



Agenda Item No. (4)

To: Transportation Committee/Committee of the Whole
Meeting of July 25, 2019

From: Ron Downing, Director of Planning
Mona Babauta, Deputy General Manager, Bus Division
Denis J. Mulligan, General Manager

Subject: **APPROVE ACTIONS RELATIVE TO GOLDEN GATE TRANSIT
COMMUTE ROUTES IN CENTRAL AND NORTHERN MARIN COUNTY,
APPROVAL OF THE TITLE VI EQUITY ANALYSIS AND AUTHORIZE
FILING A NOTICE OF EXEMPTION UNDER CEQA**

Recommendation

The Transportation Committee recommends that the Board of Directors approve actions relative to Golden Gate Transit commute routes in Central and Northern Marin County as follows:

1. Sir Francis Drake Corridor: add one evening trip on Route 24, modify Route 24X to provide non-stop service between the College of Marin and Golden Gate Bridge Toll Plaza and adjust service levels, and discontinue Route 27 between Sleepy Hollow and the San Anselmo Hub;
2. Marinwood, Lucas Valley, and Novato: discontinue Route 44, extend Route 38 from Terra Linda to Marinwood and add one afternoon trip, provide service to Lucas Valley on new Route 38A, adjust Route 54 service levels at bus pads in the San Rafael area, terminate Routes 54 and 54C in central Novato, replace Route 56 with Route 56X and increase service levels, and add an afternoon trip on Route 58;
3. Approve the attached Title VI equity analysis; and,
4. File a Notice of Exemption under the California Environmental Quality Act.

This matter will be presented to the Board at its July 26, 2019, meeting for appropriate action. If approved by the Board, the effective date of these changes would be Monday, December 9, 2019. Attached are the proposed schedules and maps associated with this recommendation.

Background

In April 2019, the Golden Gate Bridge, Highway and Transportation District's (District) Board of Directors (Board) approved the setting of a public hearing in June to gather public input on proposed changes to Golden Gate Transit commute routes in Central and Northern Marin County. The proposal included the following components:

- Sir Francis Drake Corridor:
 - Replace peak trips on Route 24 with new Route 24A, which would operate between the College of Marin and San Francisco Financial District with service every 20 minutes;
 - Increase peak service on Route 24X to every 20 minutes, and operate service non-stop between the College of Marin and Golden Gate Bridge Toll Plaza; and,
 - Discontinue Route 27 between Sleepy Hollow and the San Anselmo Hub.
- Marinwood, Lucas Valley, and Novato:
 - Discontinue Route 44, which provides commute service from Lucas Valley and Marinwood to the San Francisco Financial District;
 - Extend Route 38 from Terra Linda to Marinwood, eliminating service along Del Ganado Road and providing replacement service in Marinwood but not Lucas Valley for current Route 44 customers;
 - Discontinue Route 54 service at bus pads in the San Rafael area, which provide service outside of times currently served by Routes 44 and 58;
 - Terminate Routes 54 and 54C in central Novato, eliminating service in San Marin that is duplicative of Route 56;
 - Replace Route 56 with Route 56X and increase service levels to offer a similar service frequency and span as Route 54; and,
 - Add an afternoon trip on Route 58 to match the service span as current Route 44 at bus pads in the San Rafael area.

These recommendations were made based on several factors, including:

- Declining ridership on Routes 44 and 58, neither of which meet the District's ridership standard of 20 passengers per trip on average;
- An imbalance of passenger loads on Routes 24 and 24X, especially in the afternoon when Route 24X carries many more passengers than Route 24 during overlapping hours of operation; and,
- The continued poor performance of the Sleepy Hollow portion of Route 27, which does not meet the District's ridership standard of 10 passengers per trip on average.

The District's *Rules of the Board* and Title VI Policies call for a public hearing to be held when discontinuation of a route is proposed. Therefore, the required public hearing was held on June 20, 2019, in the Board Room of the Toll Plaza Administration Building in San Francisco. The hearing was preceded by the appropriate outreach activities, including staff-led workshops in Marinwood, San Marin, and San Anselmo to gather direct feedback from Golden Gate Transit customers. Members of the public who could not attend the public hearing or outreach sessions were able to submit comments in writing, either electronically or through the mail.

Modifications to the Original Proposal

Through this public hearing process, the District received 197 individual comments from members of the public. Of these, 123 expressed opposition to the proposal, 17 were in favor of the proposal, and 57 were neither in support of or opposed to the proposal. Of the 57 comments that did not support or oppose the proposal, 47 expressed concerns about aspects of Golden Gate Transit service on the affected routes.

Based on extensive public feedback and requests, District staff reassessed the proposal to be responsive to the requests of bus riders while being conscious of the factors that influenced the proposal. As a result, the proposal has been revised as follows:

- Sir Francis Drake Corridor:
 - The concept to create Route 24A coupled with increased service levels on Route 24X is discarded, and instead one evening trip will be added on Route 24. Passengers expressed concern for more frequent service and a wider span of service, even if it results in a slightly longer travel time. Passengers specifically requested a greater span of service in order to meet family obligations.
 - Trips on Routes 24 and 24X would be re-spaced, and the non-stop service area on Route 24X would be expanded as proposed, to better balance passenger loads between buses.
- Marinwood, Lucas Valley, and Novato:
 - An afternoon trip would be added to Route 38, expanding service to five trips in each direction. Three of the five trips in each direction would continue to serve Del Ganado Road in Terra Linda. The other two trips per direction, which would be designated Route 38A, would extend to Lucas Valley to provide partial replacement service for Route 44.
 - Route 54 service to the Marinwood, Lucas Valley, Terra Linda, and North San Pedro Road Bus Pads would not be eliminated. Instead northbound Route 54 service to these bus pads would be reduced. This would maintain the existing service span (earliest and latest trips) while speeding up the remaining trips to Novato, which can utilize the carpool lanes in this area.

The modified proposal would continue with the proposed discontinuation of Sleepy Hollow service on Route 27, modifications to the alignment of Routes 54 and 54C in Novato, and enhancements to Route 56X and 58.

Several comments requested another reprieve for Sleepy Hollow service. This segment of the Route 27 typically carries five passengers on the one morning trip, while the one evening trip typically has only one passenger, so continuation of the service is not justified. Instead, it is recommended that Marin Transit be approached to provide service in a manner that would better meet the needs of this community.

Comments on the proposed changes to Routes 54, 54C, and 56X were mostly positive, and no further changes to the proposal are warranted for these routes. All components of the revised proposal would be monitored for effectiveness once implemented.

Title VI Impacts

Federal Transit Administration regulations and guidance implementing Title VI of the Civil Rights Act of 1964 require an equity analysis be performed in the case of a major service change. The District's Title VI Policies define a major service change as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Since canceling Route 44 constitutes a major service change, staff conducted an equity analysis to determine whether canceling Route 44 would result in a disparate impact to minority populations or impose a disproportionate burden on low-income populations in the District's service area. None of the other parts of the proposal constitutes a major service change. The analysis examined demographic data from the District's bus service and on Route 44 itself.

Overall, the analysis concludes that the proposed elimination of Route 44 does not constitute a disproportionate burden on low-income riders or a disparate impact on minority riders. The complete Title VI equity analysis is set forth in Appendix A.

CEQA Findings

It is recommended that the Board authorize staff to file a Notice of Exemption under the California Environmental Quality Act (CEQA) for the discontinuance of Route 44. Alternate service will be offered by other Golden Gate Transit bus routes and Route 44 ridership is low, so it is anticipated that there will be little or no impact on traffic along the U.S. 101 Golden Gate Corridor. While some passengers might choose to drive, it is expected that the diversion of current riders to driving would be minimal. Accordingly, there is no possibility that the discontinuance of Route 44 will have a significant effect on the environment. 14 Cal. Code Regs. § 15601(b)(3). Thus, the discontinuance of Route 44 is exempt from CEQA. If approved by the Board, staff will file a Notice of Exemption for the discontinuance of Route 44 with the City and County of San Francisco and County of Marin.

Public Notification

Outreach on the proposal occurred during the months of April, May, and June 2019. Public notification activities included:

- Three public workshops were held: in Marinwood on May 8, in Novato on May 11, and in San Anselmo on May 18.
- A Notice of Public Hearing was posted to the District's website on May 30.
- Legal notices were published in the *San Francisco Examiner* on Sunday, May 26, and Sunday, June 9; in the *Marin Independent Journal* and *San Francisco Chronicle* on Tuesday, May 28, and Tuesday, June 11; and, in the *Pacific Sun* on Wednesday, May 29, and Wednesday, June 12.
- Advertisements were placed in local publications for April and May (*Marin Independent Journal*, *Pacific Sun*, and *La Voz*).

- Posters on board buses advertising the public meetings were posted for the weeks of April 29, May 6, May 13, and May 28.
- Direct outreach to passengers was done on Routes 24, 24X, 27 (Sleepy Hollow segment only), 38, 44, 54, 56, and 58.
- Web News item and Press Release to local media posted on May 1.
- Social media postings on Facebook and Twitter May 2, May 7-9, May 11, May 15-16, May 18, May 21, June 10, and June 18.
- Email blast to customers and community-based organizations sent on May 1, May 7, May 15, and June 18.
- A public discussion held as part of the regularly scheduled Bus Passengers Advisory Committee (BPAC) meeting on Wednesday, May 15, at 6:00 p.m.
- A public hearing held in the Board Room, Golden Gate Bridge Toll Plaza, on Thursday, June 20, at 9:00 a.m.

Translation of all printed materials and handouts in Spanish were available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal could have been submitted in several different ways:

1. Attend a meeting or hearing and comment directly;
2. E-mail publichearing@goldengate.org ;and/or,
3. Send written comments to the District Secretary.

All comments were considered without regard to the manner in which the comments were submitted. Therefore, individuals did not have to attend the public hearing and provide testimony in person if they had commented through e-mail or written forms. All comments received through the above methods were considered in the final recommendation. Comments were accepted through 4:30 p.m. on Friday, June 21, 2019. The public hearing was held on June 20, 2019, at 9:00 a.m. in the Board Room, Administration Building at the Golden Gate Bridge Toll Plaza, San Francisco, CA.

A total of 197 comments were received, including a letter from the Bus Passengers Advisory Committee. A summary of the comments and staff responses is contained in Appendix B.

Fiscal Impact

The total annualized additional cost to implement this proposal is approximately \$333,000. That amount would be fully offset primarily by utilizing resources currently dedicated to Route 31, which will be discontinued due to the opening of SMART's Larkspur extension in December 2019, and by redeploying two trips from other commute routes that are underperforming to this service package. Therefore, there will no budgetary impact to implement this proposal.

Attachments: Appendix A – Title VI Equity Analysis
Appendix B – Staff Responses to Public Comments
Appendix C – Proposed Schedules
Appendix D – Maps of Existing Conditions and Proposed Service Changes

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Appendix A
Title VI Equity Analysis: Cancel Route 44 and Replace with Extended Routes 38 and 58
Service

Presented to the Golden Gate Bridge, Highway and Transportation District
Transportation Committee
July 25, 2019

I. Introduction

Staff is currently proposing to eliminate Golden Gate Transit (GGT) Route 44, which provides commuter service from Lucas Valley and Marinwood to the San Francisco Financial District, due to low ridership. As cancellation of the Route 44 would constitute a major service change, before taking any action, the Board of Directors (Board) must first consider whether it would disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area as described in to FTA Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients"), implementing Title VI of the Civil Rights Act of 1964, and the District's Title VI Policies.

This equity analysis indicates that the proposed cancellation of Route 44 will not have disparate adverse impacts on minority riders or disproportionately burden low-income riders because the proportion of minority and low-income riders on Route 44 is lower than in the ridership of GGT as a whole.

