
159	Weekday	YES	YES
166	Weekday	YES	YES
168	Sunday	NO	YES
169	Saturday	YES	YES
177	Weekday	YES	YES
178	Weekday	YES	YES
179	Weekday	YES	YES

Route	Day Needing Investment	Minority Route	Low-Income Route
182	Saturday	YES	YES
190	Weekday	YES	YES
192	Weekday	YES	YES
208	Weekday	NO	YES
212	Weekday	YES	NO
214	Weekday	NO	YES
216	Weekday	YES	NO
218	Weekday	YES	NO
219	Weekday	YES	NO
235	Weekday	NO	NO
236	Saturday	NO	NO
238	Sunday	NO	NO
240	Weekday	YES	NO
244	Weekday	NO	NO
249	Saturday	YES	NO
268	Weekday	YES	NO
355	Weekday	NO	NO
E Line	Weekday	YES	NO

### Service Availability

Metro strives to make service available in accordance with Metro Strategic Plan Goal 2, “Provide equitable opportunities for people from all areas of King County to access the public transportation system.” Availability is measured by calculating the number of housing units within one-quarter-mile walk to a bus stop; within two miles to a permanent park-and-ride, a Sounder commuter train or Link light rail station, or a transit center with parking; or within an area served by a DART bus route. To assess equitable access, we compare the availability of service in census tracts that have a higher proportion of low-income and minority households than the county average with those tracts that do not have a higher-than-average proportion.

In 2017, according to the King County Metro Transit Strategic Plan Progress Report (Motion 15241), about two-thirds of county residents (64 percent) lived within a quarter-mile of a bus stop. That number was 65 percent for residents of minority census tracts and 71 percent for residents of low-income census tracts. In 2017, about half of all county residents lived within a half-mile of a stop with frequent bus service – a significant increase over 2015, as more service had been added in Seattle and South King County. In addition, more than three-quarters (78 percent) of jobs in King County were within a quarter-mile of a bus stop in 2017. Approximately 80 percent of bus stops were wheelchair accessible, as were all of Metro’s buses.

### Vehicle Assignment

Metro’s fleet includes diesel, hybrid, and trolley buses ranging from 30-foot buses to 60-foot articulated buses. As of the end of 2018, the average fleet age was 6.7 years old, down from 10.5 years old in 2015. The average fleet age declined in 2016, 2017, and 2018 as new trolley buses and new 40-foot and 60-foot

hybrid fleets entered service. Vehicle assignment is based on a variety of factors such as ridership, route characteristics, maintenance and operating base capacity, and grouping of similar fleets by location.

Table 13 shows the average age of buses based on the fall 2018 schedule period in relation to the minority route classification. On all days of the week, the vehicles used on minority routes were newer on average than those used on non-minority routes.

**Table 13**  
**Average Assigned Vehicle Age by Minority Classification, Fall 2018**

Minority Classification	Average Assigned Vehicle Age		
	Weekday	Saturday	Sunday
Minority route	6.5	6.2	5.8
Non-minority route	8.5	6.4	6.3
<i>System</i>	7.5	6.3	6.1

Table 14 shows the average age of buses in relation to the low-income route classification. Vehicles on low-income routes had lower average age on weekdays, but slightly higher on weekends.

**Table 14**  
**Average Assigned Vehicle Age by Income Classification, Fall 2018**

Income Classification	Average Assigned Vehicle Age		
	Weekday	Saturday	Sunday
Low-income route	7.0	6.5	6.2
Non-low-income route	8.1	6.0	5.9
<i>System</i>	7.5	6.3	6.1

## Distribution of Transit Amenities

### Stops

Metro provides a variety of amenities at bus stops. Our Service Guidelines set standards for bus stop spacing and bus shelters, noting that bus stops should be spaced to balance the benefit of increased access to a route against the delay that an additional stop would create for all other riders. Bus stop spacing guidelines are listed in Table 15, below. These guidelines exclude segments of a route where riders cannot access service, such as on limited-access roads or freeways.

**Table 15**  
**Bus Stop Spacing Guidelines (Service Guidelines)**

Service	Average Stop Spacing
RapidRide	½ mile
All other services	¼ mile

### Bus Shelters

The Service Guidelines also note that bus stop amenities should be installed based on ridership in order to benefit the largest number of riders. Bus stop amenities include such things as bus shelters, seating, waste receptacles, lighting, information signs, maps, and schedules. Special consideration is given to areas where high numbers of transfers are expected, where waiting times for riders may be longer, or where

stops are close to facilities such as schools, medical centers, or senior centers. Other considerations include the physical constraints of bus sites, preferences of adjacent property owners, and construction costs. Thresholds for shelters are shown in Table 16.

**Table 16  
Amenity Thresholds for Bus Shelters (Service Guidelines)**

Type of Route	Weekday Boardings	Level of Amenity
RapidRide*	150+	Station
RapidRide*	50-149	Enhanced stop
RapidRide*	Less than 50	Standard stop
Regular Route in City of Seattle	50	Standard shelter and bench
Regular Route outside Seattle	25	Standard shelter and bench

\*For RapidRide, stations have shelters, benches, real-time bus arrival signs and ORCA readers; enhanced stops have small shelters and benches; standard stops have blade markers.

