

Title VI Review of King County Metro’s Proposed 2018 Fare Simplification - \$2.75 Adult Fare

FTA Circular 4702.1B, issued on October 1, 2012, identifies “Title VI Requirements and Guidelines for Federal Transit Administration Recipients.” The following sections outline requirements with regards to evaluating proposed fare changes.

7. REQUIREMENT TO EVALUATE SERVICE AND FARE CHANGES. This requirement applies only to transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population or that otherwise meet the threshold in the Introduction section of this chapter. These transit providers are required to prepare **and submit service and fare equity analyses** as described below. Transit providers not subject to this requirement are responsible for complying with the DOT Title VI regulations which **prohibit disparate** impact discrimination, and therefore should review their policies and practices to ensure their service and fare changes do not result in disparate impacts on the basis of race, color, or national origin. (Page IV-11)....

Upon completion of a service or fare equity analysis, the transit provider shall brief its **board of directors, top executive, or appropriate governing entity or official(s)** responsible for policy decisions regarding the service and/or fare change(s) and the equity impacts of the service and/or fare change(s). The transit provider shall submit documentation such as a board resolution, copy of meeting minutes, or similar documentation with the Title VI Program as evidence of the board or governing entity or official’s consideration, awareness, and approval of the analysis. (Page IV-12)

b. Fare Equity Analysis

(1) Fare Changes. The fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease. As with the service equity analysis, FTA requires transit providers to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations....

(2) Data Analysis. For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, the transit provider shall analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment mediate that would be subject to the fare change. (Page IV-19)

The 2016 King County Metro Transit Title VI Program Report submitted and approved by the King County Council (Motion No. 14688) and submitted to and accepted by the Federal Transit Administration (FTA concurrence posted electronically on TrAMS, April 11, 2017) outlines the methodology by which Metro conducts fare equity analyses pursuant to the FTA's Title VI regulations.

The first step is a threshold analysis to determine whether a proposed fare change includes a change in the fare structure or a change in fares by fare payment type. If a proposed fare change involves an equal fare increase across all customer categories and an equal increase across all fare payment methods then the proposed change will not have a disparate impact or disproportionate burden and does not require further analysis. The current fare proposal does involve differential fare changes by customer category and therefore requires further analysis.

As described in King County Metro's Services Guidelines, adopted by King County Council Ordinance 18301, Metro uses census tract demographics and boardings to classify routes as low-income, minority, or both. A census tract is low-income if the percent of the population in that tract that is low income (at or below 200% of the Federal Poverty Level) is greater than the average in King County (23.9%). A census tract is minority if the percent of the population in that tract that is minority is greater than the average in King County (37.2%). Minority and low-income census tracts are shown in Figure A-1.

Similarly, routes with a higher percentage of boardings in low-income or minority census tracts than Metro's corresponding system averages are defined as low-income or minority routes. Figure A-2 shows Metro's minority and low-income routes.

To assess the equity impacts of this fare proposal, Transit first estimated boardings by full-fare adult riders paying with cash, E-purse or retail passes on low-income, non-low-income, minority and non-minority routes. (Boardings made with employer-provided Passport passes were excluded from this analysis, as were boardings by ORCA LIFT, Youth and Senior/Disabled riders since these customers are not directly affected by this proposed fare change.) We then calculated and compared the average fare paid by full-fare adult riders on low-income routes with non-low-income routes, and by full-fare adult riders on minority routes with non-minority routes.

Under Metro's current fare structure, the average fare paid by full-fare adult riders (without employer provided passes) on low-income routes is slightly higher (two cents) than the average full adult fare paid by riders on non-low-income routes. Similarly, the average fare paid by full-fare adult riders on minority routes is somewhat higher (five cents) than the average full adult fare paid by riders on non-minority routes.