Staff is also proposing changes on Routes 24, 24X, 38, 54, 54C, 56, and 58 at the same time, but none of these changes amounts to 25% of the revenue miles on any of the routes, so no equity analysis of these changes is required.

II. Title VI Policies

The Golden Gate Bridge, Highway & Transportation District (District) adopted its Major Service Change, Disparate Impact and Disproportionate Burden Policies (together referred to as "Title VI Policies") on August 9, 2013. These policies set forth the standards used in service equity analyses. The District's Major Service Change Policy reads in relevant part:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

The following are exemptions to the policy:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered "major" unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered "major," as long as the service will be/has been operated for no more than twelve months.

- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The District’s Disparate Impact policy provides:

- The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The District’s Disproportionate Burden Policy provides:

- The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

Public Outreach

Prior to Board adoption of the District’s Title VI Policies, public outreach regarding the policy proposals included:

- Informational meetings on July 8, 9 and 10, 2013, in Marin County, Novato and Rohnert Park, respectively, between 4:30 p.m. and 6:30 p.m.
- Legal notices published in the *Marin Independent Journal*, the *San Francisco Examiner* and the *Santa Rosa Press Democrat* on June 18 and 25, 2013
- Signage posted onboard the ferryboats, at the Ferry Terminals, at transit hubs in Marin and Sonoma counties, at major bus stops and at the Customer Service Center at the San Rafael Transit Center
- Display boards, staff report and comment forms, including Spanish translations
- A press release issued and posted to the District’s web site on June 17, 2013, including links to the staff report in both English and Spanish
- A public hearing agenda and an associated staff report posted to the District’s web site on July 8, 2013
- Information e-blasted to the Bus and Ferry Subscriber’s list on June 20 and July 2, 2013
- Information posted to transit-specific social media channels on July 2 and July 8, 2013
- A public hearing agenda mailed to organizations and individuals on the District’s mailing list on July 8, 2013, and posted on District bulletin boards.

Comments Received

Of the comments received by the District, one alerted the District to the need to apply Title VI principles to the allocation of resources between bus and ferry services; one commented on the inconvenience of the time and location of the public hearing, service reliability, and driver

attitudes; and another urged the District to reach out to community partners and agencies to get the word out about Title VI-related public hearings.

The resolution evidencing the Board's discussion and approval of the policies is attached as Exhibit A.

III. Golden Gate Transit Bus Services

GGT Bus Services are generally delineated as "Commute" and "Basic." Generally, "Commute" bus service is weekday, peak-period, one-directional service between Sonoma or Marin County to/from San Francisco, plus shuttle-type routes designed specifically to take passengers from their places of origin to/from the primary Commute routes. "Basic" bus service, on the other hand, operates seven days a week over most of the day/night to provide basic mobility throughout the District's service area. More specifically:

- *Transbay Commute Service* provides commute service during morning and afternoon peak-hour periods. Commute routes operate Monday through Friday, except designated holidays, and serve San Francisco, Marin, and Sonoma counties. Commute routes include Routes 2, 4, 4C, 8, 18, 24, 24C, 24X, 27, 38, 44, 54, 54C, 56, 58, 72, 72X, 74, 76, 92, and 101X. If the proposed service changes are approved, then Route 44 will be eliminated, Route 24A will be added, and Route 56X will replace Route 56.
- *Transbay Basic Service* provides daily service throughout the day and evening between San Francisco, Marin, Sonoma, and Contra Costa counties. Basic routes include Routes 30, 40, 40X, 70, and 101. Route 101 receives moderate funding from the MTC's Regional Express Bus (REB) program.

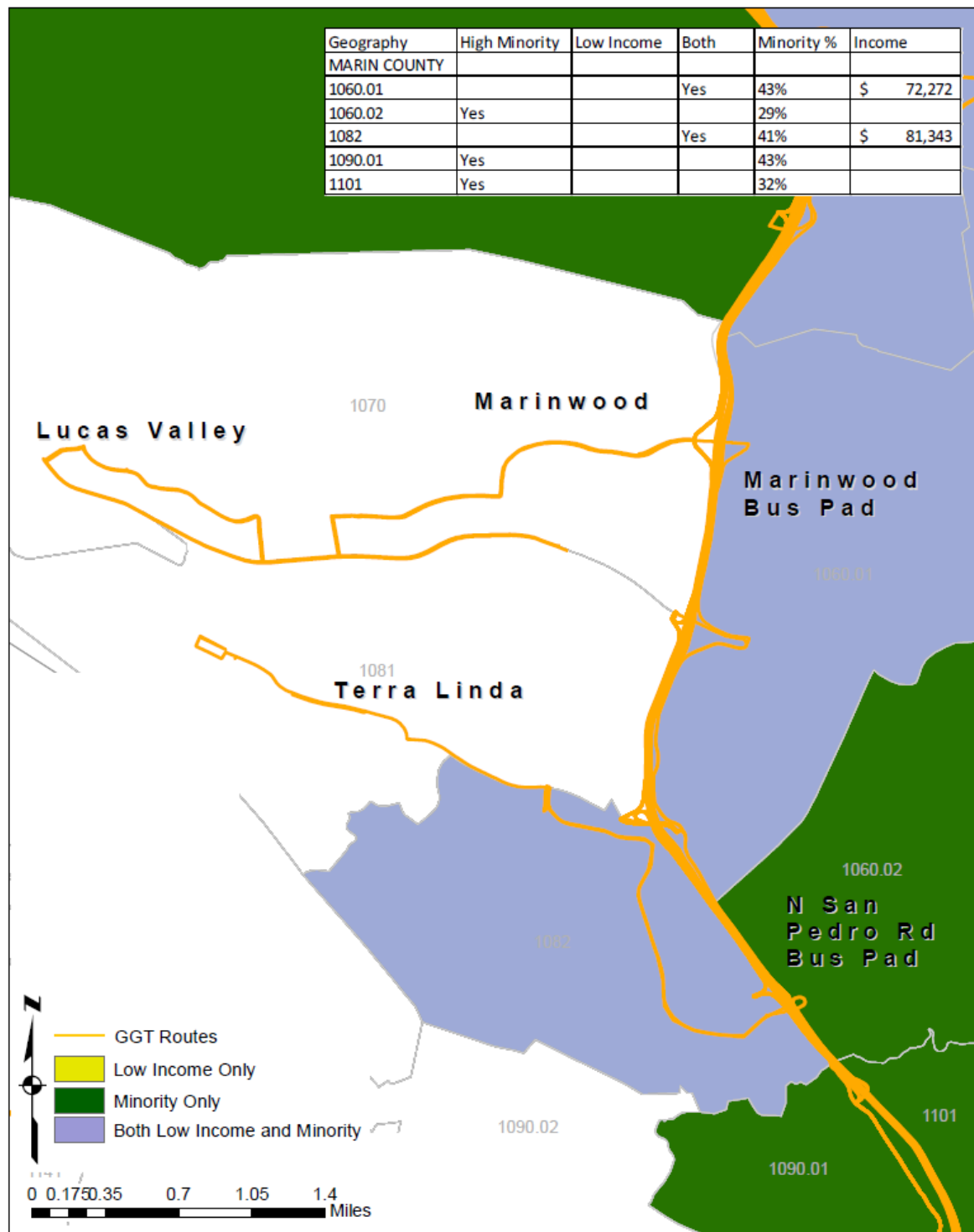
IV. Route 44 Cancellation, Purpose and Public Outreach

At the inception of Golden Gate Transit commute service, service from Lucas Valley and Marinwood was provided during one hour in the morning and evening peaks on Route 40. The service expanded slightly in 1981 with rising ridership. This level of service continued through July 1992, when the route number was changed to 44 to accommodate the new basic service Route 40 over the Richmond-San Rafael Bridge. Service was extended to earlier in the morning in June 1993 then was cut back again in March 1995. At that time there were five morning trips and four evening trips. Morning service was reduced by one trip again in June 2007 due to decreasing ridership. Then, in Fall 2010, after staff proposed canceling the entire route, residents and riders protested, and service was reduced to two morning and two evening trips. Ridership held steady or even improved from 2010 through early 2018 at around 2,000 patrons monthly, but then began dropping again in June 2018 and is currently between 1,000 and 1,500 patrons per month.

The current proposal would eliminate Route 44 entirely. Resources used by Route 44 can be deployed more effectively to services with higher demand.

Map 1**ROUTE 38 & 44 GGT SERVICE AREA**

Source: ACS Census 2013-2017. Tables S1903 & B03002.

***Public Notification and Comment***

Outreach on the proposal occurred during the months of April and May 2019. Public notification activities included:

- A public workshop was held at the Marinwood Community Center on May 8.
- A Notice of Public Hearing was posted to the District's website on May 30, 2019.
- Legal notices were published in the San Francisco Examiner on Sunday, May 26, and Sunday, June 9; in the Marin Independent Journal and San Francisco Chronicle on Tuesday, May 28, and Tuesday, June 11; and, in the Pacific Sun on Wednesday, May 29, and Wednesday, June 12.
- Advertisements were placed in local publications (Marin Independent Journal, Pacific Sun and La Voz).
- Posters were displayed on board buses advertising the public meetings.
- Seat drops were done on all Routes 44 trips.
- Press release was sent to local media and an article was written and ran in the Marin Independent Journal.
- Social media postings on Facebook and Twitter.
- Email blast to customers and community-based organizations.
- Information was posted and featured on the District's website.
- Translation of all printed materials and handouts in Spanish were available, per the District's Limited English Proficiency (LEP) plan.
- Translation of all printed materials and handouts in Spanish was available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal could be submitted in several different ways:

1. In person at a public meeting or hearing;
2. By e-mail to publichearing@goldengate.org; and/or,
3. In writing to the District Secretary.

The District's practice is to treat all comments equally without regard to the manner in which the comments are submitted or received. Therefore, individuals need not attend the public hearing and provide testimony in person if they have commented through e-mail or written forms. All comments received through the above methods were considered in the final recommendation. Comments were accepted through 4:30 p.m. on June 21, 2019.

Through the public comment and public hearing process, the District received 197 individual comments from members of the public, many of which were in opposition to the proposal. 17 of these comments requested the District keep Route 44 service in Lucas Valley.

V. Title VI Equity Analysis for the elimination of Route 44

The elimination of Route 44 is considered a Major Service Change based on the District's Major Service Change Policy because it is a reduction in service of more than 25% on Route 44. Because of this, an Equity Analysis is required to determine whether this change will result in a disparate impact to minority populations or a disproportionate burden on low income populations, based on the District's Title VI Policies.

The current proposal also includes changes to Routes 24, 24X, 38, 54, 54C, 56, and 58. In particular, changes to Route 38 and 58 will mitigate the impacts of the Route 44 cancellation. Lucas Valley and Marinwood riders would be offered continued service on the Route 38, which will be extended north via Lucas Valley Road to Miller Creek Road in Marinwood and on the Route 58, which will provide expanded service to the bus pads at Marinwood, Lucas Valley, Terra Linda, and North San Pedro Road. In addition, in response to public comment, some bus pad service on Route 54 will be retained. The cancellation is proposed to be effective December 9, 2019. No other component of the current proposal constitutes a Major Service Change, as none of these changes amounts to 25% of the revenue miles on any of the routes.

When the changes to Routes 44, 38 and 58 are viewed together, current riders will have the same frequency of service as previously, but some will have to walk to a more distant stop to access service. Lucas Valley residents who ride will have a longer ride, of approximately ten additional minutes.