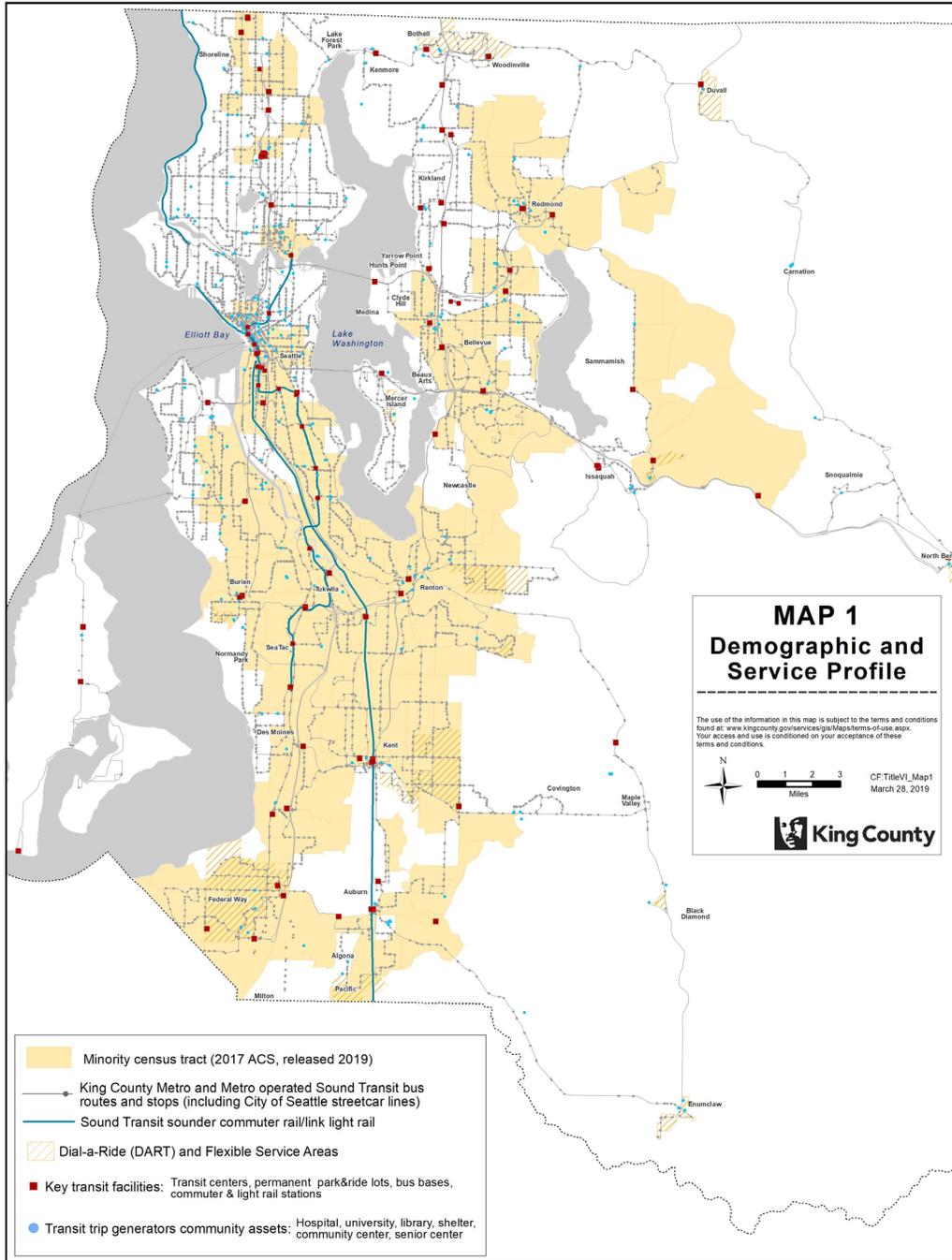
The distribution of transit amenities by income and minority classification is summarized in Table 17. In all cases, census tracts classified as low-income or minority have higher percentages of an amenity or are within three percentage points of census tracts classified as non-low-income or non-minority.

