



KING COUNTY

1200 King County Courthouse
516 Third Avenue
Seattle, WA 98104

Signature Report

Motion 16179

Proposed No. 2022-0237.1

Sponsors Dembowski

1 A MOTION relating to public transportation, approving the
2 2022 King County Metro Transit Title VI Program Report.

3 WHEREAS, Federal Transit Administration ("FTA") regulations in 49 C.F.R.
4 Section 21.9(b), require all direct and primary recipients of FTA funds to submit a Title
5 VI program report every three years to the FTA regional office, and

6 WHEREAS, updated regulations in Circular FTA C 4702.1B require that "the
7 Title VI program be approved by a recipient's board of directors or appropriate governing
8 entity or official or officials responsible for policy decisions prior to submission to the
9 FTA," and

10 WHEREAS, the King County Metro transit department, as a transit provider and
11 direct recipient of FTA funds, developed the 2022 Title VI Program Report in
12 compliance with applicable federal regulations;

13 NOW, THEREFORE, BE IT MOVED by the Council of King County:

14 The county hereby approves the 2022 King County Metro Transit Title VI
15 Program Report, which is Attachment A to this motion. The council requests the
16 executive to transmit a copy of Attachment A to this motion, with a copy of the final,

Motion 16179

- 17 signed Signature Report of this motion attached as Appendix H, to the Federal Transit
18 Administration.

Motion 16179 was introduced on 6/21/2022 and passed by the Metropolitan King County Council on 7/26/2022, by the following vote:

Yes: 9 - Balducci, Dembowski, Dunn, Kohl-Welles, Perry, McDermott, Upthegrove, von Reichbauer and Zahilay

KING COUNTY COUNCIL
KING COUNTY, WASHINGTON

DocuSigned by:

Claudia Balducci

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Claudia Balducci, Chair

ATTEST:

DocuSigned by:

Melani Pedroza

8DE1BB375AD3422...

Melani Pedroza, Clerk of the Council

Attachments: A. 2022 King County Metro Transit Title VI Program Report

2022 King County Metro Transit Title VI Program Report

July 2019–June 2022 Report to the Federal Transit Administration
in Accordance with FTA Circular 4702.1B, *Title VI Program Guidelines for
Federal Transit Administration Recipients*

June 2022



Metro Transit Department
Office of the General Manager
201 S Jackson St
Seattle, WA 98104

Contact: Chris Bhang, cbhang@kingcounty.gov

Alternative Formats Available

206-263-5277 TTY Relay: 71

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¹ From King County Council meetings when adopted

II. Introduction

King County Metro Transit (Metro) prepared this report on Metro's 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 2019 through June 2022. 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, 2022, 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 to be included in the Title VI program. In general, this report is organized in the order of that checklist.

A. 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. Before the COVID-19 pandemic, Metro delivered 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.

Even at the peak of the pandemic, Metro still delivered more than 100,000 trips per day, highlighting the importance of Metro's service for essential workers and others without other transportation options. Ridership stayed the highest in areas of King County with higher percentages of people who identify as minorities or low-income.

Metro reasserted its commitment to equity through several policy efforts between July 2019 and June 2022. In 2019, Metro co-created a Mobility Framework² (guiding principles and recommendations for centering equity in Metro's planning and operations) with the Metro Mobility Equity Cabinet (23 leaders representing people countywide who are Black, Indigenous, or of color, people with low or no-incomes,

² Mobility Framework [\[LINK\]](#)

linguistically diverse people, immigrants and refugees, and people with disabilities). The King County Council approved³ the Mobility Framework Summary of Recommendations⁴ in March 2020. Then, as directed in the Mobility Framework, Metro engaged with its Equity Cabinet, elected officials, and other interested parties to update its guiding policies⁵ (Strategic Plan for Public Transportation, Metro Connects' long-range plan, and Service Guidelines) to align with the Mobility Framework, including an emphasis on advancing equity. Metro's Strategic Plan identifies equity as a core value and driver of Metro's work, with the updated plan committing Metro to "invest upstream and where needs are greatest." The King County Council adopted⁶ those updated policies in December 2021.

Additionally, Metro reasserted its commitment to equity 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, minorities (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.

Note: Consistent with its Strategic Plan for Public Transportation (2021-2031), Metro Connects, and Service Guidelines, when Metro considers social equity, it prioritizes people who are Black, Indigenous, or of color, people with low or no-incomes, linguistically diverse people, immigrants and refugees, and people with disabilities. However, for this report, Metro uses the same terminology as the FTA: minority (instead of or in addition to Black, Indigenous, or people of color), low-income, and limited English-proficiency (instead of linguistically diverse).

B. King County Population Growth and Demographics

King County has grown rapidly for much of the last decade. Between 2015 and 2020, King County gained about 165,000 people and 195,000 jobs (although employment fell in 2020 because of COVID-19). As of the April 2020 census data estimate, King County's population was 2,269,675.

King County's population has also become more diverse⁷. Nearly one quarter of King County residents were born outside the United States (foreign born), more than 10 percent have limited English proficiency, and 39 percent are minorities. From 2009 to 2017, King County gained 95,000 residents who are foreign born, which accounts for 40 percent of the county's total population growth during that period. During the same period, the total number of limited English-speaking residents in King County increased by 26,500, though remained constant at 11 percent of total population during this period.

The percent of the population that identifies as minorities increased from 34 percent in 2010 to 39 percent in 2017. Compared to non-Hispanic White workers, these populations use transit more for work. 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

³ Motion 15618 [\[LINK\]](#)

⁴ Mobility Framework Summary of Recommendations [\[LINK\]](#)

⁵ Metro's guiding policies website [\[LINK\]](#)

⁶ Ordinance 19367 [\[LINK\]](#)

⁷ The demographics described in this section came from Appendix A, "Travel and Population Data, Trends, and Implications," to the Mobility Framework Report [\[LINK\]](#)

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.

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 policies and programs based on ensuring equity and social justice for all residents of the county.

C. 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 to actively promoting equity and social justice in its services.

Equity and Social Justice Ordinance

King County's Equity and Social Justice Ordinance (Ordinance 16948⁸) 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 impacts health, quality of life, and even life expectancy.

King County's Office of Equity and Social Justice⁹ 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 2016-2022¹⁰, 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.

In addition to the Equity and Social Justice Strategic Plan, key policies and 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; and King County's language assistance plan requirements, 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

⁸ Ordinance 16948 [\[LINK\]](#)

⁹ For more information on King County's work on equity and social justice, visit [\[LINK\]](#)

¹⁰ King County Equity and Social Justice Strategic Plan [\[LINK\]](#)

improvements. The goal areas align 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 Metro gets 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 Metro prepares to offer service that connects more neighborhoods with high-capacity transit.

King County Strategic Plan

The King County Strategic Plan¹¹ 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.

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 Plan¹², 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 minorities (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).

¹¹ King County Strategic Plan [[LINK](#)]

¹² King County 2016 Comprehensive Plan [[LINK](#)]

The 2024 update¹³ to the King County Comprehensive Plan has begun. Metro will work with the broader King County team to ensure Metro’s updated policies, including the increased focus on advancing equity, are incorporated as appropriate.

Executive Order on Written Translation Process

King County provides 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 order¹⁴ 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.¹⁵ The executive order provides for the use of alternative forms of language assistance, such as interpretation services, when they are more effective or practical. King County has a “Language and Communications Access Site¹⁶” that provides guidance as it pertains to accessible communications.

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 18665¹⁷), which requires King County and all its contractors to provide free and prompt interpretation and translation services to limited-English-proficient persons. This section of the Code also requires King County agencies and offices to develop language assistance plans¹⁸ 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.

King County Metro Transit Strategic Plan for Public Transportation (2021-2031), Metro Connects (long-range plan), and Service Guidelines

Metro’s Strategic Plan for Public Transportation (2021-2031), Metro Connects (long-range plan), and Service Guidelines assert Metro’s mission, vision, and goals, include Metro’s overarching policies, and guide long-term planning and daily operations. All three documents¹⁹ were updated in 2020-21 with a goal of more strongly emphasizing equity, as directed by the King County Council-adopted Mobility

¹³ More information about the 2024 update to the King County Comprehensive Plan [[LINK](#)]

¹⁴ Written Language Translation Process Executive Order [[LINK](#)]

¹⁵ The tier map of languages is described in more detail in Appendix E.

¹⁶ “Language Access for Limited English-Speaking Populations” site [[LINK](#)]

¹⁷ Ordinance 18665 [[LINK](#)]

¹⁸ The King County Code definition of a language assistance plan is broader from that defined by Title VI because Metro goes beyond the Title VI requirements.

¹⁹ Metro’s Strategic Plan for Public Transportation 2021-2031, Metro Connects, and the Service Guidelines are available on the “Metro’s Policies” portion of Metro’s website [[LINK](#)]

Framework (described in “recent notable achievements”). The King County Council adopted these updated policies via Ordinance 19367²⁰ in December 2021.

Strategic Plan for Public Transportation 2021-2031

Metro’s Strategic Plan for Public Transportation 2021-2031 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. Metro’s Strategic Plan includes goals and strategies that promote nondiscrimination and full and fair access to services and participation in decision-making processes. Metro also measures progress towards these outcomes through its web-based Strategic Plan dashboard, highlighting differences for priority populations²¹ compared to all riders when applicable. Some examples of the most relevant strategies are in Table 1. A table with the complete goals, objectives, outcomes, strategies, and performance measures is Appendix A, “Summary Table from Strategic Plan Executive Summary.”

²⁰ Ordinance 19367 [[LINK](#)]

²¹ As mentioned previously, when considering how to advance equity, Metro considers five “priority populations”: people who are Black, Indigenous, or of color, people with low or no-incomes, linguistically diverse people, immigrants and refugees, and people with disabilities.

Table 1: Relevant Guidance from Metro's Strategic Plan for Public Transportation (2021-2031)

Goal	Objective	Outcome	Strategies
Invest upstream and where needs are greatest	Invest in and measure the outcomes of services, programs, and improvements in geographic areas, at times of day, and within priority populations where there are unmet needs. Lead with racial justice.	Priority populations have greater access to mobility products and services and use them to meet their needs.	<p>To support access to mobility, use a targeted universalism approach and lead with racial justice, prioritizing services, programs, policies, and products that tailored to the needs of priority populations.</p> <p>Regularly evaluate the unmet needs of priority populations and how populations shift across King County.</p> <p>Continue complying with all legal requirements related to serving priority populations.</p> <p>Prioritize service in geographic areas that have highly dense, transit-supportive development; a high proportion of priority populations; and limited midday and evening service.</p>
	Create and promote products, services, programs, and partnerships that are accessible and easy to use and understand.	Metro better serves customers by reducing barriers to mobility.	<p>Engage with communities to understand barriers to transit ridership.</p> <p>Develop, evaluate, and adjust products, services, and programs that address barriers and increase mobility, especially among priority populations.</p>
Address the climate crisis and environmental justice.	Partner with communities to prepare for the impacts of climate change and support resilience in disproportionately affected communities.	Metro's efforts help King County communities become more resilient to climate change impacts.	Consider and reduce climate justice impacts of Metro's actions on communities disproportionately affected by climate change.

<p>Keep passengers, employees, and communities safe</p>	<p>Coordinate safety and enforcement programs in ways that are equitable, culturally appropriate, and focused on the customer experience.</p>	<p>Community members perceive and experience safety, security, and fare enforcement as fair and equitable.</p> <p>Metro’s systems of safety and enforcement are anti-racist and produce equitable outcomes.</p>	<p>Partner to reimagine Metro’s approach to transit police, security functions, and fare enforcement to center equity, the customer experience, and safety.</p> <p>With the community, co-create a universal definition of safety with targeted approaches to create safety for priority populations.</p>
<p>Improve access to mobility options</p>	<p>Support access to mobility in public spaces and with private partners.</p>	<p>Riders, especially priority populations, including people with disabilities, have sustained and easy access to mobility services through multiple modes and throughout the day.</p>	<p>Develop station area guidelines that prioritize passenger access and support access for people with disabilities and discourage single-occupant vehicle access at transit stops and stations.</p>
	<p>Increase awareness, use, and accessibility of mobility options, emphasizing priority populations.</p>	<p>Community members, especially priority populations, know what mobility services are available and use them.</p>	<p>Increase communications about Metro’s services, products, and programs so that people, especially priority populations, know about and how to use them.</p> <p>Ensure marketing campaigns, signs, wayfinding, and other communications are culturally appropriate, provided in multiple languages and formats, accessible to community members, provided in coordination with community-based organizations, and evaluated and upgraded regularly.</p> <p>Employ an income-based approach to Metro’s fare structure, ensuring discounts are provided to those who cannot afford to pay full fare.</p>
	<p>Provide equitable access to parking and other assets that connect people to transit.</p>	<p>Parking and other assets that connect people to transit are provided and managed equitably.</p>	<p>Actively manage parking to maximize capacity for transit riders and ensure equitable access for priority populations and off-peak travelers.</p>

<p>Provide fast, reliable, and integrated mobility services.</p>	<p>Grow a regional, innovative, and integrated mobility network of traditional and new mobility services that is safe, equitable, and sustainable.</p>		<p>Deliver mobility services that connect people to jobs and job centers, opportunities, and activities of daily living. Improve service during non-peak periods.</p>
<p>Build a skilled, diverse, and well-supported workforce that has growth opportunities.</p>	<p>Recruit and hire from populations facing the greatest barriers to transit employment.</p>	<p>Metro employees represent the diversity of King County’s population.</p>	<p>Use targeted approaches and partnerships to recruit priority populations for Metro jobs.</p> <p>Leverage and partner with other King County departments and programs to hire employees from diverse backgrounds.</p>
<p>Conduct deliberate and transparent community engagement.</p>	<p>Be open to shared decision-making and co-creation with community.</p>	<p>Metro shares power with communities, especially priority populations, and co-creates policies, services, programs, and products.</p>	<p>Seek opportunities for co-creation and upstream engagement.</p> <p>Engage with communities that have the greatest needs.</p> <p>Continue commitment to partner with and compensate community-based organizations to mutually build each other’s capacity in engagement efforts.</p> <p>Value qualitative information, such as community feedback, in addition to quantitative data.</p>
	<p>Use community-driven approaches to develop, program, and evaluate mobility services and infrastructure that serve priority populations.</p>	<p>Community members, especially priority populations, perceive that Metro’s engagement practices are meaningful, inclusive, transparent, and geared toward long-term trust and relationship building.</p>	<p>Take a long-term approach to engagement, rather than a project-by-project approach.</p> <p>Use best practices for making engagement inclusive, accessible, and community driven.</p>

Service Guidelines

Metro uses the Service Guidelines²² to evaluate, design, and modify transit services to meet changing needs and deliver efficient, high-quality service. The 2021 updates to the Service Guidelines help Metro consider equity more strongly in its service planning in several ways.

These guidelines define the process for how Metro annually reviews and makes changes to the transit system. Services included in the Service Guidelines are fixed-route bus service, flexible services, and marine service. They address three topics:

- Evaluating service performance
- Adding, reducing, or restructuring performance
- Planning and developing service

The performance evaluation and service needs are published in an annual System Evaluation Report that is transmitted to the King County Council. The results of the System Evaluation Report are used in planning service changes twice annually.