A. *Equity Analysis Methodology*

The FTA Circular states that for elimination of a route, the appropriate comparison population is the ridership of the affected route as compared to the ridership of the system as a whole. For purposes of analyzing the equity implications of eliminating Route 44, Staff compared ridership on Route 44 to ridership on all GGT bus routes. All data was derived from the District's 2018 system-wide passenger survey.

For the purpose of the disproportionate burden analysis, Staff determined riders with a household income of less than \$75,000 per year to be low income. While the FTA Circular defines low income with reference to the federal poverty guidelines, federal poverty standards are under-inclusive for an area where the cost of living is so much higher than most localities. To compare, in 2015, the California State Income Limits that are used to determine eligibility for low-cost housing and other programs gave a range of \$65,700 for a single-person household to \$123,000 for an 8-person household for the “low income” designation for Marin County (there are also “very low income” and “extremely low income” categories). Marin County, where Route 44 riders reside, has a comparatively high median income (\$97,815, from the 2012-2016 American Community Survey). In order to reflect the high cost of living in the San Francisco Bay Area, District Staff used 90% of the median income for the service area (\$88,034) to derive a low-income cut-off. Since data from the District's most recent passenger survey was collected in fixed groupings, and \$75,000 is the closest grouping to \$88,034, this analysis uses household incomes of \$75,000 or less as the definition of low-income.

For the disparate impact analysis, a “minority” rider is any rider who identifies themselves as any race or ethnicity other than white, non-Hispanic.

1. *Data: 2018 District System-wide Survey*

In 2018, the District participated in the Metropolitan Transportation Commission’s (MTC) region-wide passenger survey. The consultant selected by MTC and by District Staff surveyed all of the District's services, including GGT and Golden Gate Ferry (GGF). Data was collected on-board a sample of bus and ferry trips. Questionnaires were in Spanish and English and included questions about the trip being taken and demographics. Presented below are the results in 2018 to questions regarding income and race for riders of all bus routes and for Route 44 riders specifically.

Table 1: Household Income

Household Income	Route 44 (%)	Golden Gate Transit (%)
Below \$10,000	0	3
\$10,000 - \$24,999	0	5
\$25,000 - \$34,999	0	7
\$35,000 - \$49,999	14	13
\$50,000 - \$74,999	12	24
\$75,000 - \$99,999	9	13
\$100,000 - \$149,999	11	12
\$150,000 or more	39	8
REFUSED	14	15
Skip - Paper Survey	0	<1

Using the cut-off of **\$75,000** to define “low-income,” 52% of all bus riders reported being low-income, where 26% of Route 44 riders reported being low-income..

Table 2: Race/Ethnicity

Race/Ethnicity	Route 44 (%)	Golden Gate Transit (%)
White alone, non-Hispanic	65	58
Asian alone, non-Hispanic	19	8
African-American alone, non-Hispanic	9	10
Latino/Hispanic, any race	6	16
Mixed race, non-Hispanic	0	4
Native Hawaiian or Pacific Islander alone, non-Hispanic	0	<1
No race provided	0	<1
American Indian or Alaskan Native alone, non-Hispanic	0	<1
Other, non-Hispanic	0	<1

42% of all bus riders responding to the question reported identifying with a race and ethnicity other than “White Non-Hispanic,” where 35% of Route 44 riders responding to the question reported the same.

B. Equity Analysis Findings

The proposed elimination of Route 44 does not constitute a disproportionate burden on low-income riders or a disparate impact on minority riders.

No Disproportionate Burden

As shown in Table 3 below, whereas 52% of all GGT bus riders are low-income, 26% of Route 44 riders are low-income. Riders who did not report their income were excluded from this analysis for lack of data. Accordingly, the low-income ridership of the Route 44 passengers is proportionally less than the low-income ridership of the system as a whole by 26%. Therefore, we conclude that the cancellation of Route 44 would not have a disproportionate burden on low income riders, and would burden non-low-income riders relatively more than low-income riders.

Table 3. Low-Income and Non-Low Income Ridership

	Golden Gate Transit Ridership	Route 44 Ridership	Difference
Non-Low-Income	33%	59%	26%
Low-Income (less than \$75,000)	52%	26%	-26%

No Disparate Impact

As shown in Table 4 below, 42% of passengers on GGT bus service overall are minority. On Route 44, only 35% of passengers identify as minority. Thus, elimination of Route 44 will affect riders with a 7% lower proportion of minorities than riders on Golden Gate buses as a whole. Therefore, we concluded that the cancellation of Route 44 would not have a disparate impact on minority riders, and would burden non-minority riders relatively more than minority riders.

Table 4. Minority and Non-Minority Ridership

	Golden Gate Bus Ridership	Route 44 Ridership	Difference
Non-Minority	58%	65%	7%
Minority	42%	35%	-7%

C. Conclusion

The elimination of Route 44 will cause neither a disparate impact on minority riders nor a disproportionate burden on low-income riders under the District's Title VI Policies.

Attachment: Exhibit A-Resolution Adopting of Title VI Policies

EXHIBIT A

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2013-078

**APPROVE ADOPTION OF POLICIES FOR GOLDEN GATE TRANSIT
AND GOLDEN GATE FERRY SERVICE AND FARE CHANGES,
UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**

August 9, 2013

WHEREAS, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) operates Golden Gate Transit (GGT) bus service and Golden Gate Ferry (GGF) service, both of which are public transportation services that occasionally receive federal funding to maintain or improve service scope and quality; and,

WHEREAS, on November 15, 2012, staff presented the Transportation Committee (Committee) with an overview of Title VI as applied to federal funding recipients, such as the District, subject to the new Circular Order issued by the Federal Transit Administration (FTA); and,

WHEREAS, on February 22, 2013, the Board approved the first action required by the new FTA Circular by adopting the required service standards and policies; and,

WHEREAS, to further comply with the new FTA Circular, the District must establish the following three policies: a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy (Three Policies); and,

WHEREAS, the Three Policies will guide when and how the District analyzes the effects of potential future fare and service changes on minority and low-income populations and, in the event the District finds disparities, the District must evaluate whether there is an alternative that has a more equitable impact; and,

WHEREAS, the new FTA Circular requires transit providers, such as the District, to solicit and consider public input before establishing such policies; and,

WHEREAS, staff presented the Three Policies to the Committee on June 13, 2013, and the Committee recommended and the Board, by Resolution No. 2013-054 at its meeting of June 14, 2013, authorized the setting of a public hearing on a proposal to establish policies for Golden Gate Transit and Golden Gate Ferry Service and for fare changes under Title IV of the Civil Rights Act of 1964 as amended; and,

WHEREAS, the District conducted outreach relative to this proposal, as follows: (1) a press release was issued on July 17, 2013; (2) information was posted on the District's website, emailed to District's opt-in subscription lists and community-based organizations, posted on District's social media sites, and published as advertisements and legal notices in several periodicals including *San Francisco Chronicle*, *Marin Independent Journal* and the *Santa Rosa Press Democrat*; (3) Public Outreach Meetings were held on July 8, 2013 in Marin City, on July 9, 2013 in Novato, and on July 10, 2013 in Rohnert Park; and, (4) Spanish translations of printed materials, website information, and community meetings were available at all public outreach meetings and at the public hearing; and,

WHEREAS, public comments on the Three Policies could be submitted by either attending the public hearing or the public outreach meetings, emailing publichearing@goldengate.org or sending written comments to the District; and,

WHEREAS, due to concerns about Marin City residents not having received sufficient advance notice of the opportunity to comment on the Three Policies, the District extended the comment period by two weeks and held an additional public outreach meeting at the Marin City Library on July 25, 2013; and,

WHEREAS, seven public comments were received by the District as of July 25, 2013, and while several comments were related to the overall topic of Title VI, none of the comments were specific to the Three Policies; and,

WHEREAS, complete copies of the Three Policies and staff's underlying analysis, as well as a summary of the comments received and staff responses, are included herein as Attachments; and,

WHEREAS, the Transportation Committee at its meeting of August 2, 2013, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves adoption of policies for Golden Gate Transit and Golden Gate Ferry Service and fare changes, under Title VI of the Civil Rights Act of 1964, as amended, and attached hereto.

RESOLUTION NO. 2013-078

BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013

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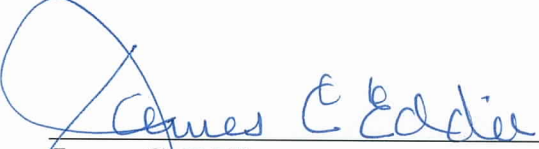
ADOPTED this 9th day of August 2013, by the following vote of the Board of Directors:

AYES (15): Directors Arnold, Belforte, Breed, Cochran, Fredericks, Moylan, Pahre, Rabbitt, Reilly, Sears, Snyder, Sobel and Theriault; Second Vice President


Stroeh; President Eddie

NOES (0): None

ABSENT (4): Directors Campos, Wiener and Yee; First Vice President Grosboll


James C. Eddie
President, Board of Directors

ATTEST:


Janet S. Tarantino
Secretary of the District

Attachment 1 - Three Policies and Analysis

Attachment 2 - Summary of Comments Received and Staff Responses

ATTACHMENT 1

Proposed Title VI Policies Pertaining to Major Service Changes, Disparate Impacts, and Disproportionate Burdens

Major Service Change Policy

The District must ensure that its services are provided equitably, without discrimination based on race, color, national origin or socio-economic status. To that end, the District must evaluate potential “major” service changes and all fare changes (except for those specifically exempt in the FTA Title VI Circular, such as Spare-the-Air Days and short-term promotional service demonstrations or fare decreases) for their impact on low-income and minority populations in its service area. Before this can occur, the District must adopt a Major Service Change policy to provide a concrete basis for determining which service changes need to be analyzed for equity.

Staff proposes the following for the District’s Major Service Change Policy:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Staff further proposes the following exemptions such that these changes would not be subject to a Title VI Equity Analysis:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (such as promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The following examples will assist the public in understanding the impact of the proposed policy.

- Example 1: If Route 11 has 20 trips a day, and the District proposes to cancel six of those trips (30%) in January 2014, then that is a major service change, and a Title VI Equity Analysis must be completed. However, if only four trips are proposed for cancellation (20%), then no analysis is required. If the District cancels these four trips and then decides to cancel two more trips in January 2015 on this same Route 11, then the percentage will again be 30% over a twenty-four month period, and an analysis will be required.
- Example 2: If Route 12 has eight trips per day and four trips are proposed for cancellation, then under the proposed policy, a Title VI Analysis is not required because the route has fewer than ten total trips per day. However, if the entire route is proposed for cancellation, then an analysis is required.
- Example 3: If Route 13 is introduced in January 1, 2014 as a demonstration service, and the District proposes to discontinue it effective December 31, 2015, then no analysis

is required when the service is introduced or discontinued. However, if the District proposes to continue the service beyond January 1, 2015, then an analysis is required for it to continue, and for it to be discontinued thereafter.

- Example 4: If Route 14 operated four times a day from Corte Madera to Petaluma, and the District planned to cease operating this trip while another transit system planned to operate the same route four times a day at the same times, with the same or better fares and transfer options, then no analysis would be required.

Disparate Impact and Disproportionate Burden Policies

When a fare change or major service change is proposed, the District must analyze whether the change will result in a fair distribution of both negative effects (such as service cuts or fare increases) and positive effects (service expansions or fare reductions, such as new discounts).

In the case of the Disparate Impact Policy, the analysis focuses on whether minority riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-minority riders or residents.

Similarly, in the case of the Disproportionate Burden Policy, the analysis focuses on whether low-income riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-low-income riders or residents.

Disparate Impact Policy

In conducting equity analyses, the Disparate Impact policy provides the threshold used to determine whether greater negative impacts – or lesser positive impacts – on **minority** riders and residents are significant.

