

## ATTACHMENT 2

### Title VI Analysis for Route Based Fares

#### **BACKGROUND**

Title VI policy requires analysis of proposed fare changes to identify disparate or disproportionate impacts to minority and low income populations. Disparate impact is defined as the adverse effect of a practice or standard that is neutral and non-discriminatory in its intention but, nonetheless, disproportionately affects individuals belonging to a particular group based on their age, ethnicity, gender or disability. If any such impacts exceed adopted thresholds, Title VI policy requires justification for the impacts, evaluation of lower impact alternatives and/or mitigation.

Although this proposal is not a fare change, the policy could impact how riders use Community Transit's fixed-route system and which fares they chose to pay.

#### **STATUS**

##### ***Proposal:***

Community Transit is evaluating the impacts of a fare policy change to implement route-based fares or one fare per service type: Local, South County Commuter and North County Commuter. Currently there are two de-facto zone fares:

1. The proposed change requires elimination of the "Local fare override" on trips taken on inter-county commuter routes, when the trip is entirely within Snohomish County. For example, a rider can board Route 421 (Marysville to downtown Seattle) and request the Local fare if they are traveling from Marysville to the Lynnwood Transit Center.
2. The proposed change also require elimination of the "South/Everett Commuter Fare Override" available on the North/East Commuter Routes 421, 422, 425 and 821 (\$5.50 fare). A lower (\$4.25) fare is currently available to customers who use these long-haul commuter routes only between south Snohomish County and King County. Customers who use these long-haul routes for shorter trips must request a "South/Everett Commuter Override" when boarding the bus in King County for the afternoon trips northbound.

##### ***Analysis:***

Based on the 2013 On-Board Rider Survey, there are only three commuter routes that met the minority classification (Routes 413, 821 and 855), and no commuter routes met the low-income classification. Ridership and fare payment analysis, concluded that less than 2% of Community Transit boardings on inter-county commuter routes included the Local Override option. On a per route basis, the range is from 0% to 5% of all boardings. For the North County commuter routes, with a stop at Lynnwood Transit Center, the South/Everett Commuter fare override accounts for 30% of fares. On a per route basis, the range is from less than 1% to 33% of all boardings.

The Title VI analysis studied whether customers who currently use inter-county commuter routes for local trips within Snohomish County would have a viable local route alternative under the new fare policy. An example is Route 412 that operates between Silver Firs and Seattle with a stop at McCollum Park: a trip between Silver Firs and McCollum Park can also be made taking local Route 109.

The analysis found that there are local route options (Swift, 100 and 200 series routes) to complete an in-county trip, at the local fare for all routes, except a portion of Route 416. The exception on Route 416 (Edmonds to Seattle) is a one-mile section on SR-104 that would be without a local service option,

requiring a rider to pay the full commuter fare. Route 416 is not a Title VI route (it has predominantly non-minority and non-low-income riders) and local-overrides represent 3% of the daily boardings.

The same analysis was completed for the North/East Commuter Routes 421, 422, 425 and 821 that stop at Lynnwood Transit Center, allowing for a South/Everett Commuter fare override. Based on April 2017 data, there is sufficient capacity for riders to chose another South/Everett Commuter Route or take Sound Transit. Both options allow customers to continue making trips from south Snohomish County to downtown Seattle or the University District without paying a higher fare.

### **CONCLUSION**

The Title VI analysis concluded that this fare policy change would not result in a disparate impact or disproportionate burden on Title VI populations.

**DATA & ANALYSIS**

- Title VI Route Analysis (2013 On Board Rider Survey)

Minority and Non-Minority Routes

Route	Minority	Non-Minority	Minority	Non-Minority	Minority Route?
402	113	277	28.97%	71.03%	No
405	25	77	24.51%	75.49%	No
410	51	105	32.69%	67.31%	No
412	32	107	23.02%	76.98%	No
413	149	229	39.42%	60.58%	Yes
415	92	195	32.06%	67.94%	No
416	21	76	21.65%	78.35%	No
417	32	62	34.04%	65.96%	No
435	14	39	26.42%	73.58%	No
810	3	12	20.00%	80.00%	No
855	40	34	54.05%	45.95%	Yes
860	18	53	25.35%	74.65%	No
871	33	76	30.28%	69.72%	No
880	15	28	34.88%	65.12%	No
421	58	156	27.10%	72.90%	No
422	15	55	21.43%	78.57%	No
424	7	22	24.14%	75.86%	No
425	32	98	24.62%	75.38%	No
821	20	31	39.22%	60.78%	Yes