**Table 17  
Passenger Amenities at Bus Stops in Low-Income and Minority Tracts, Fall 2018**

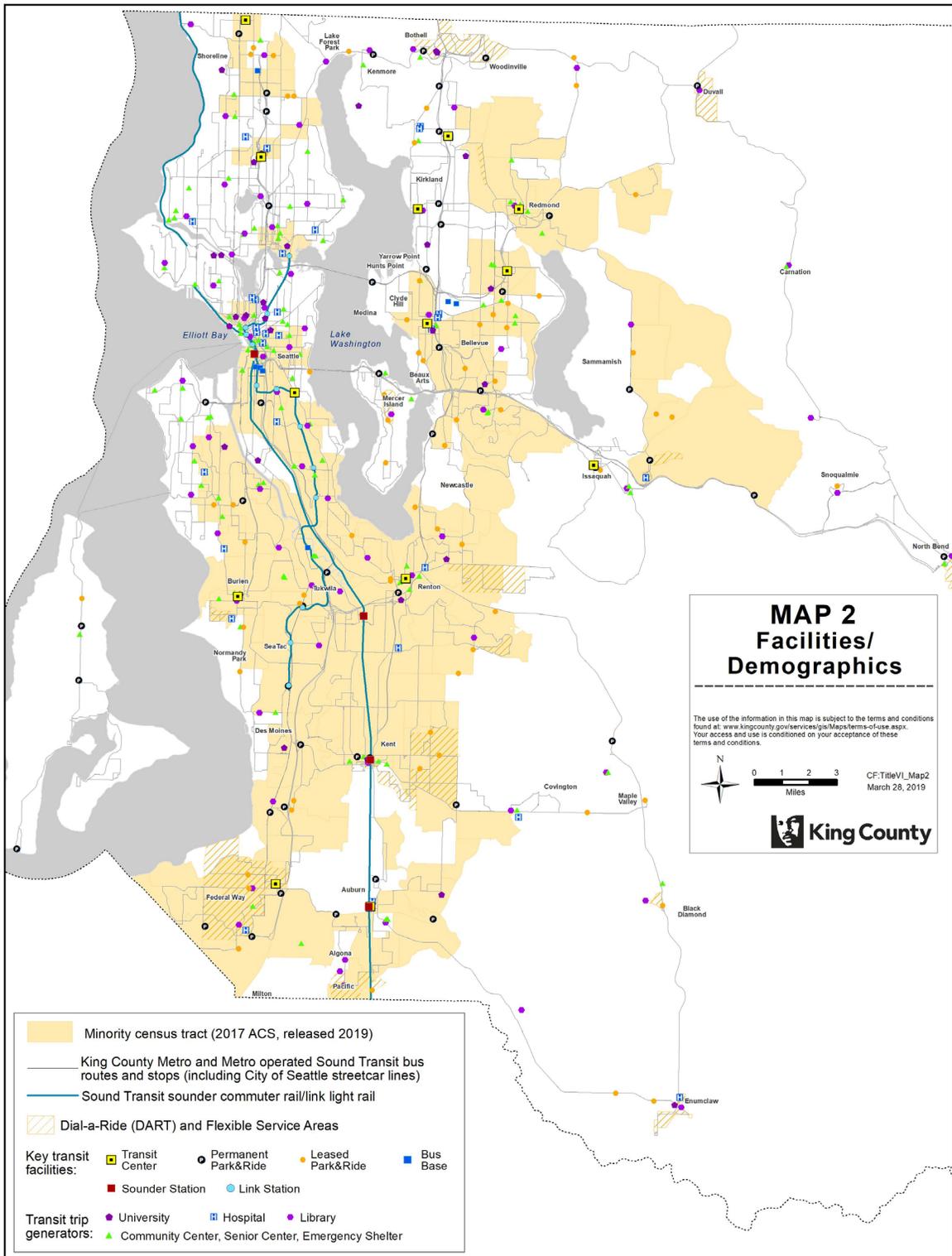
Amenity	Low Income	Non-Low Income	Minority	Non-Minority	All Zones
% Wheelchair accessible	85%	81%	84%	82%	<b>83%</b>
% With benches	8%	10%	8%	10%	<b>9%</b>
% With information signs	4%	2%	3%	2%	<b>3%</b>
% With schedule holders	39%	36%	37%	39%	<b>38%</b>
% With real-time information	1%	1%	1%	1%	<b>1%</b>
% With shelters	28%	19%	26%	21%	<b>23%</b>
% With lighting	16%	11%	16%	11%	<b>14%</b>
<b>Number of Zones</b>	<b>3,467</b>	<b>4,017</b>	<b>3,683</b>	<b>3,801</b>	<b>7,484</b>

# Demographics and Service Profile Maps and Charts

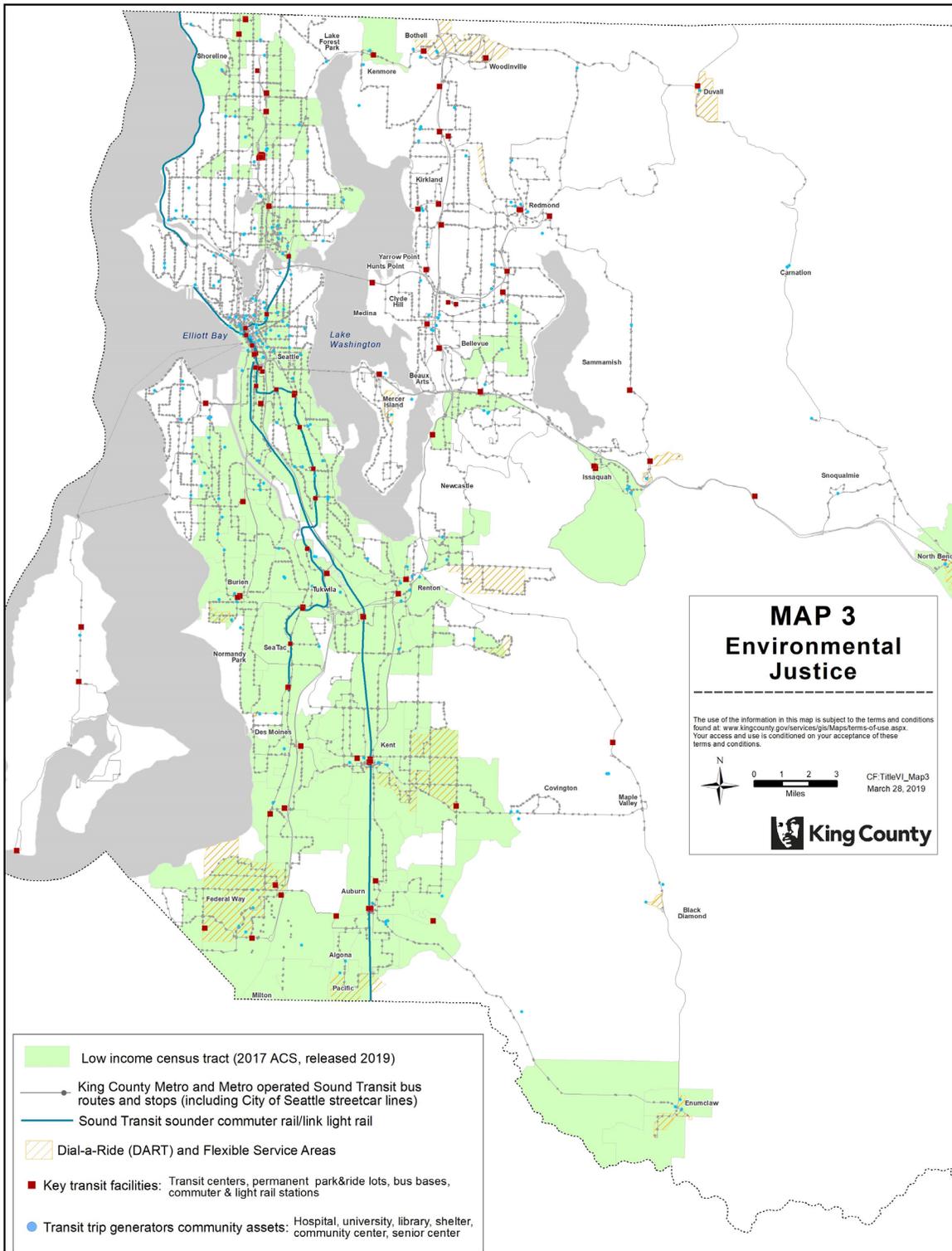
Map 1 is the base map showing minority census tracts based on 2017 American Community Survey data, which was released in 2019. Metro routes are shown along with bus stops and key transit facilities. Sound Transit and Seattle Streetcar routes operated by Metro and are also shown so that the map shows a complete picture of service provided.