If a proposed action would have a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or a benefit that would be available to non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. If no option with a less disparate effect exists, the District must take measures to mitigate the impact of the proposed action on the affected minority population **and** demonstrate that a legitimate business purpose cannot otherwise be accomplished.

Staff proposes the following for the District's Disparate Impact Policy:

1. The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The question that must be answered for every major service change and every fare change is: are minority riders more negatively affected (or less positively affected) by this change than riders as a whole? This is determined primarily by calculating the percentage of minority riders on

Golden Gate buses (or ferries, for a ferry service or fare change) and by calculating the percentage of minority riders affected by the change. If minorities represent a higher percentage in the impacted group than in the general ridership as a whole, the question is, how much higher? If the difference is ten percent or higher, then there is a disparate impact. As a secondary aspect of, and important precursor to, this comparative analysis, the District must define the adverse effects and/or benefits being measured for the change in question.

Some hypothetical examples of how the policy could be applied follow:

- Example 1: The District proposes to discontinue Route 16. Fifty percent of Route 16's riders belong to a minority group. If ridership on the District's bus service as a whole is 35% minority, the difference in the percentage of affected riders who are minorities and the percentage of all bus riders who are minorities is 15 percentage points. That indicates that there is a disparate impact on minority riders, and in this situation, the District would be required to evaluate whether there is an alternative with a less disparate impact on minority riders. If there is no other alternative, the District would need to mitigate the negative impact of the service cancellation on minority riders **and** demonstrate that the service reduction serves a legitimate business purpose that cannot be accomplished with less impact on minority riders.
- Example 2: The District proposes to raise fares from Zone 4 to Zone 1 by 10% and the rest of the fares only 5%. Whereas the overall ridership is 35% minority, if Zone 4 to Zone 1 riders is, for example, 46% minority, then the difference between the two groups is 11 percentage points, exceeding the 10% threshold, and there would be a disparate impact. The District would have to seek alternatives with a more equitable impact. If no such alternatives are available, then the District would have to mitigate the impact on minority riders **and** demonstrate that this fare increase serves a legitimate business purpose that cannot be accomplished in another less-discriminatory way.

Disproportionate Burden Policy

As with the Disparate Impact Policy, the Disproportionate Burden Policy comes into play when a fare change or major service change is analyzed for its equity. In this case, staff determines whether **low-income** riders and residents bear a disproportionate burden of the negative effects of – or enjoy a disproportionately low benefit from – the proposed change.

The proposed Disproportionate Burden Policy is very similar to the proposed Disparate Impact Policy and reads as follow:

2. The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

If, in the course of performing a Title VI Equity Analysis, the District finds that a proposed fare or major service change has a negative impact that affects low-income riders as compared to

non-low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income riders more than low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. Otherwise, the District must take measures to mitigate the impact of the proposed action on the affected low-income population.

Again, illustrative examples can make the uses of the policy more transparent:

- Example 1: The District proposes to discontinue Route 16. The ridership of Route 16 is 66% low-income. If ridership on the District's bus service as a whole is 50% low-income, then the difference between the low-income ridership of the Route 16 and the overall bus ridership is 16 percentage points, which means this change exceeds the threshold for disproportionate burden, or in other words, that low-income riders are bearing a disproportionate burden of this service change. In this situation, the District would be required to take measures to mitigate or lessen the impact of this change on the low-income riders of Route 16.
- Example 2: The District proposes to cut four trips on Route 21. The ridership of Route 21 is 45% low-income. If the ridership on the District's bus service as a whole is 50% low-income, then the difference is negative five percentage points (meaning the affected ridership is five percent less low-income than the overall ridership), and the burden of this change does not fall more on low-income riders than on riders as a whole.
- Example 3: The District proposes to add a new route. The residents of the areas served are 25% low-income. If the District's ridership as a whole is 50% low-income, those benefiting from the service addition are 25% less low-income than the overall ridership. There is a disproportionate benefit, and the District would be required to consider options for mitigating this disproportion.

ATTACHMENT 2

Summary of Comments Received and Staff Responses

1. **Comment:** Special fares for minorities?? Racism of the worst order.

Staff response: The public comment process is not about setting special fares for minorities but instead setting a framework for evaluating the impacts of future service or fare changes on disadvantaged communities.

2. **Comment:** I have been advocating for Title VI populations in Marin City. In order to get proper notification to minority and low-income populations adequate communication must be provided as an outreach mechanism to ensure against a community not being left out. Inasmuch as this did not happen in Marin City, where both low-income and minority residents were left out with no notification of an Open House on July 8 at the Senior Center, there is a violation of Title VI. I noticed an 8 1/2 by 11 inches poster (only one hour before the meeting) at the Marin City Hub. This was another disappointment to me and others in our community. Our shuttle service is inadequate for serving our community because of the hilly terrain.

Staff response: Given concern about the adequacy of the notification process for Marin City residents, the public comment period was extended by two weeks, additional communications were sent out, notices were posted at all bus stops in that community, and leaflets were handed out to bus riders advising that an additional public outreach meeting was scheduled in Marin City. The proposed policies are specific to regional bus and ferry services operated by the Golden Gate Bridge Highway and Transportation District. Shuttle and other fixed route and demand responsive service operated by Marin Transit and policies related to those services are the responsibility of Marin Transit.

3. **Comment:** I'm glad that you're having an additional comment period for Marin City, but in the future it's important that more advertising and outreach is implemented. Many residents were unaware about the meeting and the comment period.

Staff response: See response to Comment #2. Future outreach efforts in Marin City will include more extensive communication efforts.

4. **Comment:** It appears the proposals brought to the hearing are all about raising fares and arguing about whether or not the District can raise some and not others without discrimination. The point should be THERE SHOULD BE NO FARE INCREASES, BUT FARE DECREASES.

Staff response: The proposed policies provide a framework to evaluate future potential service and fare changes. No fare changes are proposed at this time.

5. **Comment:** The District's Allocation of resources between bus and ferry services needs to be re-evaluated in view of Title VI. There is a disproportionate amount of resources going to wealthy ferry riders and not to low-income bus riders.

Response: Duly noted. The proposed policies do not address specific to the District's allocation of transit resources between modes. The District plans to analyze the demographic characteristics of its ferry and regional bus riderships.

6. **Comment:** The job of the Golden Gate Transit District is to provide public transportation, in order to reduce automobile traffic and provide a reasonable-cost alternative to driving. The job of the District is transportation, NOT social justice, affirmative action or welfare. All this would do is raise the cost of transportation due to the additional resources needed to determine, implement and monitor these Title VI items. It is ridiculous to put the Transit District into this situation. The \$5,000 to conduct this initial public hearing will be pocket change to the cost of implementation. The bottom line is stick to your primary objective and tell the feds to make their own determinations that the Transit District is discriminatory, and make them prove it. Focus on serving the communities you service, while keeping costs down, and not on Washington D.C's social justice schemes.

Response: The proposed policies and overall compliance with Title VI is a condition of the District continuing to receive federal financial assistance for its public transportation programs.

7. **Comment:** I oppose any fare increases for the Golden Gate transit ferries, buses and bridge. The fares are exorbitant as they are now and are a huge burden on the average person's finances. This is supposed to be PUBLIC transportation, not ELITE transportation. It is only affordable to the rich.

Response: The proposed policies are not specific to any fare increase at this time. They will be used to evaluate future fare increase proposals.

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Appendix B Staff Responses to Public Comments

Summary

At the close of the public comment period on June 21, 2019, there were 197 unique comments received by the District. Of these 197 comments, 123 (62%) expressed opposition to the proposal (Proposal), 17 (9%) were in favor of the Proposal, and 57 (29%) did not support or oppose the Proposal.

Comments on the Proposal

Comments Made in Support of the Proposal

The District received 17 comments in support of the Proposal. Seven (7) comments were in favor of changes to Route 24; one (1) comment was in favor of eliminating the Sleepy Hollow portion of Route 27; one (1) comment was in favor of the change to Route 38; four (4) comments were in favor of the change to Route 54; and four (4) comments were in favor of the change to Route 56. This tally includes correspondence from the District's Bus Passengers Advisory Committee (BPAC) in support of Routes 24 and 24X serving bus stops on Sir Francis Drake Blvd. rather than the San Anselmo Hub.

Comments Neither Opposed nor in Favor

The District received 57 comments neither in support of nor in opposition to the Proposal. Of these, 47 comments expressed concerns about aspects of Golden Gate Transit service on the affected routes. The remaining 10 comments were unrelated to the proposal or requested additional information.

Comments Made in Opposition to the Proposal

The District received 123 comments in opposition to the Proposal.

Of the 47 comments of concern and 123 comments in opposition to the proposal, several specific themes were mentioned. The themes of these 170 unique comments are addressed below. General comments made on the Proposal are also addressed.

- ***Comment: Route 38 – Keep Service Along Del Ganado Road in Terra Linda (21)***
Twenty-one (21) comments were opposed to the cancellation of Route 38 service along Del Ganado Road in Terra Linda. Several comments suggested that some existing trips could be kept as a compromise. The revised proposal would maintain Route 38 service with three (3) trips in the morning and three (3) trips in the evening. There are currently five (5) trips in the morning and four (4) trips in the evening. There would be no reduction to the existing span of service; several comments indicated the need to use Route 38 at certain times of day so they can drop off their children at school.

- ***Comment: Route 44 – Keep Service in Lucas Valley (17)***
 Seventeen (17) comments were opposed to the cancellation of Route 44 service in Lucas Valley. A few comments suggested that one trip each direction could be maintained as a compromise, but commenters were not in agreement about a single time that would work. The revised proposal would extend two (2) trips in each direction on Route 38 from Marinwood to Lucas Valley. These trips would be designated Route 38A. Schedules for Route 38A would be designed to approximately meet work start and end times in San Francisco that are currently served by Route 44.
- ***Comment: Route 27 – Keep Service in Sleepy Hollow (17)***
 Seventeen (17) comments were opposed to the cancellation of Route 27 service in Sleepy Hollow. Many comments did not indicate that they actually ride the service, several comments were a form response, and the number of comments received exceeds the average daily ridership of this service. The District proposed cancellation of this service in 2016, but service was maintained at the public's request. However, there has been no material change in ridership levels, which average six (6) per day, since then. The revised proposal still calls for the cancellation of this service.
- ***Comment: Various Routes – Provide Adequate/Improved Capacity/Trip Times (17)***
 Seventeen (17) comments expressed concern about the available seating capacity and trip times of the proposed schedules on Routes 24, 38, 54, and 56. Several comments suggested that additional trips could be necessary. The revised proposal reflects these concerns through the provision of additional service on Routes 24 and 38 beyond what the Proposal included. Proposed service levels on Routes 54 and 56 are sufficient to meet ridership demand. The District reviews ridership on an ongoing basis and can adjust bus assignments and trip times as necessary to ensure that available seating capacity meets demand on all routes affected by the revised proposal.
- ***Comment: Route 54 – Keep Service at San Rafael/Marinwood Bus Pads (16)***
 Sixteen (16) comments were opposed to the cancellation of Route 54 service at the Marinwood, Lucas Valley, Terra Linda, and North San Pedro Road Bus Pads. The revised proposal would maintain service on three (3) morning, two (2) afternoon, and two (2) evening trips at these bus pads, resulting in no degradation to the existing span of service.
- ***Comment: Route 44 – Keep Route 44 (15)***
 Fifteen (15) comments were opposed to the cancellation of Route 44 in general but did not indicate areas of concern. The revised proposal would maintain service on all existing segments of Route 44: service in Lucas Valley would be provided by Route 38A; service in Marinwood would be provided by Routes 38 and 38A; and service at freeway bus pads would be provided by Route 58.
- ***Comment: Various Routes – Keep Service at Particular Stop/Time (14)***
 Fourteen (14) comments expressed concern about the availability of service at particular bus stops at particular times on Routes 24, 38, 54, and 56 to meet individuals' family schedules. In all cases, both the Proposal and the revised proposal would maintain service at the bus stops and times in question.