Low-income and Non-Low-Income Routes

Route	Low-Income	Non Low-Income	Low-Income	Non Low-Income	Low-Income Route?
402	28	286	8.92%	91.08%	No
405	8	71	10.13%	89.87%	No
410	9	113	7.38%	92.62%	No
412	5	105	4.55%	95.45%	No
413	6	283	2.08%	97.92%	No
415	11	229	4.58%	95.42%	No
416	2	76	2.56%	97.44%	No
417	7	65	9.72%	90.28%	No
435	1	44	2.22%	97.78%	No
810	2	8	20.00%	80.00%	No
855	11	42	20.75%	79.25%	No
860	6	44	12.00%	88.00%	No
871	8	78	9.30%	90.70%	No
880	3	32	8.57%	91.43%	No
421	13	148	8.07%	91.93%	No

422	1	51	1.92%	98.08%	No
424		20		100.00%	No
425	5	91	5.21%	94.79%	No
821	10	32	23.81%	76.19%	No

- Community Transit operates 19 commuter routes. Only 2 of the commuter routes begin at a park & ride facility and then use a direct access ramps onto I-5, prohibiting local trips. Five of the routes (421, 422, 424, 425 and 821) provide morning and afternoon express service between north and east Snohomish County to south Snohomish County.

The following table illustrates the local service option for each commuter route being used for local service.

Route	Local Options
402	Not applicable – this route begins at LTC and uses the direct I-5 ramp
405	Swift and Route 101 on Hwy 99 + Route 119 on 220 <sup>th</sup> St SW
410	Routes 201 or 202 connecting Mariner P&R with Swamp Creek P&R Route 201 + Routes 120 or 112 connecting Mariner P&R to Mountlake Transit Center
412	Route 109 Silver Firs to McCollum P&R
413	Route 112 between 36 <sup>th</sup> Ave W and Ash Way P&R or Route 119 between 148 <sup>th</sup> St and Ash Way P&R Routes 112 or 119 between Ash Way P&R and Mountlake Terrace P&R
415	Same local alternative route option as Route 413
416	Route 130 between Edmonds Station to Mountlake Terrace Transit Center covers most of the same routing
417*	Route 113 operates in Mukilteo between the Mukilteo Ferry and Beverly Park Rd. Routes 113 + 119 between Mukilteo and Ash Way Park & Ride
421	Routes 201 or 202 connect Marysville with Lynnwood Transit Center
422	Route 240 + Routes 201 or 202 connect downtown Stanwood with Lynnwood Transit Center
424	Routes 270 and 271 connect the City of Snohomish with Monroe
425	Route 208 + Route 201 or Route 109 + Route 202: there are additional options that require 3 buses connecting Lake Stevens with Lynnwood Transit Center.
435	Routes 105 and 106 both connect Mill Creek with Canyon Park and Bothell Routes 105 + 115 + 119 connecting Bothell with Mountlake Terrace Transit Center Sound Transit also provides another alternative with Routes 535 + 512
810	Route 109 between McCollum Park and Mariner P&R and Ash Way P&R Route 115 or Routes 105+ 130 between McCollum Park and Lynnwood Transit Center Routes 115 + ST 512 between McCollum Park and Mountlake Terrace Transit Center
821	Same local alternative route option as Route 425
855	Not applicable – this route begins at LTC and uses the direct I-5 ramp
860	Same local alternative route option as Route 412
871	Route 115 or Route 115 + Route 202 or Route 105 + Route 120 – there are additional alternative connecting McCollum P&R with Mariner P&R and Ash Way P&R

880	Route 113 for Mukilteo Ferry Terminal to Beverly Park Road Route 115 + Route 130 or Route 116 + 130 – there are additional alternatives connecting Edmonds P&R to the Mountlake Terrace Transit Center.
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- Local routes (Swift, 100 and 200 series routes) run in both directions, all-day; where, as the Commuter routes (400 and 800 series) run during the AM and PM peak commutes and operate in one direction. In the morning, the bus run from destinations in Snohomish County south to King County; in the afternoon, the commute reverses and the buses operate from King County to destinations in Snohomish County.
- The following table provides the alternative South/Everett Commuter Routes that provide for the North/East Commuter Routes (421, 422, 424, 425 and 821) that currently stop at Lynnwood Transit Center and allow the South/Everett Commuter Override. The Table also illustrates available average daily seats available on the alternative routes at Lynnwood, based on April 2017 data.

Route	Average Daily Boardings with South County Commuter Override	South/Everett Commuter Route Alternative	Average Daily Available Capacity on 402 & 511
421	260	Routes 402 and Sound Transit 511	459
422	60	Routes 402 and Sound Transit 511	459
425	77	Routes 402 and Sound Transit 511	459
Sub Total	397		459
821	52	Route 855	104

- Rider impacts: less than an average of 2% of all Community Transit boardings include the Local Override option on commuter routes: the. The following table illustrates this information in three ways: A) by route, B) passenger type and fare payment, and C) average weekday boardings by route.