For fixed-route service, the guidelines establish target service levels for transit corridors and the process for adding, reducing, or restructuring service. Adding service is based on multiple priorities, in this order: addressing crowding (first), improving reliability (second), growing service (third). Target service levels for each route are based on the higher of either the service levels envisioned in the Metro Connects interim network or the service guidelines growth methodology, which uses the factors of land use, equity, and geographic value.

Both the 2021 adopted Service Guidelines, and the original 2015 version of the Service Guidelines (which were adopted policy through much of 2019 and 2022, the duration of this report) are included in Appendix B, “Metro’s Service Guidelines.”

Metro Connects

Metro’s long-range plan, Metro Connects²³, defines an aspirational vision for more than a 70 percent increase in bus service hours by 2050 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 minorities and low-income people than the general population. Specifically, Metro Connects envisions a transit system in which, by 2050, 84 percent of minorities and 86 percent of low-income people within King County live near frequent transit service. 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 criterion for the selection of candidate RapidRide (bus rapid transit) lines. As part of the 2021 update, Metro conducted an equity gap analysis on the interim service network and made targeted adjustments to address some of the gaps identified.

D. 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 notable programs Metro has implemented over the past few years to promote fair and equal access to Metro’s services

²² The Service Guidelines are available on Metro’s website [\[LINK\]](#)

²³ Metro Connects is available on Metro’s website [\[LINK\]](#)

and activities for all people in Metro’s service area, including minority populations and people who have limited English proficiency or low incomes:

- *Mobility Framework.* In 2018, the King County Council passed Motion 15253²⁴, requiring Metro to work with community to create a “framework for the equitable and sustainable implementation of mobility.” As a result, Metro partnered with the Equity Cabinet, community leaders representing priority populations countywide, to co-create the Mobility Framework, which included guiding principles and recommendations for centering equity and sustainability in Metro’s work. Staff and community members developed these policy recommendations after reviewing travel trend data and best practices to understand how the region’s demographic and movement patterns are changing, and how other agencies are embedding values in their work. The King County Council adopted a summary of the Mobility Framework recommendations via motion 15618²⁵ in March 2020. The framework was a driving force behind the 2021 updates to Metro’s Strategic Plan for Public Transportation, Metro Connects, and the Service Guidelines. The “Mobility Framework Summary of Recommendations” is Appendix C.
- *Equity Cabinet.* In 2019, Metro built on the success of the King County Department of Natural Resources and Parks Open Space Equity Cabinet, which worked to embed an equity-based approach into how the region invests in its open space infrastructure to redress the disparities in access to parks and open spaces. Metro continued the Equity Cabinet, with some of the same and some new members, to identify opportunities to center equity and sustainability in how the region grows, integrates new mobility choices, and invests in its public transit and related infrastructure. The cabinet includes approximately 25 community leaders representing low-income communities, minorities (Black, Indigenous, and communities of color), immigrants and refugees, limited-English speaking people, and people with disabilities. The group convened regularly in 2019 to co-create the Mobility Framework and continued meeting monthly in 2020 and 2021 to discuss and provide feedback on proposed updates to Metro’s policies. In early 2022, the Equity Cabinet recruited new members and revised its work plan. The Cabinet will remain an important group with which Metro engages.
- *Service changes.* The COVID-19 pandemic, which spanned much of the time frame covered by this report, had significant impacts on Metro ridership and transit service. Metro made numerous service reductions, adds, and adjustments throughout 2020 and 2021 to respond to ridership as well as reflect operations and workforce challenges. During the same period, Metro made several major service restructures that had positive impacts on minority, low-income, and LEP populations. For example, Metro designed service changes in the Renton, Kent, Auburn Area Mobility Project (RKAAMP) in partnership with and to provide greater mobility options for minorities and other underserved communities in south King County. The community engagement process took 18 months and Metro engaged a diverse group of riders, including people who spoke English, Somali, Spanish, Arabic, Farsi, and French. Changes were implemented in September 2020. Metro conducted extensive, community-based engagement to design service changes around the Northgate Link Extension. The North Link Connections Mobility Project included partnership with a community-based mobility board, among other actions to ensure that unserved and underserved communities could shape the transit system. Metro has also considered equity when delivering innovative mobility services. For instance, in summer 2021, Metro expanded Via to Transit²⁶ (an on-demand pilot service connecting riders to

²⁴ Motion 15253 [[LINK](#)]

²⁵ Motion 15618 [[LINK](#)]

²⁶ More information about Via to Transit [[LINK](#)]

and from select transit hubs) in Rainier Beach, Skyway, Tukwila, and Renton — all areas of King County with more minority, low-income, and LEP populations.

- *Subsidized annual pass*²⁷. In fall 2020, Metro launched a new subsidized annual pass program, which is available for people with no- and very-low incomes who qualify through select state benefit programs²⁸. Eligible customers receive an annual transit pass that provides them with unlimited access to Metro’s services for up to 12 months. Customers can renew the pass each year, provided eligibility requirements are met. Three other regional transit providers – Sound Transit, Seattle Streetcar, and Seattle Monorail Services – currently participate in the program on a pilot basis. Like ORCA LIFT, the subsidized annual pass is also implemented in partnership with partner agencies who determine eligibility, enroll customers, and distribute cards. Three human service agencies are integral to the success of the program: the Washington State Department of Social & Human Services, King County Department of Public Health, and Catholic Community Services.
- *Subsidized youth fare*. In 2022, the Washington State legislature passed “Move Ahead Washington²⁹” legislation, making substantial funding available for transit agencies if youth ride for free. As of April 2022, Metro is preparing to implement this change, including preparing a Title VI analysis of its impacts.
- *Continued progress on existing reduced fare programs*.

ORCA LIFT: Metro continued providing a \$1.50 fare on buses and flexible services for riders with household income below 200 percent of the federal poverty level through its ORCA LIFT program³⁰, which aims to make transit more affordable and accessible to individuals with low incomes. Metro’s partnerships with King County’s Department of Public Health and human service agencies who enroll customers in ORCA LIFT as they are enrolling in other benefit programs are key to ORCA LIFT’s success. Metro’s funding for enrollment supports two Public Health locations for in-person enrollments, outreach events, and staff members to coordinate events and work with customers in person and by phone. In 2021, Metro launched a new online enrollment option³¹, available in English, Spanish, and Vietnamese. Metro provides printed enrollment and promotional materials in 14 languages to transit agency and enrollment partners and maintains a website³², in English and Spanish, with information about eligibility and enrollment options. As of the end of 2021, there were 40,128 valid ORCA LIFT cards. Of ORCA LIFT cards issued during the fourth quarter of 2021, 18 percent were issued to Black or African American riders (who make up about 7 percent of the overall county population) and 20 percent were issued to people using a language other than English (compared with an estimated 10.7

²⁷ Unlike ORCA LIFT, the subsidized annual pass is not an income-based fare. Instead, it is a subsidy program, where Metro purchases transit passes for people who qualify, enrolls them the program, distributes transit passes to them on ORCA cards, and manages their cards in the ORCA system. As such, Metro was not required to do a complete Title VI analysis. Metro did note how the pilot program is in line with King County’s Equity and Social Justice Strategic Plan.

²⁸ Temporary Assistance for Needy Families (TANF)/State Family Assistance (SFA), Refugee Cash Assistance (RCA), Aged, Blind, or Disabled Cash Assistance (ABD), Pregnant Women’s Assistance (PWA), Supplement Security Income (SSI), Housing and Essential Needs (HEN).

²⁹ More information about “Move Ahead Washington” [[LINK](#)]

³⁰ Currently, six other regional transit agencies accept the ORCA LIFT fare. Metro is responsible for program administration and card distribution on behalf of these regional transit partners.

³¹ Online enrollment option [[LINK](#)]

³² ORCA LIFT website [[LINK](#)]

percent of the county population with limited English proficiency). Top languages were Spanish (5.2 percent), Chinese (4.5 percent), Dari (2.8 percent) and Tigrinya (0.6 percent).

Provision of tickets to human services agencies. Each year, Metro makes subsidized bus tickets available to eligible human services agencies, who can purchase and distribute them 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 program³³ via King County’s Department of Community and Human Services, which receives funding from Metro to manage the request for proposals and allocation process. During 2021, 165 agencies were selected to participate and distributed more than 983,000 million tickets over the course of the year to people in need (Human Service ticket sales were lower in 2021 due to COVID-19).

- *Safety, Security, and Fare Enforcement (SaFE) Reform Initiative.* In 2020, Metro launched the SaFE initiative³⁴ to create a new vision for Metro’s safety and security functions, and to eliminate disproportionately negative outcomes of safety and security policies and practices on customers and employees, especially for minorities. The King County Executive transmitted the report³⁵ to the King County Council in February 2022. Metro worked with diverse community-based organizations and engaged with roughly 8,000 individuals—including community members, customers, and Metro and Metro Transit Police employees—throughout a year-long, four-phase engagement process. Together, these groups developed a vision of a “safe, accessible, and equitable transit that is co-created to support community well-being,” supported by concepts outlined in the SaFE Report transmitted to the Council. This work is ongoing.
- *Continued language outreach efforts.* At the beginning of the pandemic, Metro established a system and structure to provide language access materials and made COVID-related communications available in 18 languages to create efficiencies. This improved the county’s ability to communicate life-saving public health messaging and ensured Metro’s frequently changing service information was accessible to a linguistically diverse customer base. Metro also continues to work with the county’s Language Equity team and participates in their taskforce to improve content for linguistically diverse communities. Metro is also hiring three positions focused on serving linguistically diverse audiences, including a Language Equity Program Specialist, Community Liaison Pilot Program Specialist, and a Translation Coordinator. The Language Equity Program Specialist will develop Metro’s language equity policy, practices, resourcing, and guidance in service to Metro’s long-range vision and core values. This work will be driven by community feedback and best practices, with a goal of increasing access to transit, supporting participation in Metro’s decision making, and meeting county, state, and federal policy, and direction. This position will represent Metro in countywide language access and equity efforts. The Community Liaison Pilot Program Specialist will engage people from priority populations in Metro’s engagement to inform planning and decision-making around service, programs, and policies. This position will recruit, train, and manage community liaisons who will both advise on and implement feedback gathering methods, tools, and activities to increase and ensure participation in Metro’s engagement processes – both for gathering input from priority populations and to better understand their needs and lived experiences. Finally, the Translation Coordinator will implement a translation enterprise system to advance language equity and access goals across Metro departments and with community. This position will align the county’s language access strategies with Metro’s translation program.

³³ More information about Metro’s Human Services Bus Ticket Program [\[LINK\]](#)

³⁴ More information about the Safety, Security, and Fare Enforcement (SaFE) Reform Initiative [\[LINK\]](#)

³⁵ SaFE report [\[LINK\]](#)

- *Employee Resource Groups:* Employee Resource Groups (ERGs), also known as Affinity Groups, address racism and other forms of oppression to advance the county's equity and social justice goals. Affinity Groups support the advancement of the King County Equity and Social Justice Strategic plan. Metro proudly joins King County in providing opportunities and spaces for employees to come together, share their experiences, and work to advance equity within the workplace and on Metro services. Metro ERGs currently include a Veterans ERG, Women's ERG, LGBTQIA+ ERG, and an Anti-Racist Whites Action Group. ERGs help ensure an inclusive environment where all are valued and empowered to succeed and promote equity and social justice; foster employee engagement; strengthen workplace effectiveness; and enhance personal and professional growth. ERGs will work with leadership to inform policies and procedures that address racism and other forms of oppression. They also help build relationships with colleagues who share common interests or backgrounds and provide opportunities for participants to develop their leadership skills. ERGs embody Metro's foundational principle of equity and deliver on the commitment to invest in Metro's workforce.
- *Equity Champions Network.* The Metro Equity Champions Network is a group of Metro employees who are nominated or self-identify as equity champions that go beyond the status quo to advance racial equity. The network provides an opportunity to collaborate across divisions, share tools and resources to advance racial equity, find alignment, build connection, and support each other's' well-being and sustainability while doing equity work.

This report provides more information about these achievements and 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.

III. SECTION I: General Reporting Requirements

E. Title VI Notice to the Public

Metro uses a variety of means to notify the public that it complies 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 and displayed within the Pass Sales Office. 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 Metro's website³⁶:

"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 notifications are posted in English and Spanish on the King County website³⁷ :

"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

³⁶ Title VI notice on Metro's website [\[LINK\]](#)

³⁷ Title VI notifications on the King County website [\[LINK\]](#)

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"

F. 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 Rights³⁸.

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 on its website³⁹.

In addition, King County Metro has downloadable complaint forms in English and Spanish on its website⁴⁰.

A copy of the English version of the complaint form is in Appendix D.

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 complaint is flagged as related to Title VI and forwarded to the Equal Employment Opportunity office to record the complaint⁴¹. The complaint is then sent to the King County Office of

³⁸ This office is also called the "Civil Rights Program" within the King County Office of Equity and Social Justice.

³⁹ King County Civil Rights Program online complaint form [[LINK](#)]

⁴⁰ Part of Metro's website with downloadable complaint form [[LINK](#)]

⁴¹ A "potential" Title VI complaint is a report, complaint, grievance, etc. that EEO tracks regardless of the merits of the allegations. A "formal" complaint is lodged when the complainant files a signed complaint alleging Title VI violations to the King County Office of Civil Rights (within the King County Office of Equity and Social Justice), per KCC 12.22.040.

Civil Rights since they have the legal jurisdiction⁴² to investigate the claim. The matter is then processed and investigated under KCC 12.22, “Discrimination in Places of Public Accommodation.”

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 processes for receiving, tracking, and investigating Title VI complaints are aligned and fulfill all Title VI requirements.

G. Title VI Investigations, Complaints, and Lawsuits

Four civil rights complaints were filed since Metro’s 2019 Title VI program was submitted. Those complaints have all been closed. The complaint and actions taken are listed in Table 2.

Table 2: King County Office of Civil Rights - Complaints and Actions Taken

Metro/Public Accommodation Complaints				
	Date filed	Summary/Allegations (Include basis of complaint: race, color, or national origin)	Status – February 28, 2022	Action(s) Taken
1.	11-06-19	Public accommodations complaint based on national origin	File closed 11-19-19	Referred to ombuds for complaint against customer service
2.	2-4-20	King County employment complaint based on national origin	File closed 2-12-20	Not ripe
3.	2-17-20	Public accommodations complaint based on race	File closed 2-18-20	Referral to Metro customer service
4.	11-1-20	King County employment complaint based on national origin	File closed 11-2-20	Referral to ombuds because of complaint about Metro not following procedure when it receives customer complaints

H. Public Participation Plan

King County, broadly, and Metro, specifically, have several policies and plans that establish expectations for how Metro engages minority and limited-English-proficient (LEP) populations in 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**⁴³ seeks to ensure that King County government operates efficiently and effectively and is accountable to the public. Specifically, the Strategic Plan

⁴² Per KCC 2.16.035(H) [[LINK](#)]

⁴³ King County Strategic Plan [[LINK](#)]

commits to, “deliver consistent, responsive, equitable, high-quality services to residents, cities, and districts.”