- ***Comment: Route 24 – More Service Is Needed West of College of Marin (13)***
 Thirteen (13) comments were opposed to the proposed service levels of Route 24X, which would be the primary Commute route serving Fairfax and San Anselmo. Many commenters suggested that increased service levels could come on Route 24 or 24X, as they preferred frequency of service to faster service if forced to choose. The revised proposal would substantially increase service levels compared to the Proposal, with an overall increase of one (1) trip compared to existing service levels. Most of this service would be provided by Route 24; only four (4) trips total would operate as Route 24X.
- ***Comment: Route 44 – Keep Service in Marinwood (8)***
 Eight (8) comments were opposed to the cancellation of Route 44 service in Marinwood. However, the Proposal would more than double service levels in Marinwood on Route 38. The revised proposal would still provide more than double the existing service levels of Route 44 through a combination of service on Routes 38 and 38A.
- ***Comment: Route 27 – Provide Local Service in Sleepy Hollow (7)***
 Seven (7) comments expressed concern about the cancellation of Route 27 service in Sleepy Hollow and suggested that local service be provided. The revised proposal still calls for the cancellation of this commute service. Marin Transit provides local service in Marin County and may be able to provide service to Sleepy Hollow that better meets the needs of the community than Golden Gate Transit Route 27. District staff have shared this feedback with Marin Transit staff for their consideration.
- ***Comment: Route 24 – Keep Service to Fisherman’s Wharf/Levi’s Plaza (5)***
 Five (5) comments were opposed to the loss of direct service from Fairfax and San Anselmo to the Fisherman’s Wharf and Levi’s Plaza areas as a result of the replacement of Route 24 with Route 24X during peak periods. The revised proposal would maintain Route 24 and increase its service levels rather than expanding Route 24X, so direct service between these origins and destinations would be increased rather than decreased.
- ***Comment: Various Routes – Keep Service for Others (4)***
 Four (4) comments expressed concern about changes to Routes 27, 44, and 54 and suggested that service be maintained to provide service for affected passengers despite not being affected themselves. The revised proposal would maintain service for most affected passengers.
- ***Comment: Route 24 – Do Not Implement Route 24A or Expand Route 24X (3)***
 Three (3) comments expressed general opposition to the creation of Route 24A or the expansion of Route 24X. The revised proposal would increase service on Route 24 rather than create Route 24A or expand Route 24X.
- ***Comment: Route 24 – General Opposition (3)***
 Three (3) comments expressed general opposition to the proposed changes to Routes 24, 24A, and 24X. Based on detailed feedback received by other commenters, the revised proposal would increase service on Route 24, not create Route 24A, and keep limited service on Route 24X.

- ***Comment: General Opposition to Proposal (3)***
 Three (3) comments expressed general opposition to the proposal but did not reference specific issues. Based on detailed feedback received by other commenters, the proposal was revised to meet the requests of commuters on the affected routes.
- ***Comment: Route 44 – Provide Local Service in Lucas Valley (2)***
 Two (2) comments expressed concern about the cancellation of Route 44 and suggested that local service be provided in Lucas Valley. The revised proposal would maintain service in Lucas Valley on Route 38A. Local service is the responsibility of Marin Transit, which currently provides local service in Lucas Valley on Route 139.
- ***Comment: Route 24 – Operate Route 24A to/from San Anselmo Hub (1)***
 One (1) comment opposed the proposal because Route 24A would start or end at College of Marin rather than San Anselmo Hub. The revised proposal would increase service on Route 24 rather than create Route 24A; Route 24 serves San Anselmo.
- ***Comment: Route 54 – Operate Route 54C to Novato Blvd. (1)***
 One (1) comment opposed the proposal because Route 54C would not continue to serve Novato Blvd. at Wilson Avenue. The revised proposal would provide service at this location on Route 56X only; passengers would have to transfer at the Golden Gate Bridge Toll Plaza to frequent service available on any San Francisco Civic Center-bound bus to complete their trips. Alternatively, direct service on Route 54C would continue to be available at Seventh Street, which is approximately 0.8 miles east of this location.
- ***Comment: Routes 54 and 56 – Keep San Marin Service Unchanged (1)***
 One (1) comment expressed opposition to the proposal because the person preferred the existing service levels on Routes 54 and 56 in San Marin over the revised Route 56X. The revised proposal would provide Route 56X service only in San Marin because Routes 54 and 56 currently provide a high level of duplication. By reducing duplication, the District can reinvest these resources in expanded service on Route 56X, which would provide San Marin commuters with faster service (compared to Route 54) that is more frequent and has a longer service span (compared to Route 56).
- ***Comment: Route 38 – Provide Additional Afternoon Service (1)***
 One (1) comment expressed concern about the new Route 38 schedule and suggested that an additional trip leaving San Francisco at 3:30 PM be implemented. The revised proposal includes this additional trip to better serve the schedules of commuters in Terra Linda and Marinwood.
- ***Comment: General Concern About Proposal (1)***
 One (1) comment expressed general concern about the proposal but did not reference specific issues. Based on detailed feedback received by other commenters, the proposal was revised to meet the requests of commuters on the affected routes.

24

MONDAY - FRIDAY

San Francisco

Southbound

Manor - Fairfax - San Anselmo - Ross - College of Marin - Greenbrae - San Francisco

PROPOSED

Notes	Route	Manor (Sir Francis Drake & Olema)	Fairfax (Sir Francis Drake & Claus)	San Anselmo (Sir Francis Drake & Bank)	Kentfield (Sir Francis Drake at College of Marin)	Greenbrae (Sir Francis Drake & Eliseo)	Larkspur Ferry Terminal	Lucky Drive Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco Civic Center (Golden Gate & Polk)	San Francisco (Folsom & 7th)	San Francisco (Perry & 4th)
A	24	4:29a	4:32a	4:38a	4:43a	4:48a	---	4:50a	YES	5:20a	---	---	5:27a
	24	---	---	5:06a	5:11a	5:17a	5:20a	5:22a	YES	5:50a	---	---	5:57a
	24	5:24a	5:27a	5:33a	5:38a	5:44a	---	5:46a	YES	6:20a	---	---	6:28a
	24	5:51a	5:55a	6:01a	6:06a	6:13a	---	6:15a	YES	6:50a	---	---	6:58a
	24	6:18a	6:22a	6:28a	6:33a	6:40a	---	6:42a	YES	7:20a	---	---	7:29a
A	24	6:36a	6:40a	6:46a	6:51a	6:58a	---	7:00a	YES	7:40a	---	---	7:49a
	24X	6:49a	6:53a	6:59a	7:04a	---	---	---	YES	7:50a	---	---	7:59a
	24	6:56a	7:00a	7:06a	7:11a	7:18a	---	7:20a	YES	8:00a	---	---	8:10a
	24	7:07a	7:12a	7:19a	7:25a	7:34a	---	7:36a	YES	8:20a	---	---	8:30a
	24C	7:13a	7:18a	7:25a	7:31a	7:40a	---	7:42a	YES	---	8:20a	8:28a	8:34a
A	24X	7:21a	7:26a	7:33a	7:39a	---	---	---	YES	8:30a	---	---	8:40a
	24	7:29a	7:34a	7:41a	7:47a	7:56a	---	7:58a	YES	8:40a	---	---	8:50a
	24	7:44a	7:49a	7:56a	8:02a	8:11a	---	8:13a	YES	8:55a	---	---	9:05a
	24	7:51a	7:56a	8:06a	8:12a	8:21a	---	8:23a	YES	9:15a	---	---	9:25a
	24	8:16a	8:21a	8:31a	8:37a	8:46a	---	8:48a	YES	9:35a	---	---	9:45a
	24	8:45a	8:50a	9:00a	9:06a	9:15a	---	9:18a	YES	10:00a	---	---	10:10a

A: This trip operates via Broadway Tunnel.

24

MONDAY - FRIDAY

Fairfax/Manor

Northbound

San Francisco - Greenbrae - College of Marin - Ross - San Anselmo - Fairfax - Manor

COMMUTE ROUTE

PROPOSED

Notes	Route	San Francisco (Perry & 3rd)	San Francisco Financial District (Pine & Battery)	San Francisco (7th & Market)	San Francisco Civic Center (McAllister & Polk)	Golden Gate Bridge Toll Plaza	Lucky Drive Bus Pad	Greenbrae (Sir Francis Drake & Eliseo)	Kentfield (Sir Francis Drake at College of Marin)	San Anselmo (Sir Francis Drake & Bank)	Fairfax (Sir Francis Drake & Claus)	Manor (Sir Francis Drake & Glen)
	24	2:30p	2:40p	---	---	YES	3:26p	3:29p	3:34p	3:40p	3:47p	3:51p
	24	2:59p	3:10p	---	---	YES	3:56p	3:59p	4:04p	4:11p	4:21p	4:25p
	24	3:30p	3:40p	---	---	YES	4:27p	4:30p	4:36p	4:44p	4:54p	4:58p
	24	3:57p	4:10p	---	---	YES	4:57p	5:00p	5:06p	5:15p	5:25p	5:29p
	24	4:17p	4:30p	---	---	YES	5:08p	5:11p	5:17p	5:26p	5:36p	5:40p
A	24X	4:27p	4:40p	---	---	YES	---	---	5:22p	5:31p	5:41p	5:45p
	24	4:37p	4:50p	---	---	YES	5:40p	5:43p	5:49p	5:58p	6:08p	6:12p
	24	4:57p	5:10p	---	---	YES	6:00p	6:03p	6:09p	6:15p	6:25p	6:29p
A	24X	5:07p	5:20p	---	---	YES	---	---	6:14p	6:20p	6:30p	6:34p
	24	5:17p	5:30p	---	---	YES	6:18p	6:21p	6:27p	6:33p	6:43p	6:47p
	24C	5:21p	---	5:33p	5:38p	YES	6:27p	6:30p	6:35p	6:40p	6:50p	6:54p
	24	5:27p	5:40p	---	---	YES	6:24p	6:27p	6:33p	6:38p	6:48p	6:52p
	24	5:58p	6:10p	---	---	YES	6:51p	6:53p	6:59p	7:04p	7:13p	7:17p
	24	6:29p	6:40p	---	---	YES	7:15p	7:17p	7:23p	7:28p	7:37p	7:41p
	24	7:00p	7:10p	---	---	YES	7:44p	7:46p	7:51p	7:55p	8:03p	8:07p

A: This trip operates via Broadway Tunnel.