A) Route (September 2015 - August 2016):

Route	% Local Override	% South/Everett Commuter Override
<b>402</b>	0.00%	
<b>405</b>	0.39%	
<b>410</b>	2.12%	
<b>412</b>	1.40%	
<b>413</b>	1.20%	
<b>415</b>	2.19%	
<b>416</b>	1.57%	
<b>417*</b>	4.72%	
<b>421</b>	2.49%	32.73%
<b>422</b>	5.06%	32.05%

<b>424</b>	0.33%	0.48%
<b>425</b>	3.64%	33.43%
<b>435</b>	2.95%	
<b>810</b>	2.43%	
<b>821</b>	2.05%	23.48%
<b>855</b>	0.00%	
<b>860</b>	1.79%	
<b>871</b>	1.12%	
<b>880*</b>	5.50%	

\* The September 2016 Service Change removed the Lynnwood Transit Center stop on both Routes 417 and 880, further reducing the opportunity for riders to use the commuter routes as local in-county express service.

B) Products (September 2015 - August 2016):

	<b>Local Fare Override Rate</b>	<b>S. County Commuter Fare Override</b>
Cash	6%	Not Available
ORCA E-Purse	4%	28%
ORCA Monthly Pass	3%	32%
ORCA CT Passport*	10%	1%
ORCA Regional Passport	1%	27%

\* The CT Passport product is only available for Edmonds Community College and Everett Community College Transit Programs.

C) Average Daily Boardings by Route for Override vs. Total Boardings (October 2016, ORCA boardings):

<b>Route</b>	<b>ADB with Local Overrides</b>	<b>ADB with S/E Commuter Override</b>	<b>Total Average Daily Boardings</b>
402	0		1,394
405	4		244
410	16		540
412	9		939
413	25		1,675
415	29		1,309
416	7		238
417*	9		251
421	19	260	774
422	19	60	169
424	4	6	165
425	15	77	299
435	21		556
810	9		359
821	5	52	240
855	0		649
860	15		898

871	10		728
880*	49		674
Total	265		

\* Routes 417 and 880 no longer stop at Lynnwood Transit Center, eliminating the opportunity for direct connections between Mukilteo and Lynnwood via commuter routes

- Capacity Analysis for South/Everett Commuter Route Alternatives for Routes 421, 422, 425 and 821 (April 2017 APTS data).

Scheduled Vehicle Type	Actual Average Capacity	AVG. Max Load	Highest Max Load	Available Seats at LTC	Max Load-to-Actual Seat Ratio
DBT	77	46	58	30.6	60.1%
DBT	77	46	62	30.3	60.4%
DBT	76	58	70	18.1	76.3%
DBT	77	53	83	23.7	69.1%
DBT	77	54	70	23.0	70.0%
DBT	75	41	65	34.5	54.3%
DBT	76	57	73	19.1	75.0%
DBT	77	56	68	20.4	73.4%
DBT	77	56	83	20.9	72.8%
DBT	75	57	90	18.0	76.1%
DBT	77	46	63	30.4	60.3%
DBT	76	46	62	30.4	60.2%
<b>916</b>		<b>617</b>		<b>299</b>	

Route	Scheduled Arrival Time LTC	Trip #	Scheduled Vehicle Type	Actual Average Capacity	AVG. Max Departure Load at LTC	Max Departure Load at LTC (April 2017)	Available Seats at LTC	Max Load-to-Actual Seat Ratio
511	5:08 AM	25064	STA	56	46	55	10.4	81.5%
511	5:28 AM	25065	STA	56	54	73	1.7	97.0%
511	5:48 AM	25066	SDD	69	58	75	10.8	84.3%
511	6:04 AM	25067	SDD	82	55	70	27.3	66.7%
511	6:20 AM	25068	STA	56	47	59	9.4	83.3%
511	6:35 AM	25069	SDD	73	39	50	34.0	53.4%
511	6:49 AM	25070	STA	56	36	48	19.9	64.6%
511	7:04 AM	25071	SDD	78	35	52	42.8	45.2%
511	7:20 AM	25072	SDD	69	34	57	35.5	48.8%
<b>TOTALS:</b>				<b>595</b>	<b>404</b>		<b>192</b>	

Route	Sched. start	Trip	Scheduled Vehicle Type	Scheduled Seating Capacity	AVG. Max Load (zero values excluded)	Max Load-to-Actual Seat Ratio	
855	5:51	22296	ART	58	<b>52.0</b>	89.8%	6.0
855	6:20	22297	ART	58	<b>38.7</b>	66.9%	19.3
855	6:37	22298	ART	58	<b>30.6</b>	52.8%	27.5
855	7:03	22299	ART	58	<b>26.4</b>	45.8%	31.6
855	7:18	22300	ART	58	<b>38.1</b>	66.1%	20.0
TOTALS:				290	185.7		104.3