- **Metro’s Strategic Plan for Public Transportation 2021-2031**⁴⁴ includes a goal on public engagement and transparency that states, “Conduct deliberate and transparent community engagement.” Some objectives and strategies within that goal area commit that Metro will:
 - Be open to shared decision-making and co-creation with community (objective).
 - Seek opportunities for co-creation and upstream engagement (strategy).
 - Engage with communities that have the greatest needs (strategy).
 - Use community-driven approaches to develop, program, and evaluate mobility services and infrastructure that serve priority populations (objective).
 - Demonstrate how community input influences decisions (strategy).

Metro’s Strategic Plan commits Metro to working to advance equity, especially for priority populations, and describes equity as one of Metro’s core values (along with safety and sustainability). Metro’s Strategic Plan also includes several objectives, outcomes, and strategies specifically about targeting services to historically underrepresented populations. Strategies include: “To support access to mobility, use a targeted universalism approach and lead with racial justice, prioritizing services, programs, policies, and products that tailored to the needs of priority populations” and “Continue complying with all legal requirements related to serving priority populations.”

- **King County’s Equity and Social Justice (ESJ) Strategic Plan**⁴⁵ makes several 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 and 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 and Budgets goal area, minimum standards)

As noted above, the Transportation and 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 and Mobility)

⁴⁴ Metro’s Strategic Plan for Public Transportation, via Metro’s “Policies” webpage [\[LINK\]](#)

⁴⁵ King County Equity and Social Justice Strategic Plan [\[LINK\]](#)

- **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. 2.15.030⁴⁶) 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 persons with LEP.

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

I. Ongoing Engagement

Transit Advisory Commission. The Transit Advisory Commission (TAC) was established in January 2011 (Ordinance 17025⁴⁷). 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 parties 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 3 displays the current demographic makeup of the Transit Advisory Commission, including the members with disabilities. Consistent with King 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 is available on Metro’s website⁴⁸ in English and Spanish.

The TAC is sometimes invited to brief the County Council or other regional elected officials on transit issues. The TAC designates a member to serve on each of Metro’s Sounding Boards, described below.

⁴⁶ K.C.C. 2.15.030 [[LINK](#)]

⁴⁷ Ordinance 17025 [[LINK](#)]

⁴⁸ More information about Metro’s Transit Advisory Commission [[LINK](#)]

Access Paratransit Advisory Committee. The Access Paratransit Advisory Committee was established in November 2018 (Ordinance 18838⁴⁹). This 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 an annual report for the King County Executive and Council 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 replaced 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.

Mobility Equity Cabinet. Metro recruited members to create the Mobility Equity Cabinet in 2019 to embed an equity and sustainability centered approach to how Metro invests in mobility by co-creating Metro’s Mobility Framework. The group later advised Metro on updating three key policies: Metro’s Strategic Plan for Public Transportation, Metro Connects (long-range plan), and the Service Guidelines.

When first created, the cabinet included 23 community leaders representing low-income communities, minorities (Black, Indigenous, and communities of color), immigrants and refugees, limited-English speaking people, and people with disabilities. The group convened regularly from 2019-2021 to co-create the Mobility Framework and consult on the policy updates. In early 2022, Metro and Cabinet leaders recruited members for the 2022-2023 term with a focus on advising Metro in implementation of policies that center equity and sustainability. Cabinet advisement will continue including how Metro invests in public transit and related infrastructure; integrates new mobility choices; and engages communities in decision-making. The group will remain as an ongoing body that will continue to consult with Metro on the implementation of updated policies.

Table 3: Ongoing Commission, Cabinet, and Committee

	Transit Advisory Comm	Mobility Equity Cabinet	Access Paratransit Advisory Committee
African American	3	9	No data*

⁴⁹ Ordinance 18838 [[LINK](#)]

	Transit Advisory Comm	Mobility Equity Cabinet	Access Paratransit Advisory Committee
Asian-Pacific Islander	0	2	No data*
Caucasian	6	1	2
Hispanic	0	2	No data*
Limited English proficiency	No data	0	No data*
Person with disabilities	7	2	9
Low-income representative	No data	No data	No data

*While specific racial/ethnic identities are not known, five Access Paratransit Advisory Committee members identified as people of color (minorities).

J. Project-Specific Engagement

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

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

- Riders of affected routes, focusing on priority populations
- Residents of areas around affected routes, focusing on priority populations
- Community groups and neighborhood councils
- Organizations that serve underrepresented and transit-dependent populations
- Staff and elected officials from local jurisdictions
- Major institutions (i.e., colleges and universities, or health care)
- Employers
- Partner transit agencies (e.g., Sound Transit)

Metro uses information and input from community members to develop service proposals that respond to the community's expressed needs. Service proposals often include concepts for coverage, frequency, and span of service. Concepts may also present variations for peak and all-day service, local and express service, and other aspects of service.

Metro informs and solicits input from the community through methods such as public meetings, surveys, conversations with community groups, social media, news releases, advertisements, and Mobility Board meetings (see below). Metro involves people early in the planning process, presenting preliminary concepts and gathering input about mobility needs that is then used to develop proposals that are presented in a second round of outreach.

Metro staff research the demographics of those who may be affected by the change being considered in every community engagement project. 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. Metro designs outreach strategies to reach these populations, creatively seeking to engage those who would not otherwise learn about Metro 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, trans-created, 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 for LEP populations that are designed in best formats and set at ideal locations and times.
- 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. Metro returns 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.

Metro has also presented to or partnered with many 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

Ethnic Chamber of Commerce Coalition
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 considering major service changes, Metro often complements broad public engagement with a Sounding Board or Mobility 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 equitably 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. Metro sometimes partners with community-based organizations to recruit potential Sounding Board members.

Summary of Project-Specific Engagement

Metro conducted public engagement processes for three major Link light rail integration service restructures in East, South, and North King County, COVID-related service reduction response and service restorations, Safety, Security and Fare Enforcement (SaFE) Reform, multiple flexible services projects, Income Based Fares, Transit Oriented Development, South Annex Base planning and design, Skyway Mobility community plan implementation, and policy updates.

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 2023 or beyond. Such projects include a Link light rail integration service restructure in North and South King County, restructures for RapidRide implementation, implementation of SaFE Reform recommendations, a mid-range service and capital integration plan, and a customer communications improvement initiative.

Example Projects

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

Project # 1: Renton, Kent Auburn Area Mobility Plan

Metro conducted an extensive, three-phase community engagement process between March 2019 and December 2019. The process included the exploration and identification of needs, opportunities, and gaps in service, as well as an evaluation of possible options to revise, integrate, and connect the cities of Renton, Kent, Auburn, Covington, Algona, Pacific and the surrounding areas.

While the network structure had not changed substantially in over a decade, Renton, Kent, Auburn, Covington, Algona, and Pacific have seen significant demographic changes, increasing density, evolving travel patterns, and continued issues with transit service performance.

South King County has seen dramatic population growth in recent decades. Between 1990 and 2018, Kent, Renton, and Auburn grew by 240 percent, 150 percent, and 147 percent respectively. Covington has increased by 54 percent since 2000 and Pacific grew by 56 percent since 1990. South King County has a disproportionately high concentration of minorities, limited English-speaking populations, and low-income households as well as a disproportionately low number of “quality of life” indicators and equitable outcomes. There is approximately a 10-year gap in life expectancy between areas of South King County and North and East King County.

Metro’s public engagement for this project centered on prioritized populations identified in King County’s Equity & Social Justice Strategic Plan (ESJ), including minorities, people with low or no income, and limited English-speaking populations. Additionally, Metro also prioritized people with disabilities and seniors for this project. Engagement centered on:

- Building partnerships with community-based organizations (CBOs), jurisdictions, and other community-based assets
- Developing processes for decision-making that involve and center historically marginalized populations, such as people with low or no income, students, youth, seniors, minorities, people with disabilities, limited English-speaking populations and others with limited transportation options
- Compensation for Mobility Board members who gave their time, talent, and effort throughout the process.

Engagement Methods Deployed

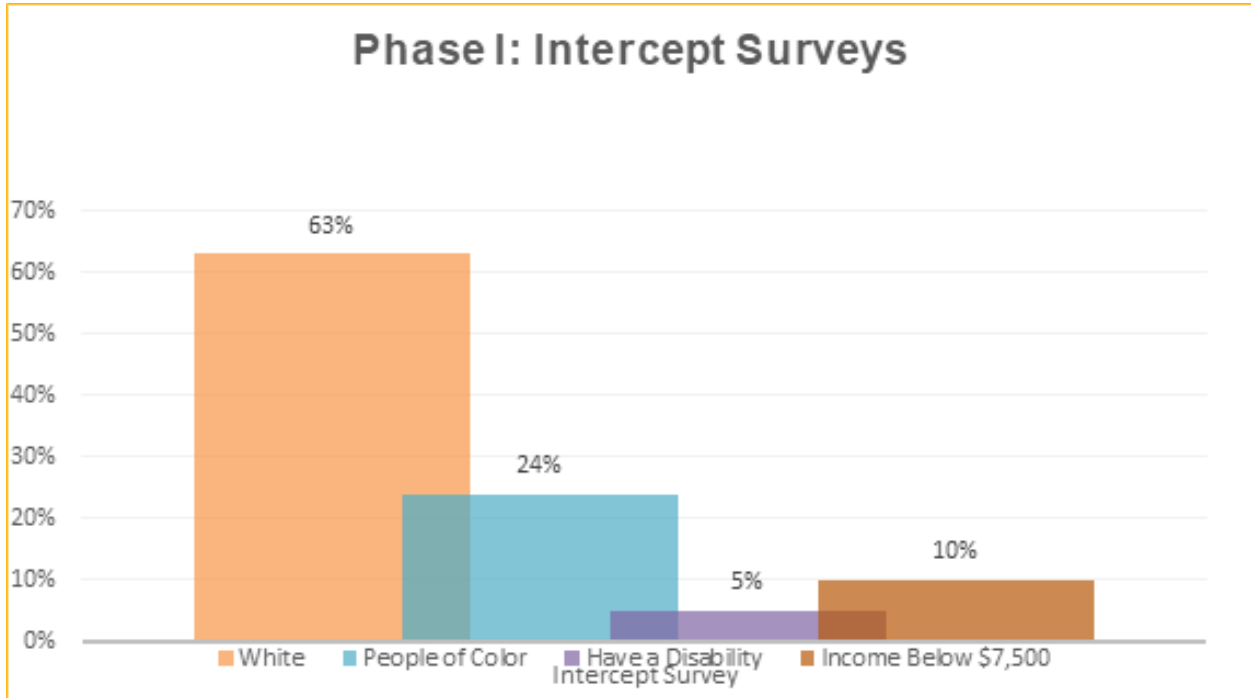
Table 4 illustrates engagement methods used in this service restructure.

Table 4: RKAAMP Engagement methods

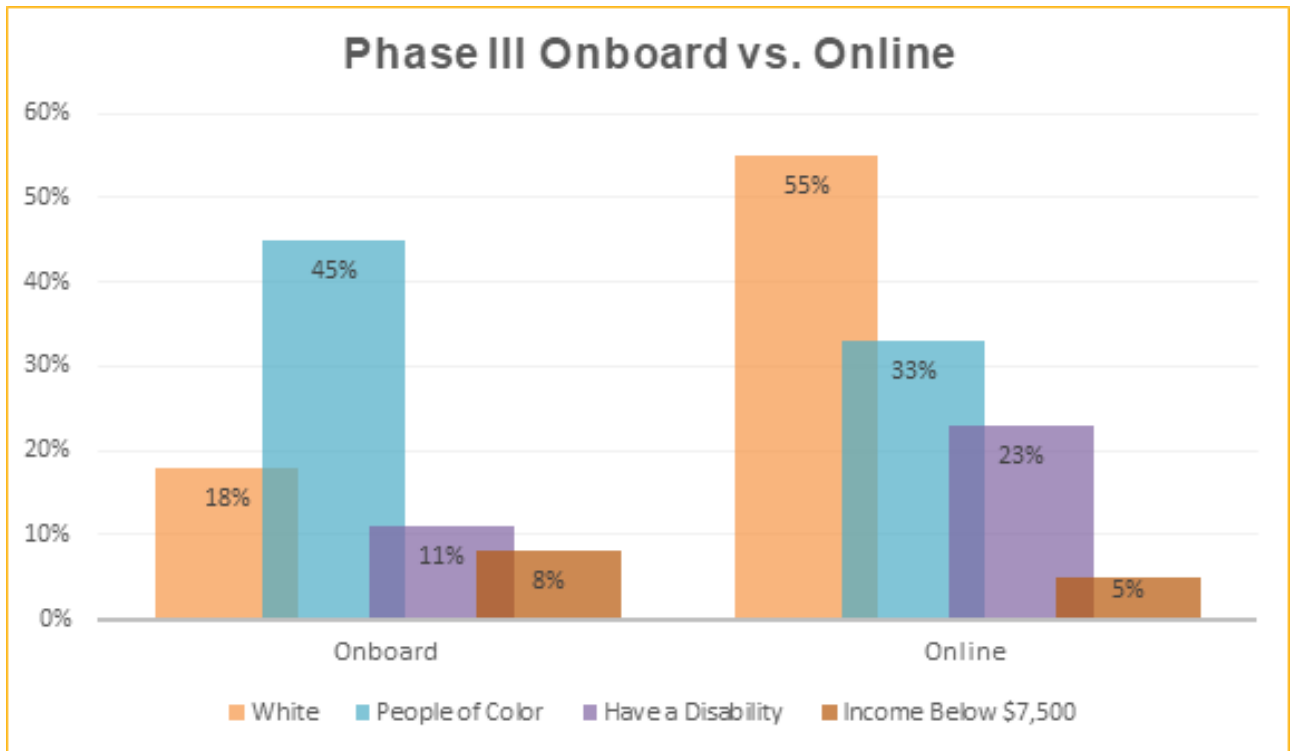
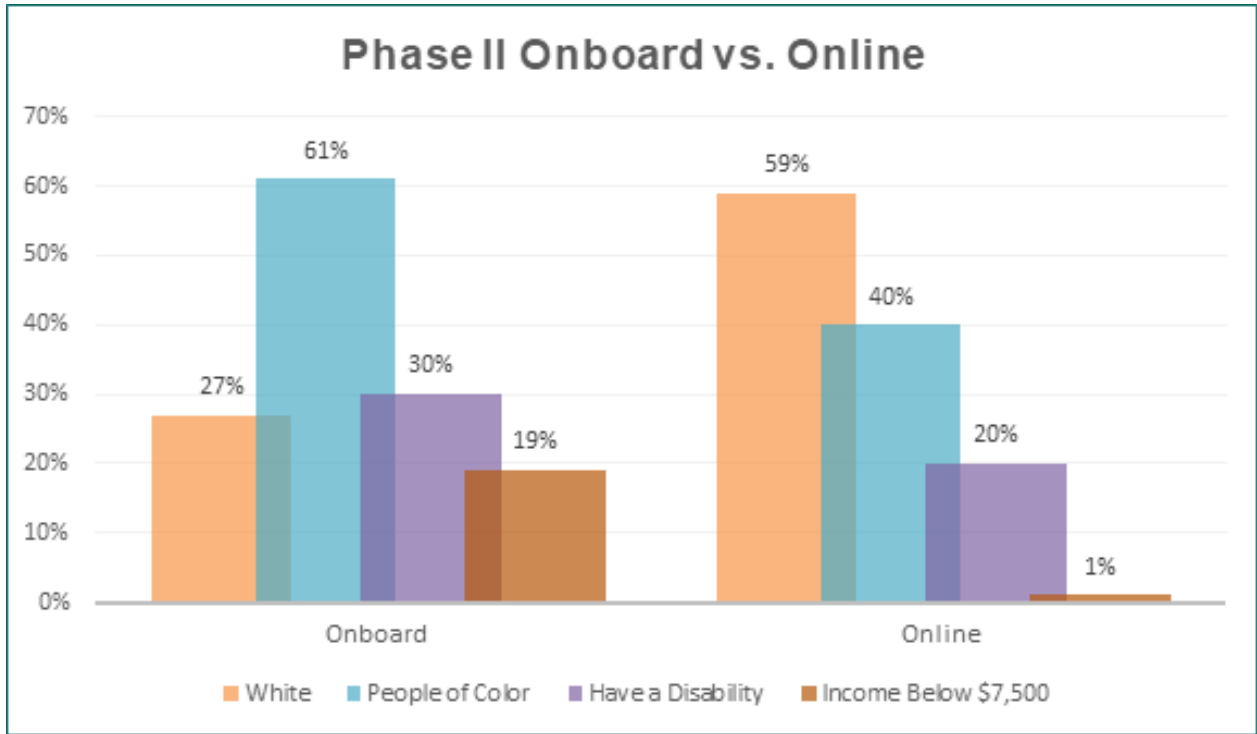
Method	Result
Rider alerts	49,321 alerts sent
On-board engagement	100+ hours
Online surveys	1,539 respondents
In-person comments	1500+
Tabling at community events	27 events tabled at
Intercept/on-board surveys	1,029 respondents
Briefings/events with jurisdictional or community partners	29 events or briefings attended
Stakeholder interviews	18 completed
Language translation for materials	8 languages, including: Spanish, Vietnamese, Russian, Simplified Chinese, Ukrainian, Somali, Arabic, and Amharic

Input from Priority Populations

The charts below illustrate some key information about the demographics⁵⁰ of people who responded to surveys as part of the Renton, Kent, Auburn Area Mobility Plan engagement.