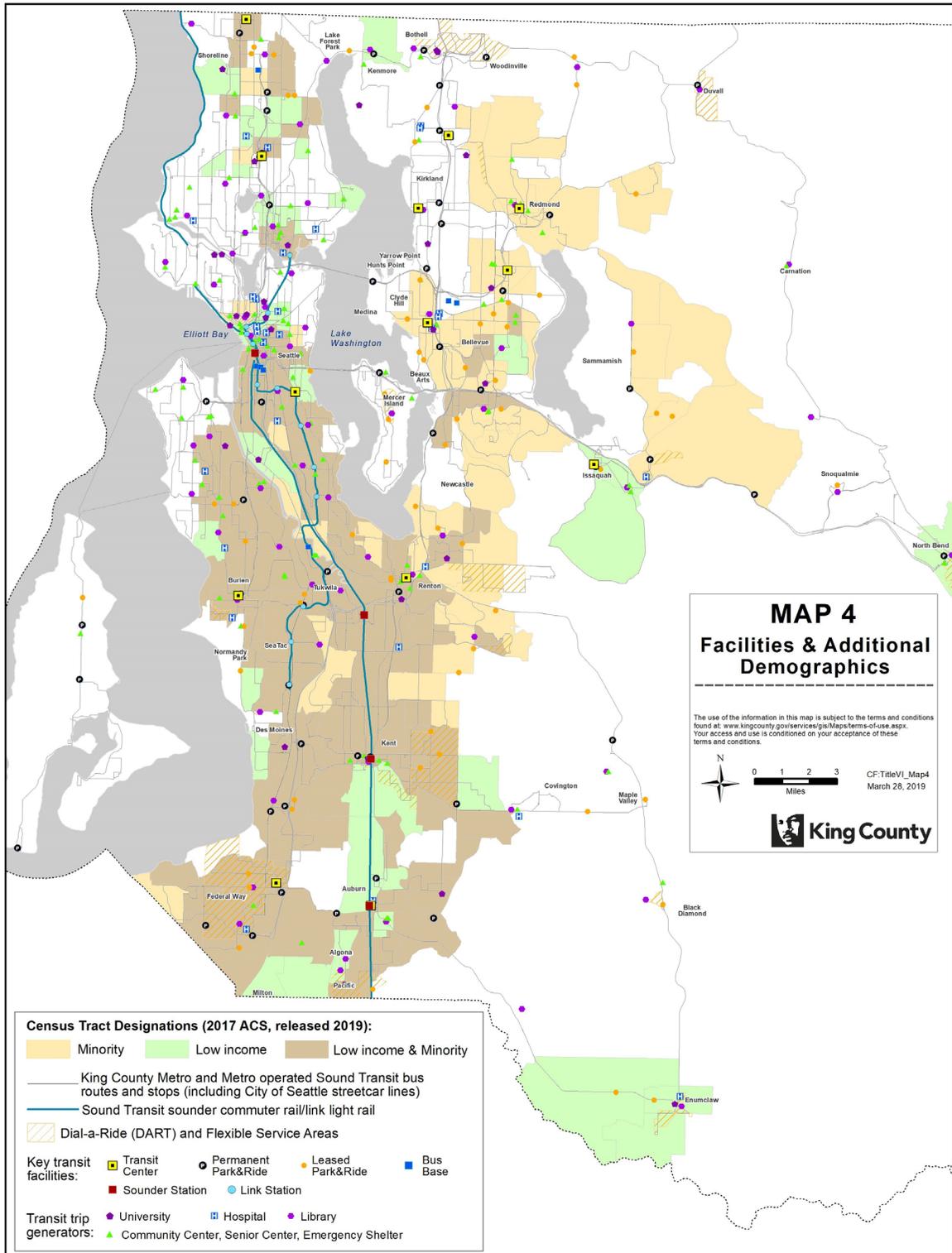
Map 2 shows both demographics and facilities. The facilities include bus bases, transit centers, Sounder and Link stations, and park-and-ride facilities. Major generators of transit ridership are also included. Bus stops are omitted from this map so the other facilities are visible.