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

Figure A-1: Minority and Low-Income Census Tracts

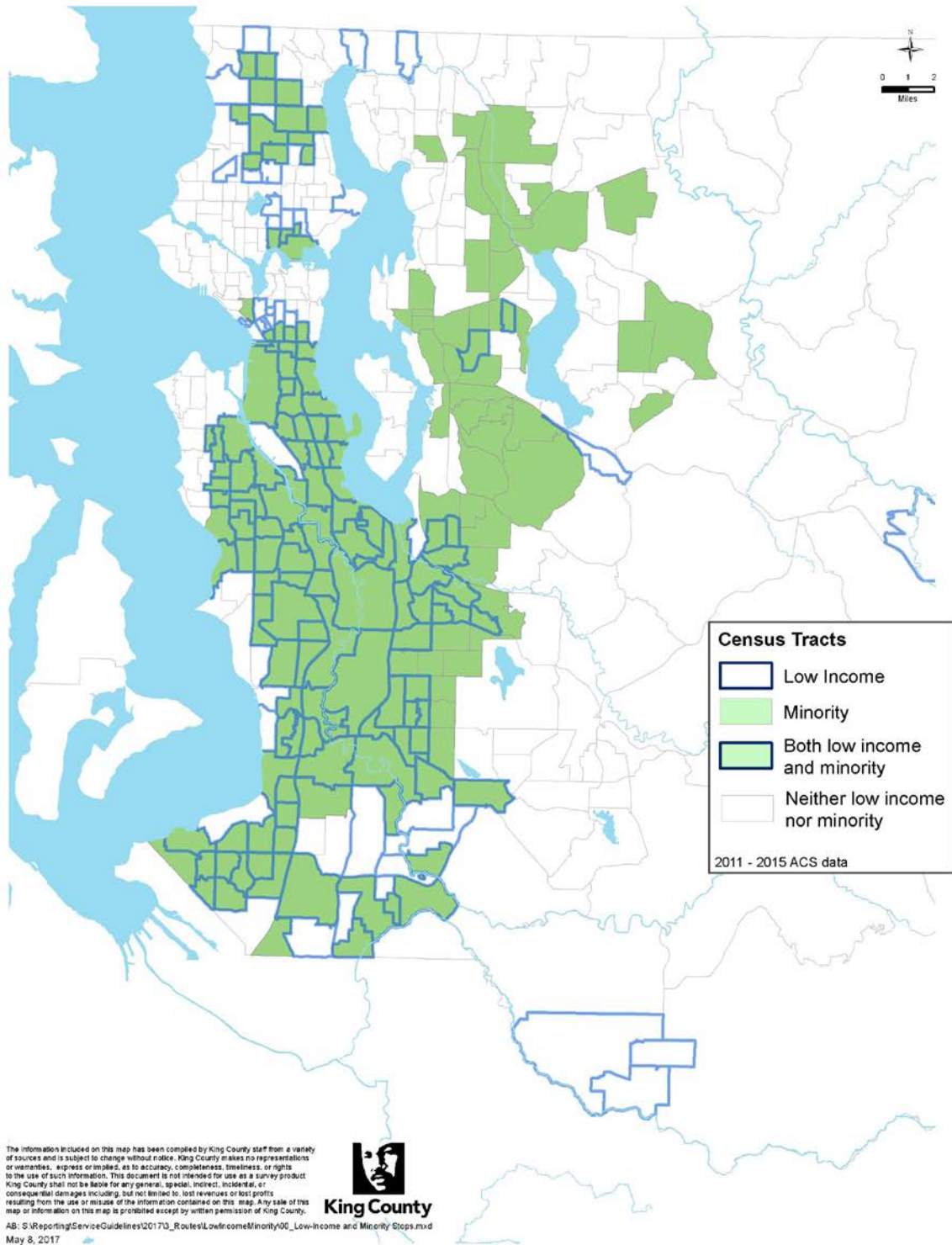


Figure A-2: Metro’s Title VI Low-Income and Minority Routes