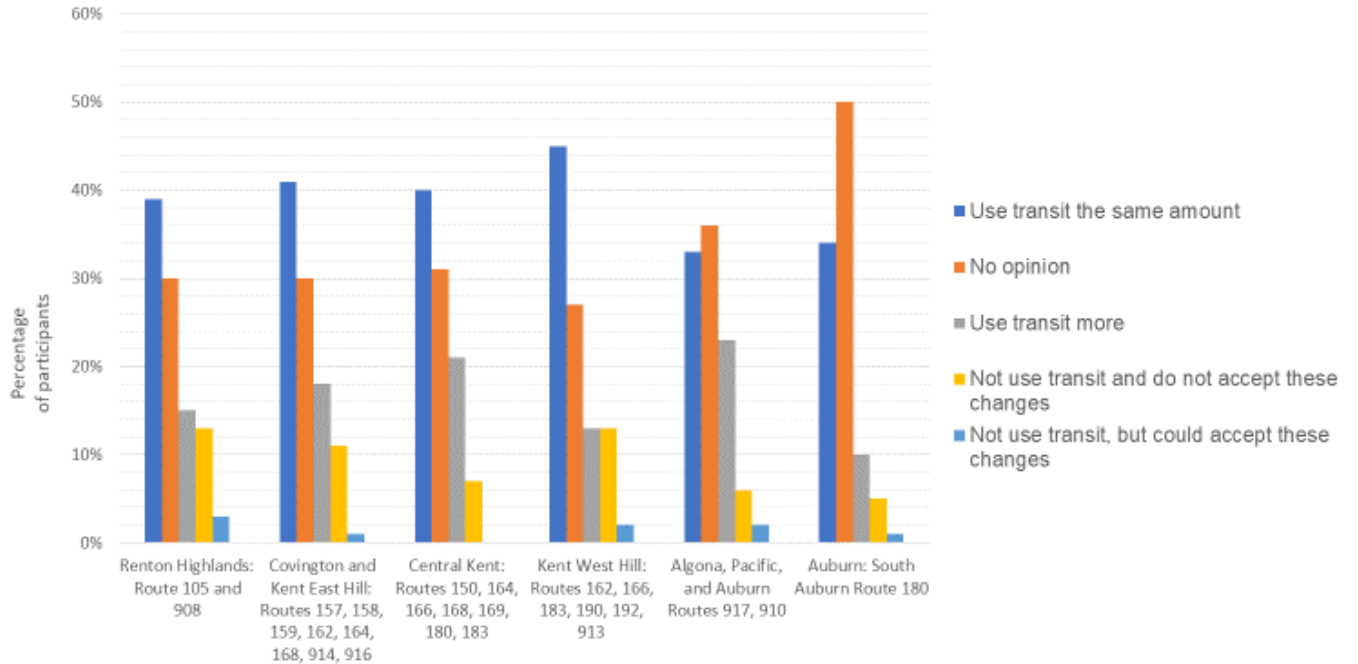


⁵⁰ Note: the charts used “people of color” because that is how people were asked to identify themselves, but those bars could also be labeled “minorities” to align with Title VI terminology.



Public response to the proposed network change

Overall, respondents will use transit at the same amount with the proposed final network, as shown in Figure 1.

Figure 1: RKAAMP Proposed Network - Expected Transit Usage

What Metro Heard: Key Themes and Needs

Through public input from interested parties, mobility board, and the public through interviews, surveys, at events, and at community meetings, Metro heard:

- Support for faster, more frequent bus service.
- Interest in more bus service throughout the day, into the evening, and on weekends.
- Provide a range of transit options including RapidRide service and more flexible options that meet the needs of the communities served.
- Serve community amenities and services such as shopping centers, transit centers, medical centers, schools, and residential areas.
- Continue to lead with equity and prioritize serving communities who have been communities experiencing historic and current underinvestment or inequities.

Outcomes

The result of the Renton-Kent-Auburn Area Mobility Plan will be a network of service that was developed in partnership with the local community and will increase local bus service; add fast, frequent, and reliable bus rapid transit service through the RapidRide I Line; and provide additional fixed-route and flexible services. In addition, this service change will upgrade the current Route 180, between Auburn Station and Kent Station, and combine it with the current Route 169, from Kent Station to Renton, in preparation for RapidRide I Line starting in 2023. The revised network will also expand options for those who travel midday, in the evening, and/or weekends, particularly for local travel.

Project #2: Policy Updates

In 2019, Metro developed a Mobility Framework to center equity and sustainability in the department's work to shape a mobility system for King County. In response to King County Motion 15253⁵¹, Metro designed and implemented an engagement approach that sought guidance from community members and leaders, as well as local interested parties who have firsthand experience and diverse perspectives on sustainable and equitable transportation.

The King County Council unanimously adopted the Mobility Framework in early 2020, providing Metro with the approval needed to begin updating its existing policy documents to reflect the Mobility Framework.

Metro's policy documents—including the Strategic Plan, Service Guidelines, and Metro Connects—help the department carry out its mission. These policy documents guide Metro's actions, measure progress, cover day-to-day operations, and help plan.

Engagement Approach

Metro's goals for engaging with interested parties and communities around the updates to the Strategic Plan, Metro Connects, and Service Guidelines were:

1. **Engage with the Equity Cabinet and regional community and elected officials** to inform Metro's policy updates to center equity and sustainability, align with the Mobility Framework, and clarify how Metro and the region can deliver Metro Connects.
2. **Coordinate messages on Metro's planned service reductions** (as simultaneous outreach will be occurring) **and frame the importance of the policy updates** for delivering equitable and sustainable mobility and supporting capital projects in the region.
3. **Build regional support for equitable and sustainable policies** through the updates and lay the groundwork for their adoption in late 2021.
4. **Engage with the Equity Cabinet** to ensure that the policy updates align with the recommendations and Guiding Principles of the Mobility Framework.
5. **Engage with the Regional Transit Committee** (RTC) on a regular basis to ensure that the policy updates align with countywide needs and reflect county goals of mobility, equity, regional growth, and other areas.
6. **Engage with other interested parties** including community-based organizations, employers, jurisdictional staff, elected officials, Metro staff, and others to consult on key issues and share their feedback with the Equity Cabinet and RTC.
7. **Inform other interested parties, Metro riders, and the public** about the policy updates at key milestones.

Consistent with direction in King County Council Motion 15253 and the King County Strategic Plan for Equity and Social Justice, Metro prioritized engaging with communities and representatives of low- and no-income populations, minorities, immigrants, and refugees, limited English-speaking populations, and people with disabilities (see Section B4 of King County Council Motion 15253 for more details on the priority populations identified in the Mobility Framework). To center the perspectives and needs of these priority populations, Metro intentionally engaged the Equity Cabinet, community advocates, and King County Technical Advisory Committee (TAC) members who represent priority populations.

To update these documents, Metro engaged with a variety of people and groups on the policy updates in different ways as described in Table 5. **Error! Reference source not found..**

⁵¹ Motion 15253 [[LINK](#)]

Table 5: Levels of Engagement for Policy Updates

	Inform	Consult	Collaborate/Accountability	Decide
Who	<ul style="list-style-type: none"> • General public • Riders 	<ul style="list-style-type: none"> • Metro staff • Advisory groups • Community-based organizations • Regional employers • Advocacy groups • Transit Partners • Working groups of interested parties 	<ul style="list-style-type: none"> • Equity Cabinet • Jurisdiction policymakers and staff through RTC, RTC staff, and Metro Connects Technical Advisory Committee (TAC) 	<ul style="list-style-type: none"> • Regional Transit Committee (RTC) • King County Council Mobility and Environment Committee • King County Executive
How	<ul style="list-style-type: none"> • Website • Blog posts • Emails 	<ul style="list-style-type: none"> • Workshops at standing meetings • Hosted virtual workshops • Co-sponsored virtual workshops with community-based organizations to engage targeted priority populations 	<ul style="list-style-type: none"> • Regular, ongoing, working meetings (RTC, Equity Cabinet, Metro Connects TAC) 	<ul style="list-style-type: none"> • 1:1 briefing with members • Presentations at official meetings

Metro produced thematic summaries of the feedback. Example themes included:

- Prioritize serving areas with minority (BIPOC⁵²) populations, and with high numbers of essential workers and transit-dependent persons.
- Invest in suburban and rural areas in a regional equity approach.
- Use data to make more informed decisions about service planning.
- Provide accessible informational materials and engagement opportunities in multiple languages.
- Center equity when planning service reductions or restructures and invest where needs are greatest.

Engagement Findings for Policies

Strategic Plan

People who provided input shared some common recommendations such as the importance of Metro using data to make better decisions and being clear about how it will measure progress towards its goals. They also recognized that Metro’s success requires investing in its employees, riders, and the community at large. Those representing priority populations underscored that these investments must be equitable. For example, equitably investing in employees includes maintaining and promoting a diverse workforce; equitably investing in riders includes improving safety infrastructure and providing riders with innovative technologies and services that are accessible and inclusive; and investing in

⁵² “BIPOC” stands for “Black, Indigenous, and People of Color.”

communities includes prioritizing electric routes in neighborhoods with poor air quality, partnering with community-based organizations, and conducting multilingual outreach to learn how to improve services.

Interested parties also offered general comments on the Strategic Plan. Many comments encouraged Metro to seek stable funding sources and communicate the use of funds with taxpayers. They wanted to see Metro diversify funding beyond sales tax revenue and examine its farebox revenue policy with an equity lens, as well as monitor and respond to ridership trends throughout and beyond the pandemic. Some expressed that the new goals and associated measures are well-defined and scalable to a range of budget circumstances. Finally, those engaged emphasized that Metro should clarify how the agency will measure progress toward goals in the Strategic Plan.

Metro Connects

Community members who provided feedback emphasized the need for Metro to align transit planning with jurisdictional growth and land use planning, such that cities will have the infrastructure to support new growth. Participants also wanted Metro to engage interested parties around a regional ballot measure to fund the Metro Connects network vision. It was also suggested that Metro work with partners to foster a vision in which jurisdictional partners work together on regional issues.

As Metro plans for its future network, interested parties shared that the department should prioritize speed, reliability, connectivity, and accessibility. In terms of where Metro should invest in services, this surveyed group emphasized the importance of a regional equity approach that supports suburban and rural areas, of serving areas with minority populations, and of prioritizing routes with high numbers of essential workers and transit-dependent riders. As Metro makes these investment decisions, most group members agreed the department should be transparent about how it rates and selects areas in which to invest. Overall, representatives of priority populations echoed the sentiments of participants at large regarding how Metro should plan its future, with particular emphasis on accessibility, safety, and addressing the impacts of COVID-19.

Service Guidelines

People who participated in Metro's engagement stressed the importance of Metro trusting the expertise of its jurisdictional, employment, and community partners. In practice, this means Metro using equitable engagement principles to consult with partners as it considers different service changes and, in some cases, allowing community-based partners to conduct engagement with their constituents. Some interested parties wanted Metro to maintain service in areas that fall outside of places with the greatest unmet needs. However, many representatives of priority populations emphasized that Metro should prioritize service in areas with unmet needs; they encouraged Metro to use data from ridership during the COVID-19 pandemic to highlight the communities with essential workers that rely on transit the most and show where additional investment should be made.

This engagement group also offered general comments about the Service Guidelines, focused on balancing equity goals with climate and affordable housing goals around the county. For example, some emphasized the importance of providing service in areas where transit could significantly reduce car travel. Others recommended working with partners to prioritize affordable housing and accompanying transit access.

Outcome

Feedback from the engagement was incorporated into the policies and they were adopted by King County Council in December 2021 with Equity Cabinet member participating in the County Council presentations and several members and community organization representatives providing letters and

public comment in support of the policy updates. The Equity Cabinet chose to continue collaborating with Metro as it continues to move forward to implement the policies.

Project #3: Safety, Security, and Fare Enforcement (SaFE) Reform

The Safety, Security, and Fare Enforcement (SaFE) Reform Initiative⁵³ seeks to advance equity by building upon past efforts and working with partners to eliminate harms and emphasize customer and employee well-being. SaFE is an ongoing effort that informs department-wide practices and policies. The SaFE planning process launched in January 2021 in partnership with Metro employees and customers.

Early in planning, Metro established a project structure, outlined in Table 6, to create a new vision for safety and security and eliminate disproportionately negative outcomes of safety and security policies and practices on customers and employees, especially minority community members.

Table 6: SaFE Team Structure

Team Component	Role/Responsibilities
Lead Team	Responsible for planning and management components of the SaFE Reform Initiative; served as main point of contact for overarching reform efforts, facilitated and guided the engagement process, and presented initial concepts to leadership; comprised of Metro employees.
Core Team	Reviewed engagement results and report-outs from the outreach liaisons and participated in the co-creation of community agreements and the vision and definitions of safety; identified preliminary concepts for change that responded to the community engagement feedback and collaborated with the Equity Team to further develop, refine, and prioritize implementation of initial concepts; comprised of Metro employees.
Equity Team	Served as consensus-building body with employees and customers; provided strategic direction on planning activities; provided diverse perspectives from non-leadership employees and minority customers; represented identities such as youth, elderly and disabled; primary influencers for engagement approach; prioritized proposed initial concepts; comprised of six non-leadership Metro employees and six community members.
Outreach Liaisons	Metro contracted with ten community-based organizations that serve the communities to assist design of engagement methods, provide feedback, and facilitate engagement in ways that are welcoming, accessible, and culturally appropriate to the communities they serve.
Ad Hoc Teams	Collaborated on research, concept development, and implementation elements; hosted in-depth feedback sessions focusing on customer experience, unhoused population, and transit police/fare enforcement; comprised of Metro employees and external experts.
Subject Matter Experts	Knowledgeable professionals provided insight and advice on viability of activities and proposed initial concepts; assisted with risk identification, data collection, and concept design.
General Public and Metro Employees	Provided input that shaped the vision of safety; feedback about existing safety policies and potential changes was the basis for concept development.