Map 3 shows transit routes and facilities as well as low-income census tracts (those in which the percentage of people living in poverty is greater than the county average percentage). This map includes all Metro-operated routes, service stops, and facilities.



Map 4 shows the overlap between minority and low-income areas. Metro facilities and routes operated by Metro as well as minority and low-income census tracts are shown.



# Demographic Ridership and Travel Patterns Collected by Surveys

King County and Metro conduct several types of customer surveys.

With a few exceptions over the past 25 years, Metro has conducted an annual telephone survey of residents in King County to measure market share, gather information on special topics, transit usage, customer satisfaction, gauge ridership barriers and identify demographic and commute characteristics of riders and non-riders.

In 2018 we began surveying residents on an ongoing basis using address-based sampling. Respondents can participate online or by telephone. The survey is available in English, Spanish, Mandarin, Cantonese, Vietnamese, and Somali.

Table 18 summarizes responses from 2018. As the survey responses show, minority riders are more likely to use public transit for most or all of their transportation needs (44 percent of minority riders, compared with 26 percent of non-minority riders), are about equally likely to use transit to/from work (53 percent minority, compared with 54 percent non-minority), and are more likely to use transit for shopping/errands (28 percent compared with 22 percent), medical appointments (20 percent compared with 14 percent), to/from school (12 percent compared with five percent), and for all trips (nine percent compared with four percent).

**Table 18**  
**Comparison of Minority to Non-minority Responses**  
**2018 Rider/Non Rider Survey**  
*For those that use transit*

Question	All Riders 1,220n	Minority 401n	Non-Minority 763n
<b>Number of one-way trips in the last 30 days</b>			
1 to 10	53%	50%	55%
11 to 20	13%	16%	12%
21 to 30	9%	10%	9%
31 to 40	14%	14%	14%
41 to 50	7%	6%	7%
51 to 60	2%	2%	2%
61+	2%	2%	2%
<b>To what extent do you use the bus or streetcar to get around?</b>			
Very little of your transportation needs	24%	21%	25%
Some of your transportation needs	44%	34%	48%
Most of your transportation needs	25%	31%	22%
All of your transportation needs	7%	13%	4%
Don't know	0%	1%	0%
<b>Primary trip purpose when using transit</b>			
To/from work	53%	53%	54%
Shopping/Errands	23%	28%	22%

<b>Question</b>	<b>All Riders 1,220n</b>	<b>Minority 401n</b>	<b>Non- Minority 763n</b>
Fun/Recreation/Social	28%	22%	32%
Medical appointments	16%	20%	14%
Special events	12%	10%	14%
Get to airport	10%	10%	11%
To/from school	7%	12%	5%
Business appointments	7%	6%	8%
To/from volunteering	5%	5%	5%
Church	2%	4%	1%
Social Services	1%	2%	1%
Jury duty	2%	2%	3%
Other appointments	1%	2%	2%
Judicial services/court	1%	1%	1%
Childcare	0%	0%	0%
Other	2%	2%	2%
Use for all trips	6%	9%	4%
No single primary purpose	5%	6%	4%

As Table 19 shows, despite significant differences in their degree of reliance on Metro and some subtle differences in their reasons for riding, both minority and non-minority riders have virtually identical ratings of Metro in terms of overall satisfaction.

**Table 19**  
**Satisfaction with Metro Transit**  
*For those that use transit*

<b>Satisfaction with Metro</b>	<b>All Riders 1,220n</b>	<b>Minority 401n</b>	<b>Non- Minority 763n</b>
Very satisfied	28%	28%	28%
Somewhat satisfied	61%	61%	61%
Somewhat dissatisfied	8%	7%	8%
Very dissatisfied	2%	2%	2%
No opinion	0%	1%	0%
<b>Total satisfied</b>	<b>89%</b>	<b>90%</b>	<b>90%</b>
<b>Total dissatisfied</b>	<b>10%</b>	<b>9%</b>	<b>10%</b>

Metro also conducts rider satisfaction surveys following major changes in service, and for proposals for new types of service. These rider satisfaction surveys include demographic information and are translated into multiple languages as appropriate for the communities served. During 2018, for example, Metro undertook surveys of rider satisfaction with the RapidRide E and F lines, the King County water taxi, and the potential concept of video monitors in bus entrances.

## Public Engagement Process for Setting the Major Service Change, Disparate Impact, and Disproportionate Burden Policies

Metro's Service Guidelines, which were last updated in 2016, contain King County's policies concerning major service changes, disparate impact, and disproportionate burden. Metro developed these policies and submitted them to the King County Executive, who reviewed them and transmitted them to the King County Council for consideration and action. The Regional Transit Committee and the Council's Transportation, Economy and Environment Committee reviewed the legislation and forwarded it to the full Council. The County Council followed a public notification and participation process, held a public hearing, and then adopted the Service Guidelines via Ordinance 18301. The Service Guidelines can be found in Appendix E.

## Service and Fare Equity Analyses

The following is a summary of the service and fare equity analyses Metro conducted for service or fare/fee changes implemented between July 2016 and June 2019. These include service changes that were implemented in September 2016, March 2017, September 2017, March 2018, September 2018, and March 2019; as well as a fare simplification that was implemented in July 2018; and a new parking fee, for which King County Council authorization was granted in November 2018, and which is planned for implementation during summer 2019.