27

MONDAY - FRIDAY

COMMUTE ROUTE

**San Francisco
Southbound****PROPOSED**

San Anselmo - San Rafael - San Francisco

Notes	San Anselmo Hub (Center & Sir Francis Drake)	San Rafael Transit Center (3rd & Hetherton)	Lucky Drive Bus Pad	Paradise Drive Bus Pad	Tiburon Wye Bus Pad	Seminary Drive Bus Pad	Spencer Avenue Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco Financial District (Davis & California)	San Francisco (Perry & 4th)
A	---	4:30a	4:33a	4:35a	4:37a	4:38a	4:42a	YES	5:05a	---	5:14a
	5:53a	6:06a	---	---	---	---	---	YES	6:41a	---	6:50a
	6:23a	6:36a	---	---	---	---	---	YES	7:15a	---	7:25a
	6:49a	7:03a	---	---	---	---	---	YES	7:45a	---	7:55a
	7:02a	7:15a	---	---	---	---	---	YES	8:00a	---	8:12a
	7:20a	7:33a	---	---	---	---	---	YES	8:15a	---	8:25a
	7:35a	7:48a	---	---	---	---	---	YES	8:30a	---	8:40a
	7:50a	8:03a	---	---	---	---	---	YES	8:45a	---	8:55a
	8:20a	8:33a	---	---	---	---	---	YES	9:20a	---	9:32a
	8:50a	9:03a	---	---	---	---	---	YES	9:50a	---	10:02a
	9:22a	9:35a	9:42a	9:44a	9:46a	9:47a	9:50a	YES	---	10:25a	10:39a
	10:22a	10:35a	10:42a	10:44a	10:46a	10:47a	10:50a	YES	---	11:25a	11:39a
	11:22a	11:35a	11:42a	11:44a	11:46a	11:47a	11:50a	YES	---	12:25p	12:39p
	12:22p	12:35p	12:42p	12:44p	12:46p	12:47p	12:50p	YES	---	1:25p	1:39p
	1:22p	1:35p	1:42p	1:44p	1:46p	1:47p	1:50p	YES	---	2:25p	2:39p
	2:22p	2:35p	2:42p	2:44p	2:46p	2:47p	2:50p	YES	---	3:25p	3:39p
	3:21p	3:35p	3:44p	3:46p	3:48p	3:49p	3:52p	YES	---	4:32p	4:46p
	4:20p	4:35p	4:44p	4:46p	4:48p	4:49p	4:52p	YES	---	5:32p	5:46p
	5:20p	5:35p	5:44p	5:46p	5:48p	5:49p	5:52p	YES	---	6:29p	6:40p

A: This trip operates via Broadway Tunnel.

27

MONDAY - FRIDAY

COMMUTE ROUTE

**San Anselmo
Northbound****PROPOSED**

San Francisco - San Rafael - San Anselmo

San Francisco (Perry & 3rd)	San Francisco Financial District (Fremont & Mission)	Golden Gate Bridge Toll Plaza	Spencer Avenue Bus Pad	Seminary Drive Bus Pad	Tiburon Wye Bus Pad	Paradise Drive Bus Pad	Lucky Drive Bus Pad	San Rafael Transit Center (3rd & Hetherton)	San Anselmo Hub (Center & Sir Francis Drake)
7:52a	8:00a	YES	8:33a	8:37a	8:38a	8:40a	8:42a	8:50a	9:03a
8:54a	9:02a	YES	9:34a	9:38a	9:39a	9:41a	9:43a	9:50a	10:03a
9:54a	10:02a	YES	10:34a	10:38a	10:40a	10:44a	10:48a	10:55a	11:10a
10:54a	11:02a	YES	11:34a	11:38a	11:40a	11:44a	11:48a	11:55a	12:10p
11:49a	11:57a	YES	12:34p	12:38p	12:40p	12:44p	12:48p	12:55p	1:10p
12:49p	12:57p	YES	1:34p	1:38p	1:40p	1:44p	1:48p	1:55p	2:10p
1:49p	1:57p	YES	2:34p	2:38p	2:40p	2:44p	2:48p	2:55p	3:10p
2:43p	2:51p	YES	3:28p	3:33p	3:35p	3:41p	3:46p	3:55p	4:10p
3:27p	3:37p	YES	---	---	---	---	---	4:37p	4:52p
3:57p	4:07p	YES	---	---	---	---	---	5:07p	5:22p
4:26p	4:37p	YES	---	---	---	---	---	5:38p	5:54p
4:53p	5:05p	YES	---	---	---	---	---	6:05p	6:21p
5:08p	5:20p	YES	---	---	---	---	---	6:13p	6:24p
5:37p	5:50p	YES	---	---	---	---	---	6:43p	6:53p
6:30p	6:41p	YES	---	---	---	---	---	7:30p	7:40p

38**MONDAY - FRIDAY****COMMUTE ROUTE****San Francisco
Southbound*****PROPOSED***

Lucas Valley - Marinwood - Terra Linda - Northgate - San Francisco

Route	Marinwood (Miller Creek & Marinwood)	Lucas Valley (Mt. McKinley & Idylberry)	Marinwood (Miller Creek & Cedarberry)	Terra Linda (De la Guerra & Del Ganado)	Terra Linda (Freitas & Montecillo)	Terra Linda (Las Gallinas at Northgate Mall)	San Rafael (Merrydale & N San Pedro)	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco (Perry & 4th)
38	6:04a	---	6:07a	6:19a	---	6:28a	6:34a	YES	7:15a	7:26a
38A	6:26a	6:34a	6:42a	---	6:51a	6:57a	7:03a	YES	7:45a	7:56a
38	6:55a	---	6:58a	7:10a	---	7:19a	7:25a	YES	8:15a	8:26a
38A	7:14a	7:22a	7:30a	---	7:39a	7:45a	7:51a	YES	8:45a	8:56a
38	7:51a	---	7:54a	8:06a	---	8:15a	8:21a	YES	9:15a	9:26a

38**MONDAY - FRIDAY****COMMUTE ROUTE****Terra Linda/Marinwood
Northbound*****PROPOSED***

San Francisco - Northgate - Terra Linda - Marinwood - Lucas Valley

Route	San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	Golden Gate Bridge Toll Plaza	San Rafael (N San Pedro & Merrydale)	Terra Linda (Las Gallinas at Northgate Mall)	Terra Linda (Freitas & Montecillo)	Terra Linda (De la Guerra & Del Ganado)	Marinwood (Miller Creek & Cedarberry)	Lucas Valley (Mt. McKinley & Idylberry)	Marinwood (Miller Creek & Marinwood)
38	3:30p	3:42p	YES	4:42p	4:46p	---	4:55p	5:06p	---	5:09p
38A	4:00p	4:12p	YES	5:12p	5:16p	5:22p	---	5:30p	5:38p	5:46p
38	4:30p	4:42p	YES	5:38p	5:42p	---	5:51p	6:02p	---	6:05p
38A	5:00p	5:12p	YES	6:05p	6:09p	6:15p	---	6:23p	6:31p	6:39p
38	5:30p	5:42p	YES	6:35p	6:39p	---	6:48p	6:59p	---	7:02p

54

MONDAY - FRIDAY

**San Francisco
Southbound**

Novato - Ignacio - San Francisco

PROPOSED

Route	Novato GGT (Golden Gate Pl)	Novato (7th & Grant)	Novato (S Novato & Sunset)	Ignacio (Enfrente & Salvatore)	Alameda del Prado Bus Pad	Marinwood Bus Pad	Lucas Valley Bus Pad	Terra Linda Bus Pad	N San Pedro Rd Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco Civic Center (Golden Gate & Polk)	San Francisco (Folsom & 7th)	San Francisco (Perry & 4th)
54	4:48a	4:53a	4:59a	5:04a	5:07a	5:09a	5:10a	5:12a	5:14a	YES	5:50a	---	---	5:59a
54	5:17a	5:22a	5:28a	5:33a	5:36a	5:38a	5:39a	5:41a	5:43a	YES	6:20a	---	---	6:29a
54	5:46a	5:51a	5:57a	6:02a	6:05a	6:07a	6:08a	6:10a	6:12a	YES	6:50a	---	---	6:59a
54	6:07a	6:13a	6:19a	6:27a	6:31a	---	---	---	---	YES	7:15a	---	---	7:24a
54	6:29a	6:35a	6:42a	6:50a	6:54a	---	---	---	---	YES	7:40a	---	---	7:49a
54C	6:33a	6:39a	6:46a	6:54a	6:58a	7:00a	7:01a	7:03a	7:05a	YES	---	7:50a	7:54a	7:59a
54	6:42a	6:48a	6:55a	7:03a	7:07a	---	---	---	---	YES	8:00a	---	---	8:10a
54	6:59a	7:05a	7:12a	7:20a	7:24a	---	---	---	---	YES	8:25a	---	---	8:35a
54	7:20a	7:26a	7:33a	7:41a	7:45a	---	---	---	---	YES	8:50a	---	---	9:02a
54	7:43a	7:49a	8:00a	8:10a	8:15a	---	---	---	---	YES	9:20a	---	---	9:32a
54	8:18a	8:24a	8:31a	8:41a	8:46a	---	---	---	---	YES	9:50a	---	---	10:02a

54

MONDAY - FRIDAY

**Novato
Northbound**

San Francisco - Ignacio - Novato

PROPOSED

Route	San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	San Francisco (7th & Market)	San Francisco Civic Center (McAllister & Polk)	Golden Gate Bridge Toll Plaza	N San Pedro Rd Bus Pad	Terra Linda Bus Pad	Lucas Valley Bus Pad	Marinwood Bus Pad	Alameda del Prado Bus Pad	Ignacio Bus Pad	Novato (S Novato & Sunset)	Novato (7th & Grant)	Novato GGT (Golden Gate Pl)
54	2:33p	2:40p	---	---	YES	3:37p	3:39p	3:40p	3:42p	3:44p	3:46p	3:51p	3:58p	4:04p
54	3:02p	3:10p	---	---	YES	4:10p	4:12p	4:13p	4:15p	4:17p	4:20p	4:25p	4:32p	4:38p
54	3:31p	3:40p	---	---	YES	---	---	---	---	4:43p	4:46p	4:51p	4:59p	5:05p
54	3:59p	4:10p	---	---	YES	---	---	---	---	5:14p	5:17p	5:22p	5:30p	5:36p
54	4:23p	4:35p	---	---	YES	---	---	---	---	5:39p	5:42p	5:47p	5:54p	6:00p
54	4:43p	4:55p	---	---	YES	---	---	---	---	5:57p	6:00p	6:05p	6:12p	6:18p
54C	5:00p	---	5:09p	5:13p	YES	6:04p	6:06p	6:07p	6:09p	6:11p	6:14p	6:19p	6:26p	6:32p
54	5:03p	5:15p	---	---	YES	---	---	---	---	6:19p	6:22p	6:27p	6:34p	6:40p
54	5:28p	5:40p	---	---	YES	---	---	---	---	6:43p	6:46p	6:51p	6:58p	7:04p
54	6:01p	6:10p	---	---	YES	---	---	---	---	7:01p	7:03p	7:08p	7:15p	7:20p
54	6:31p	6:40p	---	---	YES	7:28p	7:30p	7:31p	7:33p	7:35p	7:37p	7:42p	7:49p	7:54p
54	7:01p	7:10p	---	---	YES	7:58p	8:00p	8:01p	8:03p	8:05p	8:07p	8:12p	8:19p	8:24p

56X**MONDAY - FRIDAY****COMMUTE ROUTE****San Francisco
Southbound*****PROPOSED***

San Marin - Novato - San Francisco

Novato GGT (Golden Gate Pl)	Novato (7th & Grant)	Novato (Novato & Wilson)	San Marin (San Marin & San Andreas)	San Marin (San Carlos & San Marin)	Atherton Ave Bus Pad	Rowland Blvd Park & Ride	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco (Perry & 4th)
4:34a	4:39a	4:42a	4:46a	4:50a	4:55a	5:01a	YES	5:50a	5:59a
5:03a	5:08a	5:11a	5:15a	5:19a	5:24a	5:30a	YES	6:20a	6:29a
5:32a	5:37a	5:40a	5:44a	5:48a	5:53a	5:59a	YES	6:50a	6:59a
5:55a	6:00a	6:03a	6:08a	6:13a	6:18a	6:24a	YES	7:15a	7:24a
6:14a	6:20a	6:23a	6:28a	6:33a	6:38a	6:44a	YES	7:40a	7:49a
6:34a	6:40a	6:43a	6:48a	6:53a	6:58a	7:04a	YES	8:00a	8:10a
6:46a	6:52a	6:55a	7:00a	7:05a	7:10a	7:16a	YES	8:25a	8:35a
7:05a	7:11a	7:14a	7:19a	7:25a	7:30a	7:36a	YES	8:50a	9:02a
7:40a	7:46a	7:49a	7:53a	7:59a	8:04a	8:10a	YES	9:20a	9:32a
8:15a	8:21a	8:24a	8:28a	8:34a	8:39a	8:45a	YES	9:50a	10:02a