⁵³ Safety, Security, and Fare Enforcement Reform Initiative website [[LINK](#)]

Team Component	Role/Responsibilities
Headwater People (Consultant)	Supported the design and facilitation of workshops with the SaFE Core and Equity Teams, and internal and external focus groups; supported the design of Phase 3 survey and analyzed survey results and development summaries and visualization of data.
Executive Department Offices	Office of Equity and Social Justice and Office of Performance, Strategy and Budget provided support and feedback, encouraged participation, committed to the outcomes of engagement.
Metro Leadership	Provided project oversight; participated in engagement efforts, encouraged participation by Metro employees and the public, committed to the outcomes of engagement.

Metro contracted with ten community-based organizations, listed in Table 7, to assist with design of engagement methods, provide feedback, and facilitate engagement in ways that are welcoming, accessible, and culturally appropriate to the communities they serve.

Table 7: Organizations Engaged Through SaFE

Organization	Communities Served
Africans on the Eastside	Students and families on the east side of Seattle, particularly English Language Learners, Immigrants, and minority (BIPOC) communities
Alliance of People with disAbilities	People with disabilities in King County
API Chaya	Survivors of gender-based violence and human trafficking, particularly South Asian, Asian, Pacific Islander, and immigrant communities
Chinese Information and Service Center (CISC)	Immigrants of Chinese, Eastern European, Latin American, and Asian descent, including seniors and adults with disabilities throughout King County
Hopelink	Homeless and low-income families, children, seniors, and people with disabilities in King County
Latino Community Fund	Latino communities in Washington State
Mother Africa	African refugee and immigrant women
Seattle Chinatown International District Preservation and Development Authority (SCIDpda)	Seattle Chinatown International District neighborhood
Villa Comunitaria	Latinx community in the Duwamish Valley
Youth for Equitable Streets	Minority (BIPOC) youth in South King County

This team approach provided a venue for effective collaboration and allowed for group decision-making amongst all SaFE teams. Staff engaged with interested parties both internally and externally, collaborating with over a dozen community organizations to conduct focus groups with customers and Metro employees. Metro conducted multiple public surveys to inform the development of the proposed initial concepts.

Description of SaFE Engagement and Co-creation Processes and Plans

To support the SaFE Reform work, Metro developed a four-phase engagement process to co-create with community potential concepts for change to policies and practices:

Phase 1 involved engagement with Outreach Liaisons to develop a definition of co-creative engagement. In this phase of the engagement process, the SaFE team engaged with internal and external parties to deepen the understanding of what it means to co-create with communities. Metro conducted eleven group interviews with community-based organizations that provide services to historically underserved populations, hosted an external community member focus group, and an internal employee focus group. Phase 1 engagement resulted in an engagement strategy for the SaFE reform work as well as the following SaFE vision: “Safe, accessible, and equitable transit that is co-created to support community well-being.”

Phase 2 obtained feedback from participants to provide transparency in decision-making processes, devised community agreements, and co-created a vision of a safe and welcoming Metro. The SaFE vision survey received 5,641 total responses, of which 1,010 identified as employees, 4,631 identified as external community members, 1,485 identified as low-income, and 2,003 identified as minority (BIPOC), Multiracial, or Biracial. Phase 2 engagement and analysis of the resulting qualitative data resulted in the following most common themes in support of the SaFE vision:

- o More cameras, lighting, accurate real-time arrival information, design for safety, and way-finding elements.
- o Clean facilities and more inclusive and welcoming visual cues, including in-language information and art.
- o More security and enforcement of Code of Conduct rules.
- o Friendly and helpful drivers and staff.

In addition to the themes above, some community members shared harmful experiences with other riders yelling, threatening, being intoxicated, and breaking Code of Conduct rules.

Phase 3 survey respondents had the opportunity to identify whether current policies support the SaFE vision statement in four key areas: physical environment, Code of Conduct, fares, and security. A total of 2,053 individuals responded to the policy survey, including 216 King County Metro employees, and thirteen focus groups were hosted. In general, more than half of all respondents indicated that most *existing* policies support the SaFE vision, or these policies support the vision but are inconsistently applied. The policies listed below were those most frequently identified (by more than 65 percent of all respondents) as either supporting the vision or supporting the vision but not being consistently practiced:

- o Employee facilities are cleaned twice a day
- o Bus stops and Metro stations are cleaned weekly
- o Operators address unsanitary conditions onboard buses or request a new coach
- o Graffiti containing hate speech or symbols is the highest priority for removal

- o Surveillance cameras are in place and footage is monitored at Metro facilities
- o Lighting at Metro passenger facilities is implemented in limited visibility situations
- o Buses have cameras on board that store video footage, but they are not monitored in real-time
- o Code of Conduct rules for passengers
- o Anyone in violation of the Code of Conduct may be asked to leave the Metro vehicle
- o Customers should alert a driver or call 911 if there is a crime or medical emergency
- o If a sleeping passenger does not respond, an operator should contact TCC

Phase 4 identified engagement themes and recommendations gathered through prior engagement phases. The feedback collected informed the development of 23 potential concepts for changes to current policies and practices, which were then reviewed and prioritized by the Equity and Core Teams into 20 proposed initial concepts.

Outcomes

Shown in Table 7, proposed initial concepts for SaFE Reform are grounded in the insights gathered through SaFE engagement, including survey responses from the public and Metro employees, and guided community conversations focusing on minority (BIPOC) voices. The collective impact of these concepts and actions will be to reduce harm to customers, avoid introducing customers to law enforcement, and limit pathways to the criminal legal system via transit.

Table 8: SaFE Initial Proposed Concepts

SaFE Initial Proposed Concepts
<i>9a. Proposals related to Metro Transit Police</i>
1. Co-create with community an alternative enforcement approach to minor Code of Conduct violations
2. Revise the Code of Conduct to remove minor Code of Conduct violations such as tobacco and smells
3. Utilize automatic messaging and "Ride Right" information on coaches
4. Deploy problem-solving community policing strategies near transit centers through transit resource officers or community security partnerships
<i>9b. Proposals related to Fare Enforcement</i>
1. Establish and pilot a fare enforcement replacement program
2. Revise the Code of Conduct to remove minor Code of Conduct violations such as tobacco and smells
3. Update and clarify standard operating procedures for all employees who operate in shared spaces with security and fare enforcement staff and train employees on the procedures routinely

4. Pilot a program to station resources such as transit information, fare support, and crisis management at transit centers in areas where needs are greatest as described by Metro’s Mobility Framework
<i>9c. Proposals related to Safety and Security Functions</i>
1. Pilot support teams, including security, fares, and social services professionals
2. Pilot stationing security officers at transit centers to increase presence to deter misconduct
3. Pilot a program to station resources such as transit information, fare support, and crisis management at certain transit centers
<i>9d. Proposal related to Non-police Services</i>
1. Increase Metro's representation and participation in regional social services/human services coordination
2. Secure social services partnerships to refine practices and pilot new methods of safety and security operations and programming
3. Pilot support teams, including security, fares, and social services professionals

Additional SaFE Concepts
1. Prioritize language access-related position openings
2. Develop an accessible de-escalation curriculum
3. Prioritize an anti-discrimination training program
4. Prioritize frontline supervisor staffing
5. Identify maintenance needs
6. Pilot design changes to transit stops
7. Expand marketing of reduced fare products
8. Additional training budget for frontline workers
9. Support Metro New Employee Orientation
10. Expand Neighborhood Pop-up
11. Activate transit centers
12. Pilot a communication platform for non-emergency feedback

In 2022 Metro will continue to engage minority (BIPOC) community members as it moves forward to implement recommendations. Further community engagement will help Metro define these recommendations by reviewing best practices and data, prioritize which are implemented first, and define metrics and evaluation factors for continuous improvement.

K. Language Assistance Plan

Improving and removing barriers to accessible communication, including for LEP individuals, is a priority, so services, programs, and activities are meaningfully accessible to all constituents. Metro is updating its language equity policy practices, resourcing, and guidance – including the Language Assistance Plan - in accordance with the King County Language Access Program⁵⁴. Metro is hiring a Language Equity Program Specialist to help update and implement Metro’s plans for language equity in accordance. Appendix E to this report includes the most recent plan (2019 version), which will be updated by March 2023.

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 spoken in the county (Metro’s service area). Metro relies on these findings, which are based on five data sources, in our language assistance program.

Metro’s current practice, per County policy, is to translate public communication materials and vital documents into Spanish—by far the most spoken non-English language in King County—and the other top five⁵⁵ languages spoken in the county (Chinese, Korean, Russian, Somali, and Vietnamese). If Metro is launching a project or campaign in a specific county area, teams also look at the demographic and data resources to translate into additional languages as needed. Most materials include the interpreter symbol and the phone number for Metro’s Customer Service, which also provides live interpretation in the top tier languages and others 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. Metro ensures best practices for translation and uses Google Translate only when necessary.

Per the King County Executive’s written order on translation⁵⁶, 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. Metro may use alternative forms of language assistance, such as partnering with community-based organizations for outreach or interpretation services, when these alternatives are more effective or practical. Metro also determines the most effective and preferred method of communication for different language populations (e.g., video webinars, radio ads, TV, etc.) and implements accordingly.

Available data and Metro’s experience affirm that many refugees and immigrants who may have limited English proficiency rely on transit, and Metro offers several language resources to assist these customers. These include translated communication materials about services, interpretation by Customer Service staff through a Language Line, widely recognized pictograph symbols used on signage, notices of Title VI obligations and remedies translated into nine commonly spoken languages, and multi-lingual community travel videos that are posted online and distributed to community-based

⁵⁴ The Language Access Program provides guidance and tools to departments, agencies, residents, and businesses [\[LINK\]](#). For example, Metro uses this website to determine the top ten languages (some of which mentioned in this report).

⁵⁵ Maps of the top six languages spoken (Spanish, Chinese, Korean, Russian, Somali, and Vietnamese) [\[LINK\]](#)

⁵⁶ Written Language Translation Process Executive Order [\[LINK\]](#)

organizations. Metro has also added in-language emergency coach announcements in Spanish, Mandarin, Cantonese, and Vietnamese.

When Metro conducts outreach and engagement concerning proposed service changes, Metro provides translated descriptions of the proposals and questionnaires as needed, 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.

L. 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. All new subrecipients must submit a Title VI plan at the time of contracting, and therefore Metro collected Title VI plans from any new subrecipients in 2019. 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 F.

Grants staff:

- Requires that the prospective subrecipient complete a Risk Assessment prior to entering an agreement with them.
- Evaluate completed risk assessment to determine if the subrecipient is low, medium, or high risk and plan monitoring activities accordingly.
- Emails the primary contact for the subrecipient to inform them of the outcome of the risk assessment.
- 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.
- Electronically save a copy of the risk assessment, subrecipient agreement/contract, FFATA form and Title VI plan.
- Submit FFATA information in the www.FSRS.gov website.
- Review a copy of their single 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 numerous 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 these efforts promote the use of transit, carpools, vanpools, biking, walking and other alternatives to SOV travel.

The City of Redmond is leading this work, with 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.

M. Review of Facilities Constructed

Between July 2019 and June 2022, Metro's Marine Division opened their FTA-funded Passenger Only Ferry Terminal (in August 2019). Metro also built a new "interim" base at South Campus. Construction began in 2019 with substantial completion in summer 2021. Though not directly called a Title VI analysis, Metro created an Equity and Social Justice Plan for the project, as well an alternatives analysis (both in Appendix G). The Equity and Social Justice Plan analyzed race, color, and national origin as required by Title VI, as well as education and income levels, neighborhood tree canopy coverage, and environmental health disparities. A list of recommendations was generated to improve the determinants of equity in the project neighborhood through commitments that related directly to known disparities in the community, regulatory requirements, and sustainability. The Alternatives Analysis explored numerous environmental and socio-economic factors in its review of potential candidate sites and a "no action" alternative. In the future Metro will complete a separate Title VI analysis for projects of this magnitude.

N. 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 H when the approval process is completed and will be included in the transmittal that is submitted to the FTA.

IV. SECTION II: Requirements of Transit Providers

O. Service Standards and Service Policies

Metro's service standards and service policies are guided by Metro's adopted Service Guidelines. The service changes that occurred in the time frame of this report (July 2019 through June 2022) were driven by the version of Metro's Service Guidelines that was adopted in 2015 through Ordinance 18301⁵⁷. Thus, the analyses discussed below use the 2016 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.

The figures reported in this section are from Metro's spring 2021 service change (March 2021 to June 2021), and the 2020 System Evaluation report (see Appendix I). The 2020 System Evaluation Report was informed by 2019 data and the previous 2016 Service Guidelines. Metro chose to use the 2020 System Evaluation instead of the 2021 report here, as the pandemic's impact on ridership and Metro's system made the 2021 report harder to interpret. For example, the 2021 report includes several suspended routes, compared to the 2020 report which includes all routes.

Metro also updated its Service Guidelines more recently, with the King County Council adopting the final version in December 2021 through Ordinance 19367⁵⁸. Both the old and current versions of the Service Guidelines are in Appendix B. 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 18301⁵⁹). The methodology for designating "minority routes" follows. The "low-income" designation is based on a similar methodology.

Minority and Low-Income 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.

Metro next compares 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 (from the fall 2020 service change), 60 percent or more of boardings on a route must be in a minority tract for that route to be classified as a minority route. For a route to be low-income, 63.2 percent or more of boardings must be in a low-income tract.

⁵⁷ Ordinance 18301 [[LINK](#)]

⁵⁸ Ordinance 19367 [[LINK](#)]

⁵⁹ Ordinance 18301 [[LINK](#)]

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 2021, 48 percent of bus stops must be in a minority tract for a DART route to be classified as a minority route. For a DART route to be classified as low-income, 47.8 percent of bus stops must be in a low-income tract.

Vehicle Load

Metro's load standard is also defined in the 2016 Service Guidelines. The method for calculated vehicle load in the recently adopted 2021 Service Guidelines did not change from the 2016 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.

System-Wide Vehicle Load Data

Average loads within all time periods indicate significant available capacity in the Metro system, largely because ridership is still impacted by the COVID-19 pandemic. However, even with the decline in ridership during the pandemic, specific trips can be crowded even if there is capacity available on average. Based on Metro's 2020 System Evaluation (Motion 15802⁶⁰), which used fall 2019 data, six routes were 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 9. Of these routes, two were classified as "minority", one as both "minority and low-income", and none as "low-income only". The remaining routes were "non-minority" and "non-low-income".