Copies of the Title VI equity analyses,<sup>6</sup> along with Council minutes showing adoption of each of these actions, can be found in Appendix F to this report. Public participation reports for each action can be found in Appendix B.

### Service changes

The King County Council approved service changes for September 2016, March 2017, September 2017, March 2018, September 2018, and March 2019. Summary information about the service changes is shown in Table 20 below. The table identifies each service change and shows the primary affected areas and routes, the date on which the King County Council approved it, and the ordinance number.

The Council minutes recording approval of the service change ordinances are located in Appendix F, along with the Title VI equity analyses prepared for each service change. The ordinance numbers listed in Table 20 enable the reader to find the corresponding minutes. Because the equity analyses include descriptions of the service changes, and also because the ordinances can be lengthy, the ordinances are not included in Appendix F. Metro will provide them upon request, or they can be downloaded (using the ordinance number) from the King County Council's legislative archives:

[https://kingcounty.gov/council/clerk/search\\_archive.aspx](https://kingcounty.gov/council/clerk/search_archive.aspx).

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<sup>6</sup> For the proposed parking fee increase, Metro completed an Equity Impact Review in preparation for Council review of the concept. That Equity Impact Review is included in Appendix F. Within the context of the public rulemaking process for the parking fee, Metro is in the process of completing a Title VI analysis using the pricing put forth in the public rule. That Title VI analysis has not yet been completed as of the writing of this program report.

**Table 20**  
**Summary of Adopted Service Changes, July 2016-June 2019**

Service Change	Date of Council Action	Ordinance Number	Areas Affected	Routes Affected
September 2016	May 16, 2016	18290	Seattle (Southeast)	9X, 38, 106, 107, 124
			East King County	243
March 2017	September 6, 2016	18353	South King County (Renton, Maple Valley, Black Diamond, Enumclaw)	907
September 2017	March 27, 2017	18482	Seattle	82, 83, 84
			South King County (Kent, Renton)	169
			East King County (Issaquah, Sammamish, Redmond)	269
March 2018	October 9, 2017	18579	Seattle (Northeast)	74
			Seattle (Downtown, International District)	99
			South King County (Kent, Renton, Federal Way)	102, 153, 183
			East King County (Redmond)	930
September 2018	March 19, 2018	18685	I-90/Rainier Freeway Station closure (Seattle, East King County)	111, 114, 212, 214, 216, 219
			South/East King County (Bellevue, Renton)	240
			North King County, Northeast Seattle	73, 373
March 2019	September 17, 2018	18790	Montlake Freeway Station closure (Seattle, East King County)	252, 255, 257, 268, 311
			East King County (Mercer Island)	201, 204

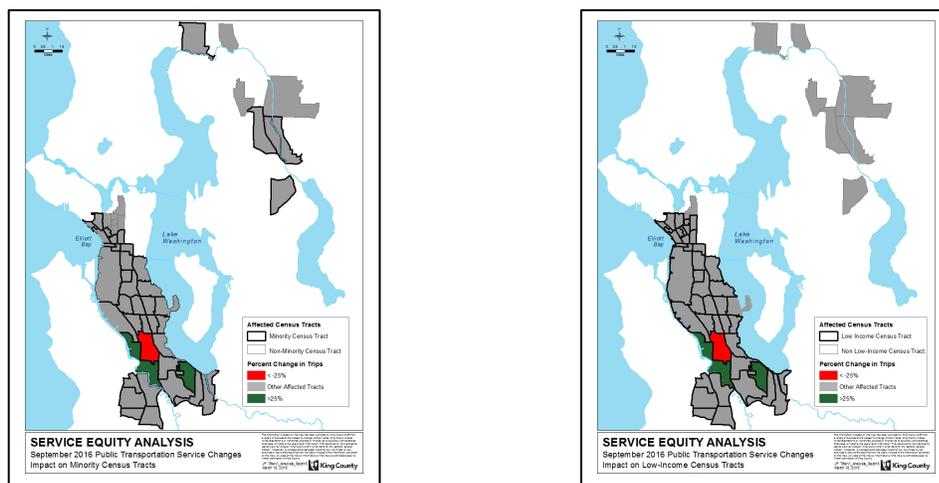
**Disparate impact or disproportionate burden.** An adverse effect of a major service change is defined as a reduction of 25 percent or more of the transit trips serving a census tract, or 25 percent or more of the service hours on a route. Title VI of the Civil Rights Act of 1964 requires all transit agencies to evaluate major service change impacts on minority and low-income populations; the King County Strategic Plan and the County’s Equity and Social Justice ordinance reflect similar commitments to addressing these impacts. A disparate impact occurs when a major service change results in adverse effects that are significantly greater for minority populations than for non-minority populations. Metro’s threshold for determining adverse effects is when the percentage of routes or tracts adversely affected by a major service change and classified as minority is 10 or more percentage points higher than the percentage of routes or tracts classified as minority in the system as a whole. Should Metro find a disparate impact, consideration is given to modifying the proposed changes in order to avoid, minimize or mitigate the disparate impacts of the proposed changes.

The determination as to whether proposed changes would have a disproportionate burden on low-income populations is made by comparing changes in the number of Metro bus trips serving low-income and non-low-income census tracts. A disproportionate burden occurs when a major service change results in adverse effects that are significantly greater for low-income populations than for non-low-income populations. Metro’s threshold for determining adverse effects is when the percentage of routes or tracts adversely affected by a major service change and classified as low-income is 10 or more percentage points higher than the percentage of routes or tracts classified as low-income in the system as a whole.