56X**MONDAY - FRIDAY****COMMUTE ROUTE****San Marin
Northbound*****PROPOSED***

San Francisco - Novato - San Marin

San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	Golden Gate Bridge Toll Plaza	Rowland Blvd Park & Ride	Atherton Ave Bus Pad	San Marin (San Carlos & San Marin)	San Marin (San Marin & San Andreas)	Novato (Novato & Raposa Vista)	Novato (7th & Grant)	Novato GGT (Golden Gate Pl)
2:59p	3:07p	YES	4:08p	4:11p	4:16p	4:20p	4:24p	4:29p	4:35p
3:28p	3:37p	YES	4:38p	4:41p	4:46p	4:50p	4:54p	4:59p	5:05p
3:56p	4:07p	YES	5:08p	5:11p	5:16p	5:20p	5:24p	5:29p	5:35p
4:20p	4:32p	YES	5:33p	5:36p	5:41p	5:45p	5:49p	5:54p	6:00p
4:40p	4:52p	YES	5:53p	5:56p	6:01p	6:05p	6:09p	6:14p	6:20p
5:00p	5:12p	YES	6:16p	6:19p	6:24p	6:28p	6:32p	6:37p	6:43p
5:25p	5:37p	YES	6:36p	6:39p	6:44p	6:48p	6:52p	6:57p	7:03p
5:58p	6:07p	YES	7:03p	7:06p	7:11p	7:14p	7:18p	7:23p	7:28p
6:28p	6:37p	YES	7:33p	7:36p	7:41p	7:44p	7:48p	7:53p	7:58p
6:58p	7:07p	YES	8:03p	8:06p	8:11p	8:14p	8:18p	8:23p	8:28p

58

MONDAY - FRIDAY

San Francisco

Southbound

Novato - Ignacio - Hamilton - San Francisco

PROPOSED

Novato GGT (Golden Gate Pl)	Novato (Redwood & Grant)	DeLong Ave Bus Pad	Ignacio (Enfrente & Salvatore)	Hamilton Theater Parking Lot	Hamilton (Alameda del Prado & Nave)	Marinwood Bus Pad	Lucas Valley Bus Pad	Terra Linda Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco (Perry & 4th)
6:05a	6:09a	6:11a	6:19a	6:25a	6:30a	6:33a	6:35a	6:37a	YES	7:20a	7:29a
6:28a	6:32a	6:35a	6:43a	6:48a	6:53a	6:56a	6:58a	7:01a	YES	7:50a	7:59a
6:44a	6:48a	6:51a	7:01a	7:08a	7:16a	7:20a	7:23a	7:26a	YES	8:20a	8:31a
7:07a	7:11a	7:14a	7:29a	7:33a	7:40a	7:43a	7:46a	7:49a	YES	8:50a	9:01a

58

MONDAY - FRIDAY

Hamilton/Novato

Northbound

San Francisco - Hamilton - Ignacio - Novato

COMMUTE ROUTE

PROPOSED

San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	Golden Gate Bridge Toll Plaza	Terra Linda Bus Pad	Lucas Valley Bus Pad	Marinwood Bus Pad	Hamilton (Nave & Bolling)	Hamilton Theater Parking Lot	Ignacio Bus Pad	DeLong Ave Bus Pad	Novato (Redwood & Grant)	Novato GGT (Golden Gate Pl)
3:57p	4:09p	YES	5:11p	5:12p	5:13p	5:15p	5:18p	5:23p	5:25p	5:27p	5:30p
4:27p	4:39p	YES	5:41p	5:42p	5:43p	5:45p	5:48p	5:53p	5:55p	5:57p	6:00p
4:57p	5:09p	YES	6:11p	6:12p	6:13p	6:15p	6:18p	6:23p	6:25p	6:27p	6:30p
5:27p	5:39p	YES	6:38p	6:39p	6:40p	6:42p	6:45p	6:49p	6:51p	6:53p	6:56p

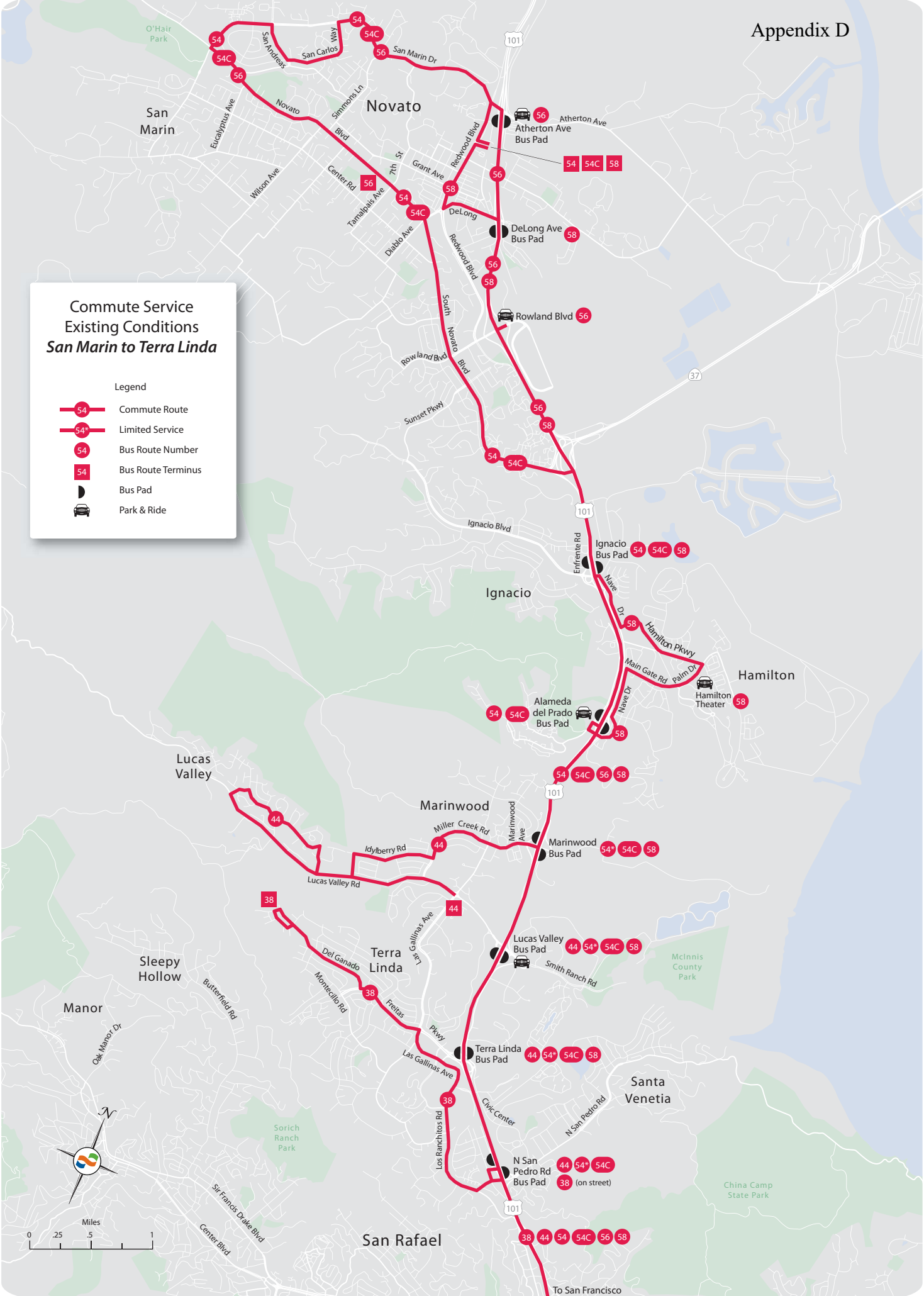
Appendix D



**Commuter Service
Existing Conditions
San Marin to Terra Linda**








Legend

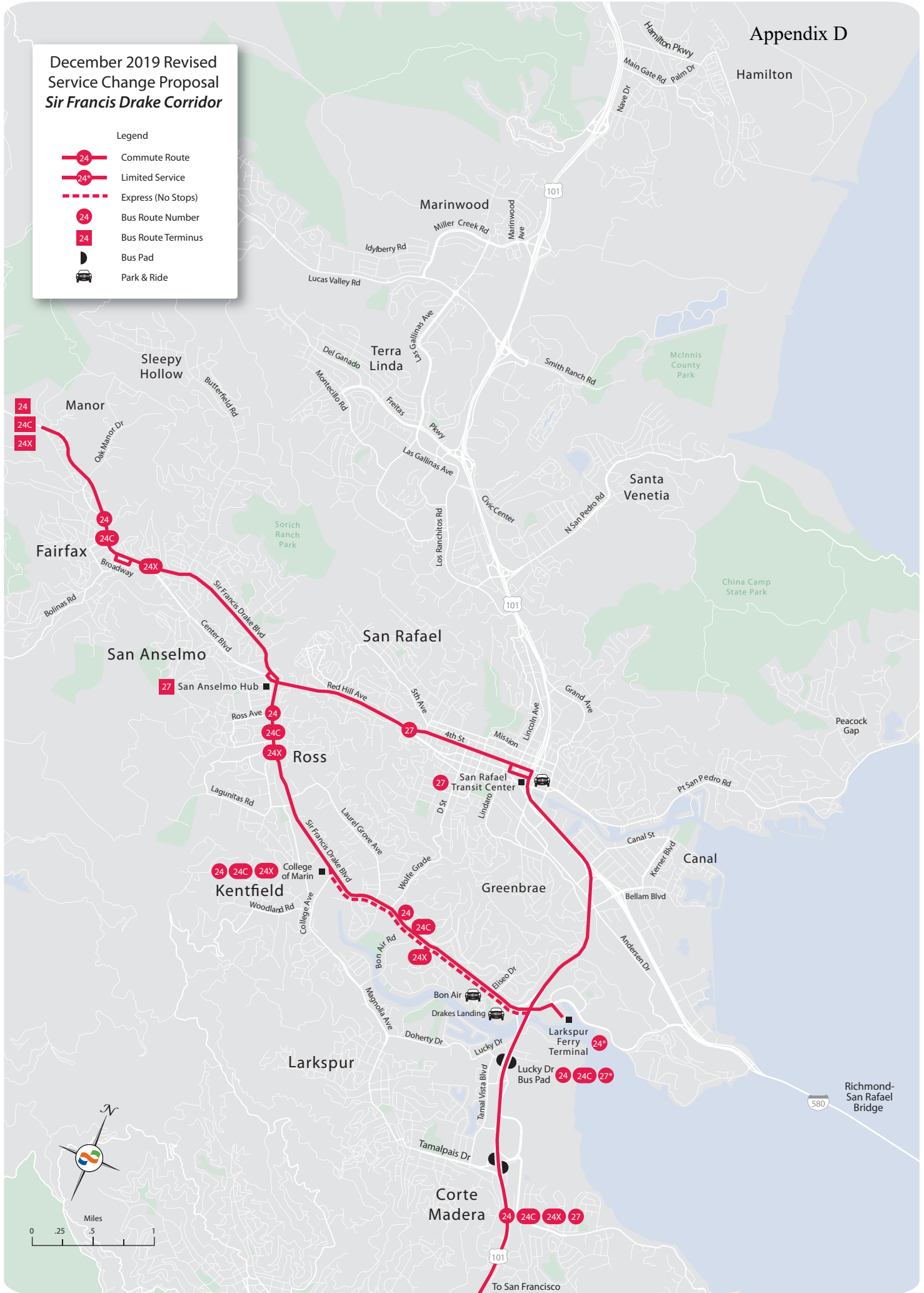
- Commute Route
- Limited Service
- Bus Route Number
- Bus Route Terminus
- Bus Pad
- Park & Ride