⁶⁰ Motion 15802 [[LINK](#)]

Table 9: Routes Needing Investment to Reduce Weekday Passenger Crowding, 2020 System Evaluation

Route	Minority Route	Low Income Route	Daily One-Way Trips Needed
33	NO	NO	1
40	NO	NO	1
62	NO	NO	1
125	YES	YES	2
D Line	NO	NO	2
E Line	YES	NO	2

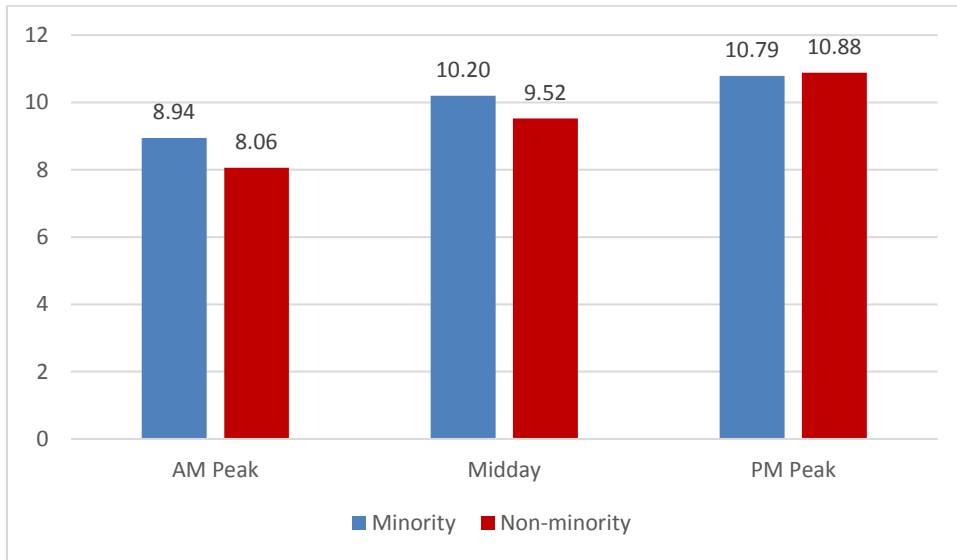
Load Information by Minority Classification

Table 10 and Figure 2 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 declined from previous years, due to the impact of the COVID-19 pandemic on ridership. Loads and load factors are higher for minority routes than for non-minority routes in the AM peak and Midday periods. In the PM peak, when average loads are the highest, minority routes have similar loads as non-minority routes. The differences are slight, and given COVID-19, it was rare that any routes were crowded or over capacity. Due to the drop in typical commute trips resulting from work-from-home policies, average midday passenger loads in some cases exceeded loads during the AM and PM peak periods.

In general, these figures reflect a change in ridership patterns during the pandemic, where routes serving communities using transit for essential trips maintained their ridership better than routes providing peak only or express service primarily for those commuting to major employment centers.

Table 10: Average Loads by Minority Classification, Spring 2021

	AM Peak Inbound		Midday Inbound & Outbound		PM Peak Outbound	
	Load/Seats	Avg Load	Load/Seats	Avg Load	Load/Seats	Avg Load
Minority route	0.19	8.94	0.24	10.20	0.23	10.79
Non-minority route	0.17	8.06	0.20	9.52	0.22	10.88
<i>System</i>	<i>0.18</i>	<i>8.39</i>	<i>0.21</i>	<i>9.80</i>	<i>0.23</i>	<i>10.70</i>

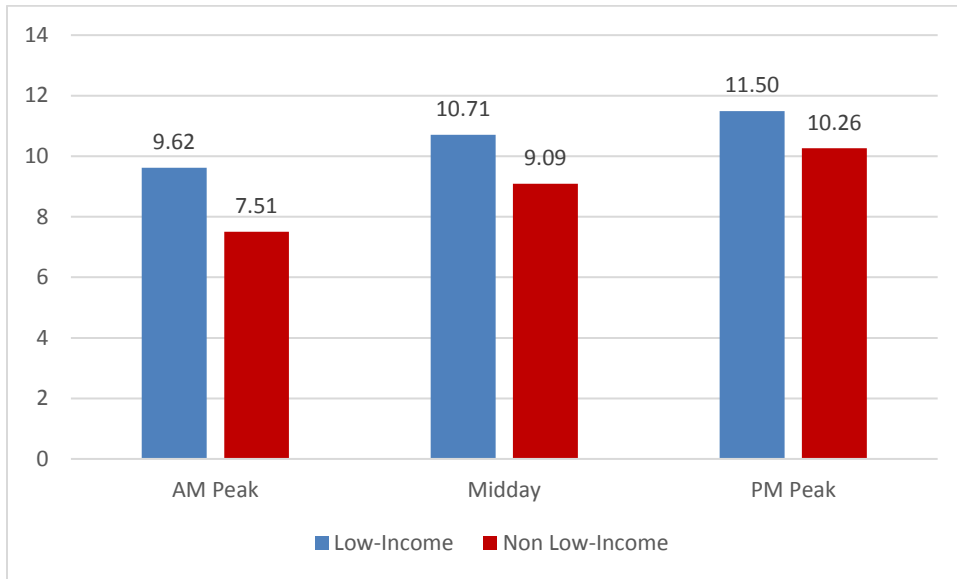
Figure 2: Weekday Average Loads by Minority Status, Spring 2021

Income Classification

Table 11 and Figure 3 show the average vehicle loads and load factors for Metro routes for each period between low-income and non-low-income routes. Loads and load factors are generally higher for low-income than for non-low-income routes for all periods. Like the load figures by minority classification, the figures reveal that during the pandemic, routes classified as low-income serve customers that rely on transit to a greater extent than the typical customer served by non-low-income routes.

Table 11: Average Loads by Low-Income Classification, Spring 2021

	AM Peak Inbound		Midday Inbound & Outbound		PM Peak Outbound	
	Load/Seats	Avg Load	Load/Seats	Avg Load	Load/Seats	Avg Load
Low-Income route	0.20	9.62	0.23	10.71	0.26	11.50
Non-low-income	0.15	7.51	0.20	9.09	0.22	10.26
<i>System</i>	<i>0.18</i>	<i>8.39</i>	<i>0.21</i>	<i>9.80</i>	<i>0.23</i>	<i>10.70</i>

Figure 3: Weekday Average Loads by Low-Income Status, Spring 2021

Vehicle Headways

Metro's 2016 Service Guidelines (in Appendix B) define service levels based on frequency of service. Though the service levels in the 2021⁶¹ adopted Service Guidelines are slightly different, Table 12 shows the 2016 levels, because the 2016 Service Guidelines was adopted policy for much of the three-year period covered by this report.

Table 12: 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				

⁶¹ See appendix B

*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 2021, average headways were lower (i.e., service was more frequent) for minority routes than for non-minority routes during most time periods on weekdays and weekends. The one exception is the Night period on weekdays and Saturday. Weekday Night routes had a larger difference with minority routes having an average 43 more minutes between buses than non-minority routes. One reason for the large difference is that minority routes had longer spans on weekdays, nearly one more hour than non-minority routes. As a result, those routes ran later at night, 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. Average trips were generally similar, with minority routes having four more average trips on weekdays and non-minority routes having three more trips on average on weekends. Table 13 shows average headways by minority classification for the Spring 2021 period.

Table 13: Average Headways by Minority Classification, Spring 2021

WEEKDAY	Average Headway (Minutes between Buses)					Average Span (Hours)	Average # Trips ⁶²
	AM Peak	Midday	PM Peak	Evening	Night		
Minority route	12	13	17	18	97	17.7	47
Non-minority route	16	24	30	19	54	16.8	43
<i>System</i>	<i>14</i>	<i>18</i>	<i>24</i>	<i>19</i>	<i>78</i>	<i>17.1</i>	<i>44</i>
SATURDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Minority route	17	17	38	17.4	39		
Non-minority route	20	20	37	17.5	42		

⁶² Inbound direction only

<i>System</i>	19	18	37	17.5	40
SUNDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips
	Daytime	Evening	Night		
Minority route	18	18	34	17.5	38
Non-minority route	20	19	36	17.9	41
<i>System</i>	19	19	35	17.7	39

In spring 2021, low-income routes had lower headways than non-low-income routes on weekdays and slightly longer headways on weekends during the daytime and evening time periods. Low-income routes had sizably larger Night period headways on weekdays and weekends. Low-income routes had longer average spans of service (one more hour on average) and more average trips per day on weekdays but similar spans of service and number of trips on weekends. Table 14 shows average headways by income classification for the Spring 2021 period.

Table 14: Average Headways by Low-Income Classification, Spring 2021

WEEKDAY	Average Headway (Minutes between Buses)					Average Span (Hours)	Average # Trips ⁶³
	AM Peak	Midday	PM Peak	Evening	Night		
Low-income route	12	15	19	17	104	17.6	46
Non-Low-income	16	21	28	19	50	16.9	44
<i>System</i>	14	18	24	19	78	17.1	44
SATURDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Low-income route	20	19	45	17.4	39		
Non-Low-income	17	18	29	17.5	42		
<i>System</i>	19	18	37	17.5	40		
SUNDAY	Average Headway (Minutes between Buses)			Average Span (Hours)	Average # Trips		
	Daytime	Evening	Night				
Low-income route	20	19	41	17.8	39		
Non-Low-income	18	18	28	17.6	39		
<i>System</i>	19	19	35	17.7	39		

⁶³ Inbound direction only

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 2021, there was little difference in on-time performance between minority and non-minority routes (Table 15), or between low-income and non-low-income routes (Table 16). On-time performance for minority routes were slightly lower than non-minority routes on weekdays, Saturdays, and Sundays. Low-income routes were slightly less on-time than non-low-income routes. The difference in on-time performance derives from disparities in early arrivals, not late arrivals. Both minority and low-income routes suffered from earliness to a greater degree than their non-minority and non-low-income counterparts. Earliness persisted as a problem due to lower traffic volumes resulting from the pandemic, and the results suggest that corridors used by minority and low-income routes saw greater and/or more persistent declines in general traffic volumes.

Table 15: Average On-Time Performance by Minority Classification, Spring 2021

WEEKDAY	Percent On Time	Percent Late	Percent Early
Minority route	81%	11%	8%
Non-minority route	83%	11%	6%
<i>System</i>	<i>82%</i>	<i>11%</i>	<i>7%</i>
SATURDAY	Percent On Time	Percent Late	Percent Early
Minority route	79%	15%	6%
Non-minority route	80%	16%	4%
<i>System</i>	<i>79%</i>	<i>16%</i>	<i>5%</i>
SUNDAY	Percent On Time	Percent Late	Percent Early
Minority route	79%	14%	6%
Non-minority route	82%	14%	4%
<i>System</i>	<i>80%</i>	<i>14%</i>	<i>5%</i>

Table 16: Average On-Time Performance by Income Classification, Spring 2021

WEEKDAY	Percent On Time	Percent Late	Percent Early
Low-income route	81%	11%	8%
Non-low-income route	83%	11%	6%
<i>System</i>	<i>82%</i>	<i>11%</i>	<i>7%</i>
SATURDAY	Percent On Time	Percent Late	Percent Early
Low-income route	79%	15%	6%
Non-low-income route	80%	16%	4%
<i>System</i>	<i>79%</i>	<i>16%</i>	<i>5%</i>

SUNDAY	Percent On Time	Percent Late	Percent Early
Low-income route	80%	14%	6%
Non-low-income route	81%	15%	4%
<i>System</i>	<i>80%</i>	<i>14%</i>	<i>5%</i>

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 17. This data helps us determine where service investments are needed.

Table 17: Lateness Threshold by Time Period (Metro Service Guidelines)

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

Table 18 shows the 61 routes that, based on Metro's 2020 System Evaluation (Motion 15802⁶⁴), were 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 61 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 18: Routes Needing Investment to Improve Schedule Reliability, 2020 System Evaluation

Route	Day Needing Investment	Minority Route	Low-Income Route
1	Sunday	NO	NO
5	Saturday	NO	NO
7	Saturday	YES	YES
8	Sunday	YES	NO
10	Weekday	NO	YES
11	Sunday	NO	YES
15X	Weekday	NO	NO
17X	Weekday	NO	NO
18X	Weekday	NO	NO
21	Saturday	YES	YES
22	Weekday, Sunday	NO	NO
24	Saturday, Sunday	NO	NO

⁶⁴ Motion 15802 [[LINK](#)]

Route	Day Needing Investment	Minority Route	Low-Income Route
26X	Weekday, Saturday	NO	NO
28X	Saturday, Sunday	NO	NO
33	Saturday	NO	NO
40	Saturday, Sunday	NO	NO
43	Weekday	NO	YES
50	Weekday	YES	YES
60	Weekday, Saturday	YES	YES
62	Weekday, Saturday	NO	NO
63X	Weekday	NO	NO
64X	Weekday	NO	NO
76	Weekday	NO	NO
77X	Weekday	NO	YES
106	Weekday	YES	YES
116X	Weekday	NO	NO
119	Weekday	NO	NO
124	Saturday	YES	YES
125	Weekday	YES	YES
131	Weekday, Saturday, Sunday	YES	YES
132	Weekday, Saturday	YES	YES
143	Weekday	YES	NO
153	Weekday	YES	YES
154	Weekday	YES	YES
156	Sunday	YES	YES
157	Weekday	YES	NO
159	Weekday	YES	YES
167	Weekday	YES	YES
169	Saturday	YES	YES
186	Weekday	YES	YES
190	Weekday	YES	YES
193X	Weekday	YES	YES
197	Weekday	YES	YES
208	Weekday, Saturday	NO	NO
218	Weekday	YES	NO
226	Sunday	YES	NO

Route	Day Needing Investment	Minority Route	Low-Income Route
232	Weekday	YES	NO
235	Weekday	NO	NO
238	Weekday	NO	NO
244	Weekday	NO	NO
257	Weekday	NO	NO
268	Weekday	YES	NO
277	Weekday	NO	NO
301X	Weekday	YES	YES
303X	Weekday	NO	NO
308	Weekday	NO	NO
309X	Weekday	NO	YES
316	Weekday	NO	YES
330	Weekday	NO	YES
342	Weekday	NO	NO
E Line	Weekday	YES	NO

Service Availability

Metro strives to make service available in accordance with its policies. Since the Strategic Plan for Public Transportation was being updated in 2021-21, Metro did not transmit a Strategic Plan Progress report to the King County Council in 2020. As such, the most up-to-date data to measure accessibility was compiled as part of the 2021 update to Metro Connects in “Technical Report B – Metro Connects – Service Network⁶⁵” to the policy updates. Table 19 shows how accessible transit was in 2019 to the overall King County population, low-income population, and minority population. In addition, 81 percent of jobs in King County were within one half mile of frequent service and one quarter mile of all service.

Table 19: Proximity of Transit Stops to Where People Live

	Total Population	Low-Income Population	Minority Population
Frequent Service 15-minute or better (1/2 mile)	62%	69%	67%
All Service (1/4 mile)	67%	73%	71%

Vehicle Assignment

Metro’s fleet includes diesel, hybrid, battery-electric, 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

⁶⁵ King County Metro Policy Updates Technical Report B [[LINK](#)]

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 20 shows the average age of buses based on the spring 2021 schedule period in relation to the minority route classification. On all days of the week, the vehicles used on minority routes were older on average than those used on non-minority routes.