When evaluating the service changes implemented between 2016 and 2019, in most cases there were no instances of disproportionate burden or disparate impact. In the cases in which Metro identified disproportionate burden or disparate impact, these impacts were addressed as follows:

- **September 2016 service change:** Adverse effects of the service change as proposed were limited to a single census tract, Tract 117, which includes South Beacon Hill and Rainier Beach Station. This tract is classified as minority and low-income. Because the only census tract with adverse effects is classified as a minority and low-income tract, the analysis indicates that there would be a disparate impact on minority populations, with a disproportionate burden on low-income populations. Figure 3 below provides a snapshot of the maps that were prepared to show the adverse effects. These maps can be seen at full size on pages F-21 and F-22 in Appendix F.

**Figure 3**  
**Service Equity Analysis Maps for September 2016 Service Change**



*See pages F-21 and F-22 in Appendix F*

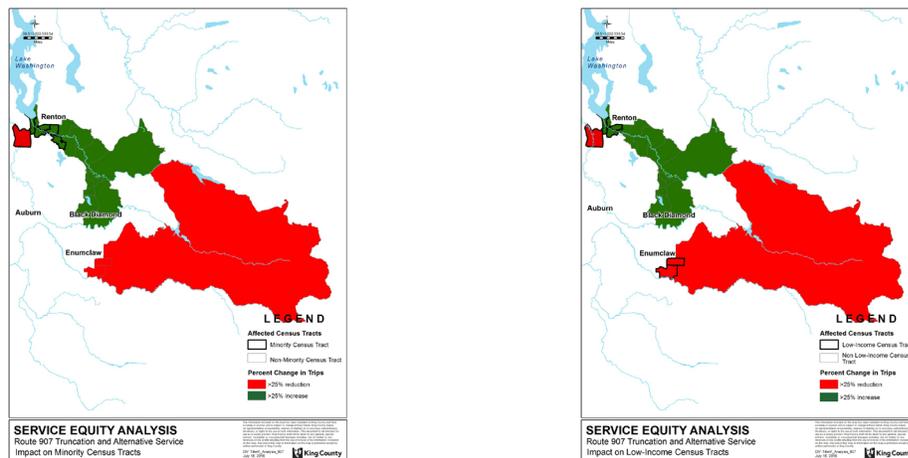
Overall, the proposed changes resulted in an estimated 30 percent reduction in the number of trips per week. However, despite the reduction in the number of trips, the changes provided new bus connections to portions of the International District from Tract 117, as well as more service between Tract 117 and Renton via Skyway. Route 106 was revised to serve this segment of Martin Luther King, Jr. Way South and upgraded to provide about the same amount of service as Route 38. Route 107 was extended to North Beacon Hill to replace service along Beacon Ave S, Carkeek Drive South currently provided by Route 106 and upgraded to provide about the same amount of service as Route 106. So, although the service change resulted in one fewer route serving Census Tract 117, the service change routing revisions and service additions ultimately resulted in about the same amount of service along Beacon Ave S, Carkeek Drive South and Martin Luther King, Jr. Way South.

- **March 2017 Service Change.** Adverse effects of the service change were limited to four census tracts, Tracts 262, 313.02, 314 and 315.02, which include portions of Auburn and Enumclaw. Tract 262 is classified as both a low-income and minority census tract. Tracts 313.02 and 314 are both classified as a low-income tract only. Because tracts 262, 313.02 and 314 with adverse effects are classified as low-income tracts, the analysis indicates a disproportionate burden on low-income populations. While tract 262 is classified as a minority census tract, the analysis does not show a disparate impact because the percentage of minority tracts with adverse effects does not exceed the percentage of minority tracts countywide by greater than 10 percent.

One census tract – Tract 262 in Renton – was identified as being adversely affected due to the proposed elimination of the Route 907 DART area in this tract. While the current service is designed to serve the DART area on up to 14 trips a day, because service in the DART area is provided on a demand-responsive basis only, service may not operate in Tract 262 on days when no demand-response deviation is requested. The proposed changes resulted in more frequent service in the adjacent tract, with proposed frequency on Route 907 increasing from every 90 minutes to every 60 minutes.

Similarly, Tracts 313.02 and 314, classified as low-income tracts, were identified as having adverse effects due to the elimination of the DART area in these tracts, as well as the elimination of the segment of Route 907 that currently serves this area on 14 trips per day. However, a replacement alternative service was proposed that would provide service to this DART area, as well as service between Black Diamond and Enumclaw. Figure 4 below provides a snapshot of the maps that were prepared to show the adverse effects. These maps can be seen at full size on pages F-57 and F-58 in Appendix F.

**Figure 4**  
**Service Equity Analysis Maps for March 2017 Service Change**



*See pages F-57 and F-58 in Appendix F*

Despite the truncation of Route 907 in Black Diamond, the service change preserved a connection between Black Diamond and Enumclaw, and allowed for service frequency to be improved on Route 907 from every 90 minutes to every 60 minutes. The number of daily trips on weekdays increased from 14 to 18.

Alternative service for riders traveling between Black Diamond and Enumclaw was made available with the new Black Diamond-Enumclaw Demand-Responsive Transportation Service, which provides service in Census Tracts 313.02, 314 and 315.02. Alternative service for riders traveling within Enumclaw was made available on Route 915, which was extended to operate through South Enumclaw. For Tract 262, alternate service for riders in Renton traveling within the DART area was made available on Routes 101, 106, 107,169 and the RapidRide F Line, connecting with Route 907 at the Renton Transit Center.

## Fare/Fee changes

**Fare Simplification.** Metro’s only fare change during the time period covered by this report was the implementation of a new adult fare structure with a \$2.75 flat fare, regardless of trip time or whether a trip crosses a geographic zone boundary. This new fare structure was approved by the King County Council in November 2017 (Ordinance 18608) and took effect in July 2018.

The goal of the fare simplification was to make fares easier to understand and pay, reduce travel time by speeding up boarding, and increase access and affordability for some riders. ORCA LIFT (low-income), youth, senior, and disabled fares remained unchanged. Since the new, simplified fare could affect some riders in a negative way, Metro also increased the subsidy provided to human services agencies for bus ticket purchases from \$3.6 million to \$4 million a year, eliminated the \$3 ORCA pass fee for Regional Reduced Fare Permits (available to seniors over age 65 and people with disabilities), and has been working to develop a new income-based fare program, which will be implemented in 2020.

**Methodology.** To determine whether a proposed fare change would have a discriminatory impact on the basis of race, color or national origin, Metro first determines if the proposal would change the fare structure or would change fares by fare payment method. If the proposal involves an equal fare increase across all adult fare categories and an equal increase across all fare payment methods, then this fare change would not have a disparate impact requiring further analysis. Any proposal that involves a change to the fare structure or to relative fares by fare payment method is assessed to determine whether it would have a disparate impact on minority riders or a disproportionate burden on low-income riders.

A fare change that results in a differential percentage change of greater than 10 percent by customer fare category or payment method is evaluated to determine whether it would have a disparate impact on minority riders or a disproportionate burden on low-income riders. For instance, a surcharge on cash fare payment compared to ORCA smart card fare payment of 10 percent or more would be evaluated to determine whether it would have a disparate impact or a disproportionate burden. If the average fare increase for minority riders is five percentage points or more higher than the average fare increase for non-minority riders, then the fare change would be determined to have a disparate impact. Similarly, if the average fare increase for low-income riders is five percentage points or more higher than the average fare increase for non-low-income riders, then the fare change would be determined to have a disproportionate burden.

In the case of the fare simplification proposal, Metro first estimated boardings by full-fare adult riders paying with cash, E-purse, or retail passes, on low-income, non-low-income, minority and non-minority routes. (Boardings made with employer-provided Passport passes were excluded from this analysis, as were boardings by ORCA LIFT (low-income fare), youth and senior/disabled riders since these customers would not be not directly affected by the proposed fare change.) We then calculated and compared the average fare paid by full-fare adult riders on low-income routes with non-low-income routes, and by full-fare adult riders on minority routes with non-minority routes.

Under Metro's previous fare structure, the average fare paid by full-fare adult riders (without employer provided passes) on low-income routes was slightly higher (two cents) than the average full adult fare paid by riders on non-low-income routes. Similarly, the average fare paid by full-fare adult riders on minority routes was somewhat higher (five cents) than the average full adult fare paid by riders on non-minority routes. Metro's proposal to simplify fares by implementing a \$2.75 adult flat fare for all times of day throughout King County was designed, in part, to eliminate these disparities.

The proposal to simplify fares by implementing a \$2.75 adult flat fare for all times of day throughout King County eliminated these disparities, and therefore did not result in disproportionate or disparate impacts.

**Parking Fee.** In November 2018, the County Council passed Ordinance 18837, which gave Metro the ability to establish permit parking fees at Metro-owned parking facilities following the County's public rulemaking procedures. The Council imposed a number of requirements on Metro prior to implementing parking fees. As a result, the fee program has not been implemented as of the writing of this report.

In early 2019, following adoption of the ordinance, Metro issued a rule to establish parking fees at the following rates:

- Single occupancy vehicle: \$60-\$90/month (\$120/month at Northgate Transit Center)
- ORCA LIFT (income-based reduced fare) holder single occupancy vehicle: \$20/month
- High occupancy vehicle: no charge

The rule states that single occupancy vehicle permit fees will be established on a per lot basis depending on factors including local market prices for paid parking, parking utilization along the transit corridor, availability of frequent transit service, and coordination with other public transit service providers that own and operate park and rides.

**Methodology.** Metro completed an Equity Impact Review prior to transmitting the proposed ordinance to the Council and issuing the rule regarding parking fees. To identify and evaluate affected populations, Metro used demographic data to compare each park-and ride lot being considered for inclusion in the proposed program, with demographics across the county as a whole. The analysis determined that the proposed program would not disproportionately affect communities of color, low-income communities, or LEP communities.

To evaluate how regressive fees associated with the proposed program would be, Metro defined a threshold for excessive cost burden (10 percent or more of a person's income when also considering the transit fare), and evaluated several different pricing alternatives against this threshold. Under the most regressive pricing alternative that was evaluated, Metro found that 3.1 percent of county residents would experience an excessive cost burden. Under the pricing alternative for single occupancy vehicles in the rule that was issued, 1.5 percent of county residents would experience an excessive cost burden. To mitigate these potential impacts and support equitable outcomes, the rule also included a discounted permit fee for ORCA LIFT participants (\$20/month compared with \$90/month). In addition, Metro has undertaken intensive and targeted outreach efforts in the communities around parking facilities with high proportions of minority or LEP populations. The Equity Impact Review can be found in Appendix F, and the participation plan is in Appendix B.

Within the context of the public rulemaking process for the parking fee, Metro is in the process of completing a Title VI analysis using the pricing put forth in the public rule. That Title VI analysis has not yet been completed as of the writing of this program report.