Table 20: Average Assigned Vehicle Age by Minority Classification, Spring 2021

Minority Classification	Average Assigned Vehicle Age		
	Weekday	Saturday	Sunday
Minority route	6.6	7.3	7.4
Non-minority route	5.8	6.4	6.2
<i>System</i>	6.3	6.9	6.9

Table 21 shows the average age of buses in relation to the low-income route classification. On all days of the week, the vehicles used on low-income routes were older on average than those used on non-low-income routes.

Table 21: Average Assigned Vehicle Age by Income Classification, Spring 2021

Income Classification	Average Assigned Vehicle Age		
	Weekday	Saturday	Sunday
Low-income route	7.4	7.9	7.9
Non-low-income route	5.2	5.9	5.8
<i>System</i>	6.3	6.9	6.9

Metro would like to reduce the disparities between the average assigned vehicle ages, on all days of the week, for both minority and income route classifications. Metro will consider ways to factor in low and minority route classification data as it makes decisions about future vehicle assignment. Additionally, previously made decisions about where to assign new battery buses —made with equity in mind — should improve this disparity. 40 new battery electric buses will be added to South Base, the new 120 buses expected by 2025 will be added to Interim base, and the next 250 buses after that will be added at South Annex base. These bases are in areas with significant numbers of routes with higher equity scores.

Distribution of Transit Amenities

Stops

Metro provides a variety of amenities at bus stops. Metro's 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 22, below. These guidelines exclude segments of a route where riders cannot access service, such as on limited-access roads or freeways.

Table 22: 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, 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 23.

Table 23: 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 24. 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 24: Passenger Amenities at Bus Stops in Low-Income and Minority Tracts, Fall 2021

		Low-Income	Not Low-Income	Minority	Not Minority	All Zones
Total Active Stops⁶⁶	7,189					
ADA Compliant	5,893	86%	79%	83%	81%	82%
Benches	695	9%	10%	9%	11%	10%
Information Signs	206	4%	2%	3%	2%	3%
Schedule Holders	2,645	38%	36%	35%	39%	37%

⁶⁶ Active stops = Non-Layover, Active status as of 12/28/2021

		Low- Income	Not Low- Income	Minority	Not Minority	All Zones
RTIS	42	1%	0%	1%	0%	1%
Shelters	1,686	27%	20%	25%	22%	23%
Lighting	1,189	19%	14%	19%	14%	17%
Number of Zones		3,314	3,817	3,669	3,462	7,189

P. Demographics and Service Profile Maps and Charts

All maps are included in Appendix J. Figure 4 shows minority census tracts based on 2019 American Community Survey data, which was released in 2021. Metro routes are shown along with bus stops and key transit facilities. Sound Transit and Seattle Streetcar routes, which Metro operates, are also shown.

Figure 4: Demographic and Service Profile Map 1

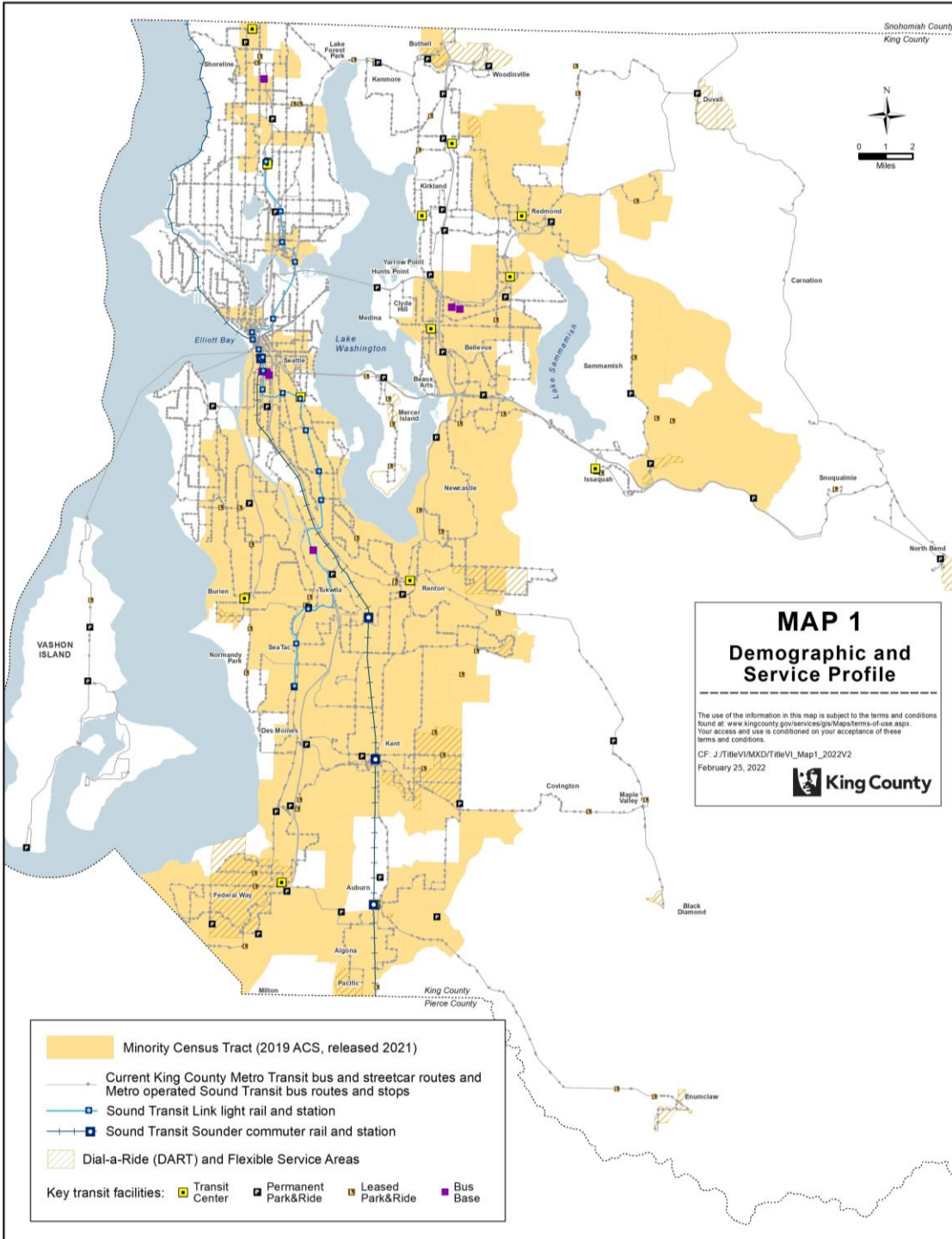


Figure 5 shows low-income census tracts based on 2019 American Community Survey data, which was released in 2021. It also shows all transit routes, stops, and stations and facilities such as bus bases, transit centers, Sounder and Link stations, and park-and-ride facilities.

Figure 5: Demographic and Service Profile Map 2

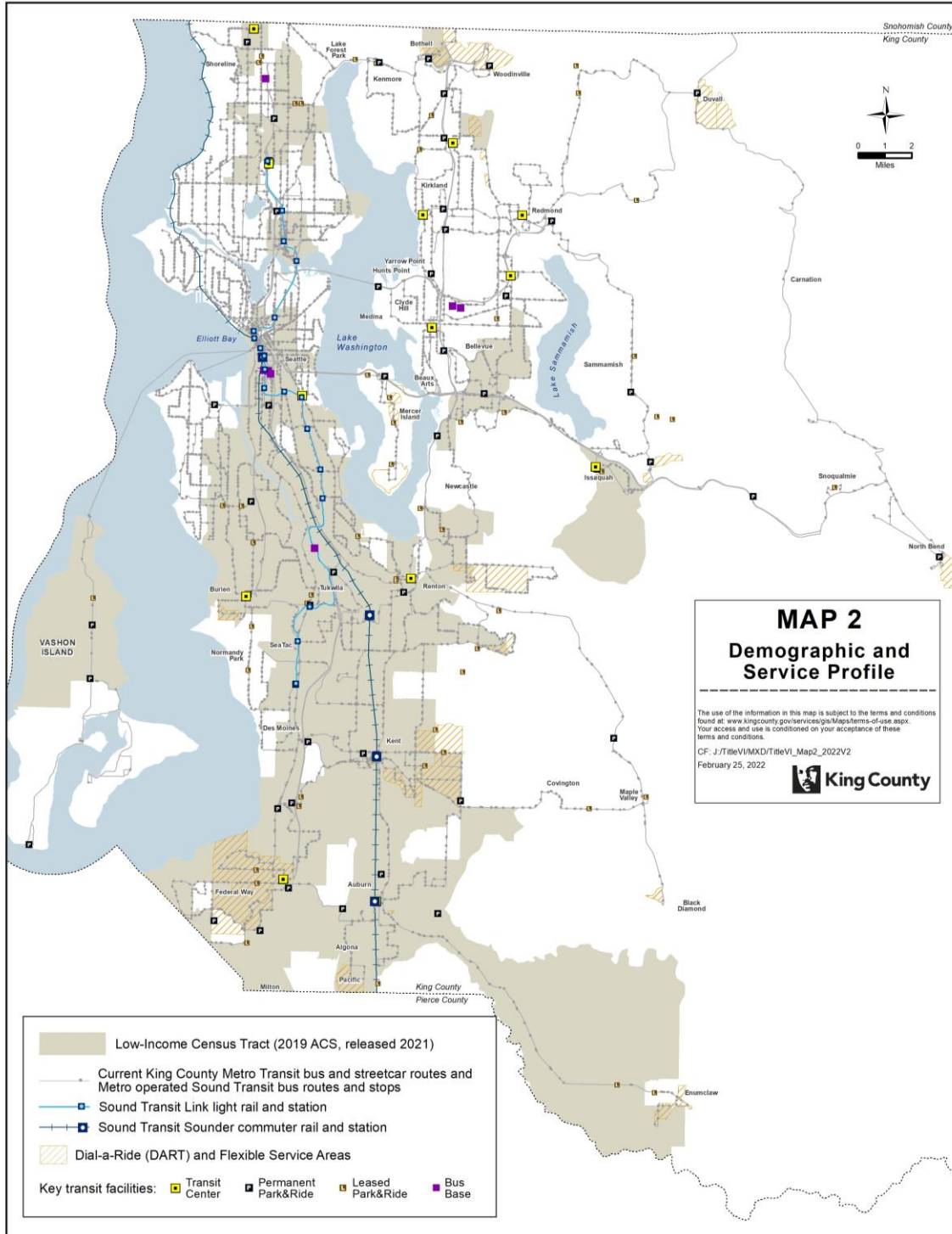


Figure 6 shows all transit routes and stations; transit facilities; and transit trip generators overlaid on top of census tracts that are minority, low-income, or both.

Figure 6: Transit Facilities/Trip Generators/Demographics - Map 3

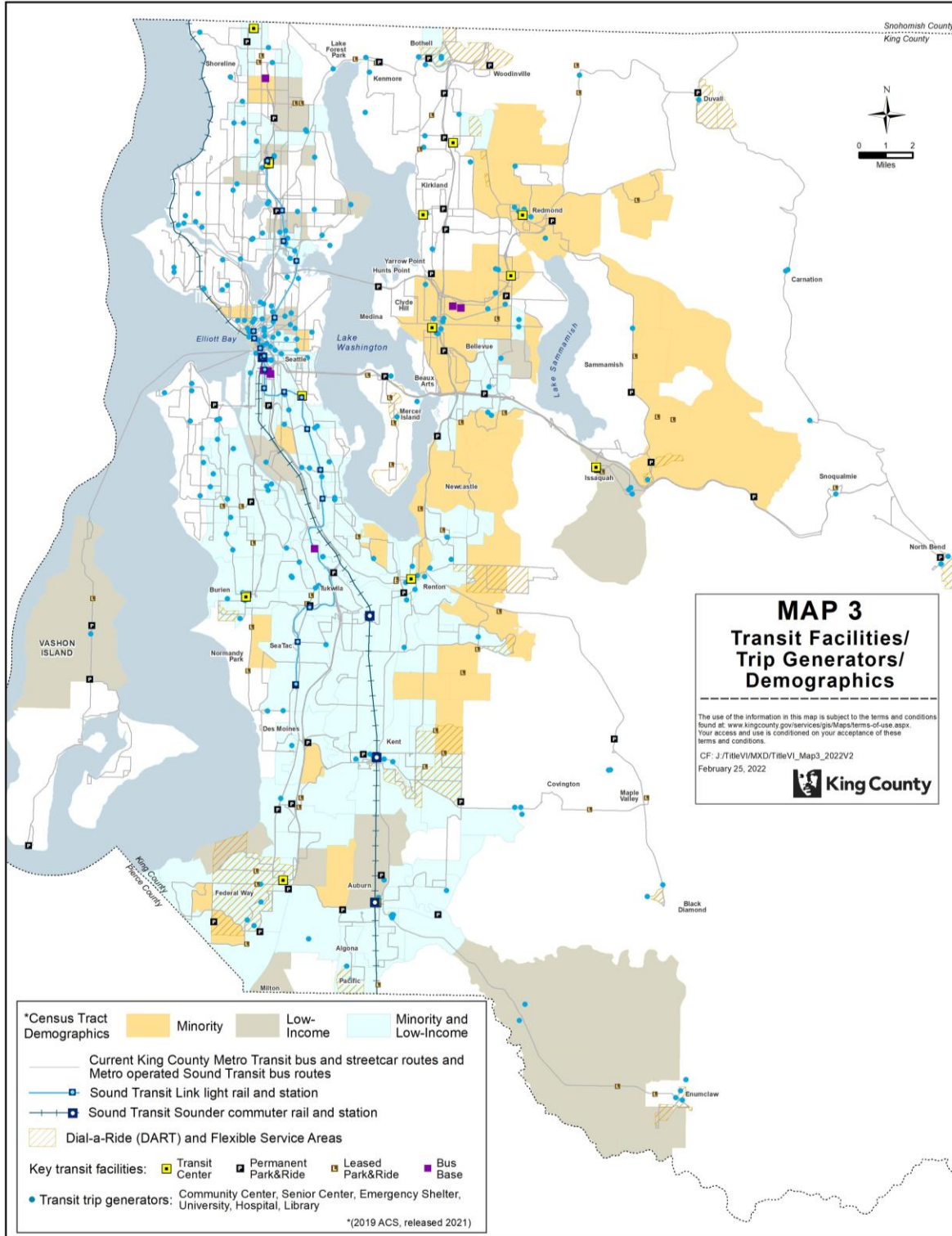
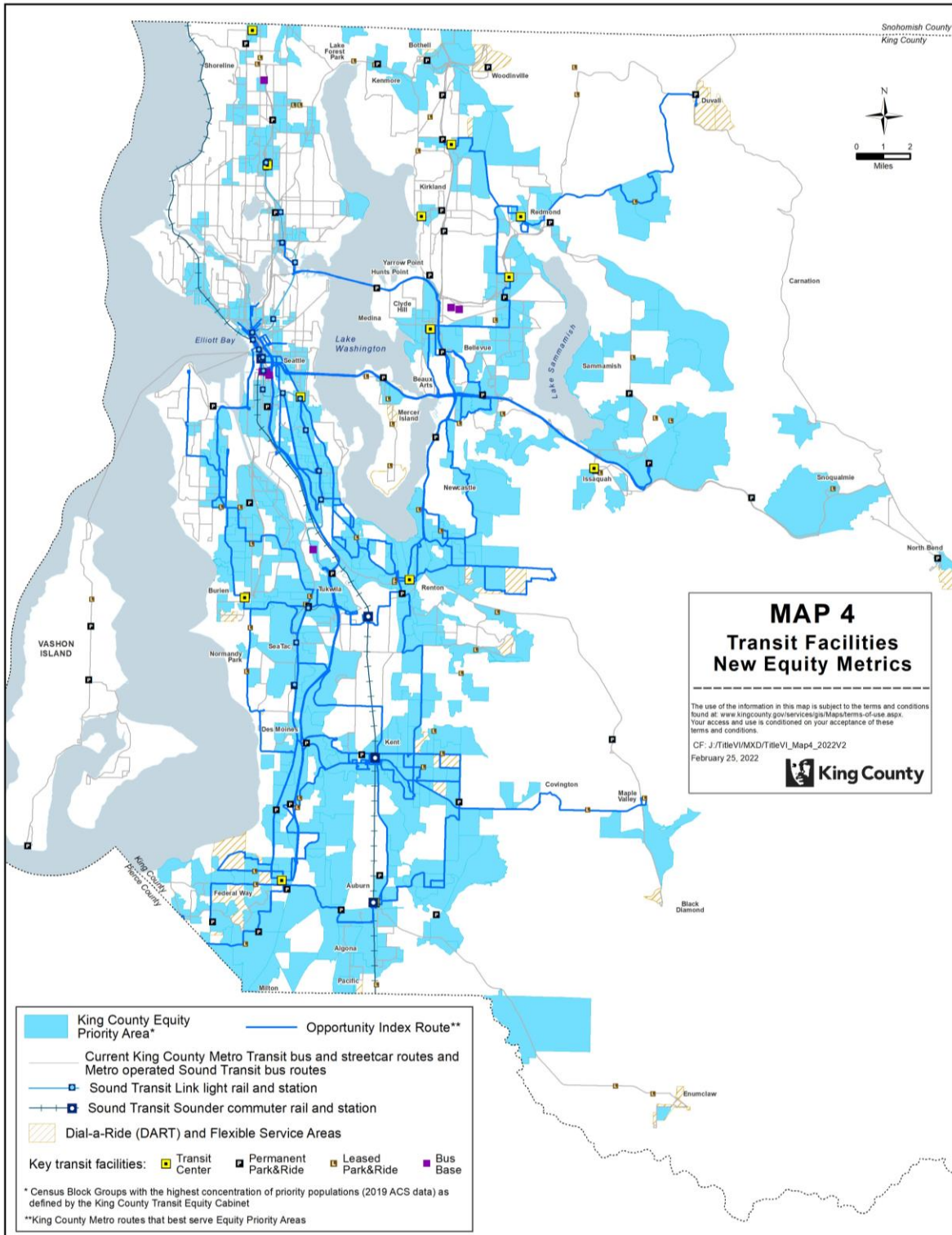


Figure 7 shows the locations of transit routes, stations, and facilities in relation to King County’s Equity Priority Areas (areas with Equity Priority Area Scores⁶⁷ of four or five).

⁶⁷ This is a combined weighted score measuring five population characteristics identified as “priority populations” in Metro’s policies – persons of color, poverty, limited English proficiency, disabled population, and foreign-born population. For each Census Block Group in King County, these 5 characteristics are measured and ranked 1 to 5 by quintiles (representing the total number of persons within each Census Block Group, within each category). Each score is combined using a weighting methodology (putting the most emphasis on race, then poverty) for a final score of 1 (low need) to 5 (high need).

Figure 7: Transit Facilities - New Equity Metrics - Map 4



Q. 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, Metro started 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 25 summarizes responses from the 2021 Rider/Non-Rider Survey⁶⁸. As the survey responses show, minority riders are more likely to use public transit for most or all of their transportation needs (43 percent of minority riders compared with 27 percent of non-minority riders), are more likely to use transit to/from work (56 percent minority, compared with 48 percent non-minority), and are equally likely to use transit for shopping/errands (12 percent compared with 12 percent), medical appointments (five percent compared with six percent), to/from school (four percent compared with two percent), and for all trips (four percent compared with four percent).

Table 25: Comparison of Minority to Non-Minority Responses (2021 Rider/Non-Rider Survey) - for those that use transit

Question	All Riders 1,018n	Minority 325n	Non-Minority 616n
Number of one-way trips in the last 30 days			
1 to 10	69%	62%	74%
11 to 20	13%	15%	12%
21 to 30	6%	5%	7%
31 to 40	8%	12%	5%
41 to 50	2%	3%	0%
51 to 60	1%	2%	0%
61+	1%	2%	0%
To what extent do you use the bus or streetcar to get around?			
Very little of your transportation needs	25%	22%	27%
Some of your transportation needs	41%	35%	46%
Most of your transportation needs	25%	29%	22%
All of your transportation needs	9%	14%	5%
Primary trip purpose when using transit			

⁶⁸ As of May 2022, the 2021 report was not yet finalized. It will be uploaded to the Metro website when it is.

Question	All Riders 1,018n	Minority 325n	Non- Minority 616n
To/from work	51%	56%	48%
Shopping/Errands	12%	12%	12%
Fun/Recreation/Social	13%	10%	16%
Medical appointments	5%	5%	6%
Special events	1%	1%	1%
Get to airport	1%	1%	1%
To/from school	3%	4%	2%
Business appointments	1%	1%	1%
To/from volunteering	1%	1%	1%
Church	0%	0%	0%
Social Services	0%	0%	0%
Jury duty	0%	0%	0%
Other appointments	1%	1%	1%
Judicial services/court	0%	0%	0%
Childcare	1%	2%	0%
Other	1%	1%	2%
Use for all trips	4%	4%	4%
No single primary purpose	4%	3%	5%

As Table 26 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 26: Satisfaction with Metro Transit - *for those that use transit*

Satisfaction with Metro	All Riders 1,018n	Minority 325n	Non- Minority 616n
Very satisfied	37%	38%	37%
Somewhat satisfied	54%	54%	55%
Somewhat dissatisfied	6%	5%	7%
Very dissatisfied	3%	3%	2%
Total satisfied	91%	92%	92%
Total dissatisfied	9%	8%	8%

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

Metro's Service Guidelines, which were last updated in 2021, 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 County Council's Mobility and Environment Committee reviewed the legislation and forwarded it to the full County Council. The Council followed a public notification and participation process, held a public hearing, and then adopted the updated Service Guidelines via Ordinance 19637. The Service Guidelines can be found in Appendix B.

Service and Fare Equity Analyses

The following summarizes service and fare equity analyses conducted for service or fare/fee changes implemented between July 2019 and June 2022.

- Service changes: March 2020, September 2020, September/October 2021, plus ongoing COVID-era suspensions between March 2020 and March 2021
- Fare changes: suspension and resumption of fare collection, related to COVID-19, from March to October 2020
- New parking fee: implemented in fall 2019 (note, analysis was not required under Title VI⁶⁹, but Metro conducted one as part of its commitment to advancing equity)

Service changes

The King County Council approved service changes for March 2020, September 2020, March 2020-2021 (ongoing COVID service suspensions), and September 2021, and. The March 2021 service change did not require King County Council approval because the only changes made were suspensions and investments under King County Executive authority. The March 2022 service change also did not require an ordinance. Table 27 summarizes the Title VI reports associated with each service change, also in Appendix K.

Table 27: Title VI Reports Associated with Each Service Change

Service change	Title VI Report
September 2019	N/A
March 2020	North Eastside Mobility Project (NEMP) Title VI. The NEMP service change improved mobility services in Bothell, Kirkland, Kenmore, Woodinville, and Redmond, and better integrated bus service with the new University of Washington Link light rail service.
September 2020	Renton Kent Auburn Area Mobility Plan (RKAAMP) Title VI. The RKAAMP service change prepared for the RapidRide I line, responded to changing mobility needs, and improved mobility and access for people who are communities experiencing historic or current underinvestment or inequities.

⁶⁹ 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.

Service change	Title VI Report
March 2020 - March 2021 (ongoing)	Covid-era suspensions Title VI reporting on period from March 2020-March 2021. This report focused on service changes and suspensions Metro made in response to the COVID-19 pandemic that had been in place one year. Note: this report met an FTA requirement for suspensions lasting over one year (was not required by the King County Council).
March 2021	N/A (Service change did not include ordinance changes, just suspensions and investments under Executive authority.)
September/October 2021	North Link Connections Mobility Project Title VI. The North Link service change focused on improving the transit network in north King County and better integrating with the opening of the three new Link light rail stations.
March 2022	N/A (did not require ordinance for service change)

Summary information about the service changes is shown in Table 23 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 in Appendix L. The ordinance numbers listed in Table 28 enable the reader to find the corresponding minutes. Because the equity analyses include descriptions of the service changes, and because the ordinances can be lengthy, the ordinances are not included as an appendix. Metro will provide them upon request, or they can be downloaded (using the ordinance number) from the King County Council's legislative archives⁷⁰. Links to the legislation and accompanying materials are also in the table below. The public engagement reports for each service change are in Appendix M.

Table 28: Summary of Adopted Service Changes, July 2019 - June 2022

Service Change	Date of Council Action	Ordinance Number	Areas Affected	Routes Affected
September 2019	<i>N/A – did not have ordinance for service change</i>			
March 2020	7/10/2019	18944 (link to materials)	Bothell, Kirkland, Kenmore, Woodinville, and Redmond, and better integrated bus service with the new University of Washington Link light rail service.	Routes 234, 235, 236, 238, 243, 244, 248, 255, 277, 930 and Sound Transit routes 540 and 541

⁷⁰ King County Council legislative archives [[LINK](#)]

Service Change	Date of Council Action	Ordinance Number	Areas Affected	Routes Affected
September 2020	4/28/2020	19097 (link to materials)	Renton, Kent, Auburn area	Routes 105, 148, 157, 158, 159, 164, 166, 168, 169, 180, 192, 906, 908, 910, 913, 914, 916, 917.
COVID-era suspensions: March 2020–March 2021	9/7/2021	Motion 15929 ⁷¹ (link to materials) <i>Did not have ordinance for service change</i>	King County	The fully suspended routes include routes 5X, 9X, 15X, 17X, 18X, 19X, 22, 29, 37, 47, 63, 71, 76, 77, 78, 113, 114, 116X, 118X, 119X, 121, 122, 123, 143, 154, 157, 167, 177, 178, 179, 190, 197, 200, 214, 216, 217, 219, 232, 237, 246, 249, 252, 268, 308, 312, 316, 342, 355, 628, 630, and 931. Other routes have had partial changes in service levels and those are reflected in the analysis as well. ⁷²
March 2021	<i>NA – did not have ordinance for service change</i>			
September/October 2021	5/4/2021	19280 (link to materials)	North Seattle and North King County (Seattle, Shoreline, Lake Forest Park, Kenmore, Bothell)	Routes 5X, 26, 31, 32, 43, 48, 63, 64, 71, 73, 74, 75, 76, 77, 78, 79, 301, 302, 303, 304, 308, 309, 312, 316, 320, 322, 355, and 373.
March 2022	<i>N/A – did not have ordinance for service change</i>			

⁷¹ Note: Motion corresponds to approval of Metro Transit COVID-19 response Title VI Service Equity Analysis report, not service change legislation

⁷² As of September 2021, these routes were suspended for one year or longer. Most of these routes were suspended starting in March 2020 due to decreased ridership and financial impacts during the COVID-19 pandemic. Route 628 was suspended beginning in June 2020 and Route 63 was suspended beginning in September 2020.

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 whole system. Should Metro find a disparate impact, consideration is given to modifying the proposed changes 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 whole system.

When evaluating the service changes implemented between 2019 and 2022, 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 2020 service change:** The proposed changes together affect 99 census tracts, including 16 minority-only census tracts, 11 low-income only census tracts, and 52 tracts which are both minority and low-income. There are two tracts experiencing a reduction in trips greater than 25 percent they are both minority and low-income tracts. Therefore, the analysis indicates that the proposed changes would place a disproportionate burden on low-income populations and have a disparate impact on minority populations. A detailed description of the impacts to residents in these two tracts are provided in Appendix K, along with the alternatives available to riders.
- **September 2021 service change:** The proposed changes together affect 89 census tracts, including two minority-only census tracts, 29 low-income only census tracts, and 19 tracts which are both minority and low-income. There are 11 tracts experiencing a reduction in trips greater than 25 percent, four are both low-income and minority, two are low-income only, and five are neither low-income nor minority tracts. The analysis indicates that the proposed changes would place a disproportionate burden on low-income populations but would not have a disparate impact on minority populations. A detailed description of the impacts to residents in the four low-income and minority tracts and two low-income only tracts experiencing a disproportionate burden, as well as alternatives, is available in Appendix K.

Fare Changes

Disparate impact or disproportionate burden. A fare change that results in a differential percentage difference 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 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 higher than the average fare increase for non-low-income riders, then the fare change would be determined to have a disproportionate burden.

Suspension of fare collection due to the COVID-19 pandemic. Metro’s only fare change between July 2019 and June 2022 was the temporary suspension of fare collection in 2020 due to the COVID-19 pandemic. In March 2020, Metro suspended the collection of all fares to protect operators and passengers from exposure to COVID-19. Because fares were eliminated for all riders on all routes throughout the system, no disparate impact on protected populations occurred, nor was there a disproportionate burden on low-income riders pursuant to the methodology by which Metro conducts fare equity analyses in accordance with Title VI.

Fare collection resumed on all routes in October 2020, when it was determined that adequate safety measures were in place and passenger capacity was lowered to 12 riders on 40-foot buses and 18 people on 60-foot buses. Rates of fare were the same as they were prior to the suspension of fare collection. Fare enforcement did not resume and paper transfers for cash riders became self-serviced instead of provided by the operator. A comparison of ridership from September (before fare collection resumed) to October 2020 (after fare collection resumed) among low-income routes, minority routes, and routes that are neither low-income nor minority, showed a change in ridership within 0.1 percentage points across all three route types, indicating that the resumption of fare collection did not result in a disparate impact on minority riders or a disproportionate burden on low-income riders.

Appendix N, “Title VI Analysis of Suspension and Resumption of Fare Collection,” includes more information.

Subsidized youth fares (pending change). In In 2022, the Washington State legislature passed, and the governor signed, “Move Ahead Washington,” which makes substantial funding available for transit agencies contingent on instituting a fare-free policy for riders 18 years of age and younger. As of April 2022, Metro is preparing to implement this policy, which includes preparing legislation for the King County Council and a Title VI analysis of its impacts.

Fee Changes

Parking Fee. Metro’s understanding is that parking permit fees are typically not considered transit fares during a service and fare equity analysis under Title VI. However, as part of its commitment to advancing equity, Metro chose to conduct an equivalent of this analysis to understand equity effects of the proposed pricing approach in June 2019. The analysis showed that the program as implemented in fall 2019, with pricing discounts for low-income customers, created no disparate impacts on minority populations nor disproportionate burdens on low-income populations. Appendix O, “Title VI analysis of Paid Permit Parking Program,” includes more information.

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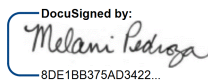
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