December 2019 Revised Service Change Proposal *Sir Francis Drake Corridor*

Legend

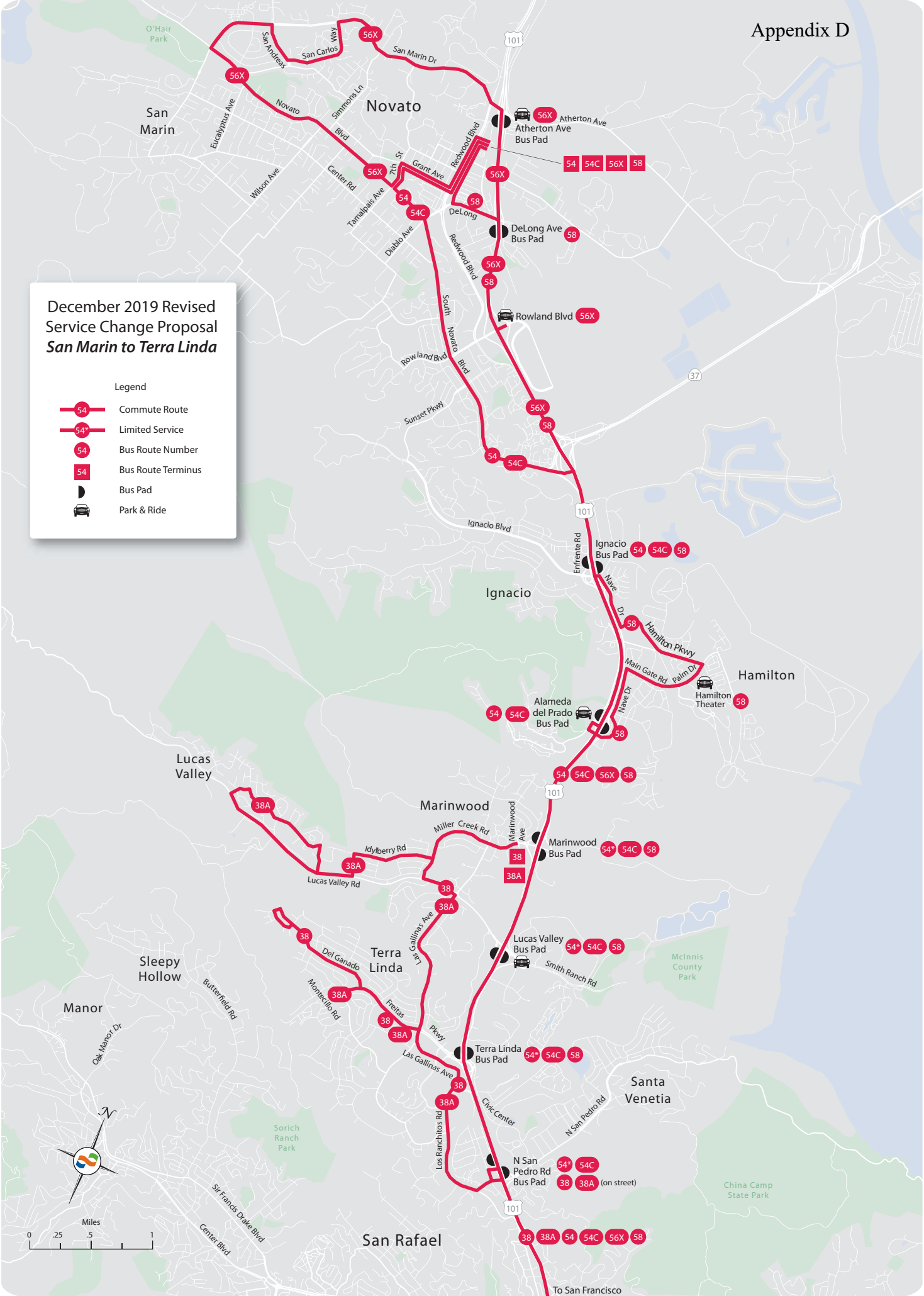
-  Commute Route
-  Limited Service
-  Express (No Stops)
-  Bus Route Number
-  Bus Route Terminus
-  Bus Pad
-  Park & Ride



**December 2019 Revised
Service Change Proposal
San Marin to Terra Linda**

Legend

- Commute Route
- Limited Service
- Bus Route Number
- Bus Route Terminus
- Bus Pad
- Park & Ride





Agenda Item No. (5)

To: Transportation Committee/Committee of the Whole
Meeting of July 25, 2019

From: Ron Downing, Director of Planning
James P. Swindler, Deputy General Manager, Ferry Division
Denis J. Mulligan, General Manager

Subject: **APPROVE ACTIONS RELATIVE TO ESTABLISHING GOLDEN GATE FERRY SPECIAL EVENT FARES AND SERVICE BETWEEN LARKSPUR AND THE CHASE CENTER IN SAN FRANCISCO, APPROVAL OF THE TITLE VI EQUITY ANALYSIS AND AUTHORIZE FILING A NOTICE OF EXEMPTION UNDER CEQA**

Recommendation

The Transportation Committee recommends that the Board of Directors approve actions relative to establishing special event ferry service between Larkspur and the Chase Center in San Francisco and amend the Master Ordinance accordingly, as follows:

1. Establish passenger ferry service between Larkspur and the Chase Center in San Francisco for Golden State Warriors games and other special events;
2. Establish passenger fares for special event ferry trips between Larkspur and the Chase Center in San Francisco as detailed in this report;
3. Approve the attached Title VI equity analysis; and,
4. File a Notice of Exemption under the California Environmental Quality Act (CEQA).

This matter will be presented to the Board of Directors for approval at the July 26, 2019, meeting for appropriate action. If approved by the Board, special event ferry service would commence no earlier than September 2019.

Background

On May 17, 2019, the Board of Directors (Board) approved the setting of a public hearing on June 20, 2019 to receive public comment on a proposal to implement special event ferry service to the Chase Center in San Francisco.

Discussion

The Board's policy identifies that establishing a new bus or ferry route constitutes a "Major Service Change" and thus requires a public engagement process that includes a formal public hearing. Similarly, Board policy also requires a public hearing to establish a new fare. The public hearing on June 20 would encompass both actions.

This service initially would operate for evening Warriors games and potentially serve a number of special events, such as concerts. This service would be analogous to the existing special event service to Oracle Park (formerly known as AT&T Park) for San Francisco Giants baseball games and other events.

Establishment of a Larkspur-Chase Center-San Francisco Fare

It is recommended that initially fares for Larkspur-Chase Center special event ferry service be set at the same rate as presently charged for Oracle Park (Giants) special event ferry service. Per Board Policy, the current Oracle Park service must recover all of its operating cost through fares, and those fares are set higher than normal fares due to the discretionary nature of this service. The current fare for Oracle Park service is \$14.00 per person and because this service is not considered regular service, no discounts are available through Clipper, nor for seniors, persons with disabilities, or youth. It is recommended that the Board apply the same policy to the Chase Center service so as to cover the cost of the service. Additionally, it is recommended that fare to the Chase Center be set at \$14.00, and that the fare be evaluated and changed, if necessary, mid-2020 to ensure that costs are being fully recovered.

CEQA Findings

It is recommended that the Board authorize staff to file a Notice of Exemption under the California Environmental Quality Act (CEQA) because the proposed special event service to the Chase Center is categorically exempt under CEQA Guidelines §15301 (Existing Facilities) and §15378 (No possibility of impact). Service will be limited to Golden State Warriors game days and to days when other special events such as concerts are offered. It is anticipated that most patrons will use transit due to the very limited availability of parking at the Chase Center and that the proposed ferry service will mitigate traffic impacts in the immediate area of the Chase Center. Therefore, there will be no adverse impact from the Golden Gate Bridge, Highway and Transportation District (District) providing this service and reliance on a Categorical Exemption is appropriate. If approved by the Board, staff will file the Notice of Exemption with the City and County of San Francisco and the County of Marin.

Title VI Equity Analysis

In accordance with Federal Transit Administration regulations and guidance implementing Title VI of the Civil Rights Act of 1964, as well as the District's Title VI Policies, staff conducted an equity analysis to determine whether new special event service to the Chase Center would result in a disparate impact to minority populations or impose a disproportionate burden on low-income populations in the District's service area. The analysis examined demographic data from the

District's Oracle Park ferry service, which is considered to serve the same purpose and the same potential ridership as the Chase Center ferry.

Overall, the analysis concludes that the proposed establishment of special event ferry service to the Chase Center will not disparately impact minority populations, but would result in a small disproportionate benefit for low income populations, based on the standards in the District's Title VI Policies, given the expected demographics of Chase Center passengers.

The complete Title VI equity analysis of the establishment of special event ferry service to the Chase Center is set forth in Appendix A.

Staff recommends that the Board adopt the attached equity analysis.

Public Notification and Comment

The public was notified of a public hearing through newspaper advertisements, posters on board buses and at ferry terminals, social media postings on Facebook and Twitter, and by e-mail blast to customers and community-based organizations. All printed materials were available in Spanish, per the District's Limited English Proficiency (LEP) Plan.

Public comments on this proposal to establish special event ferry service to the Chase Center in San Francisco, and establish a ferry fare for that service, were invited to be submitted in several different ways:

1. Attend the open house and/or the public hearing; or
2. E-mail publichearing@goldengate.org ;and/or,
3. Send written comments to District Secretary.

All comments were considered without regard to the manner in which the comments were submitted. Therefore, individuals did not have to attend the public hearing and provide testimony in person if they had commented through e-mail or written forms. All comments received through the above methods were considered in the final recommendation. Comments were received until close of business on Thursday, June 20, 2019.

The public hearing was held on June 20, 2019, at 9:30 a.m. in the Board Room, Administration Building at the Golden Gate Bridge Toll Plaza, San Francisco, CA. At the close of the public hearing, there were eight unique comments received on the proposal. Seven comments expressed support for the proposal to establish special event ferry service to the Chase Center, and one comment asked a question regarding where the ferry would dock. No comments were received in opposition to the proposal.

Fiscal Impact

In the absence of any operating data, because the Chase Center special event ferry would be new service, staff has determined that the new service will be analogous to the service currently operated to Oracle Park for Giants games and other special events. During FY 18/19, Oracle Park

special event service had nearly \$464,000 in operating expenses and covered those expenses entirely through fare revenues at a fare of \$14 per person, meeting the Board Policy of recovering expenses fully through fares. It is assumed that Chase Center service will have similar operating and financial characteristics and will also meet its expenses fully through fares charged. Nonetheless, if that should prove not to be true, staff proposes to reassess the fares charged for Chase Center special event service during 2020 to ensure compliance with Board policy.

Attachments: Appendix A: Title VI Equity Analysis

APPENDIX A

Title VI Equity Analysis: Implementation of Chase Center Ferry Service

**Presented to the Golden Gate Bridge, Highway and Transportation District
Transportation Committee
July 25, 2019**

I. Background

The Golden State Warriors basketball team (Warriors) has built a new arena in San Francisco's Mission Bay neighborhood, the Chase Center. To support the goal of reducing traffic congestion in the busy South of Market area, Staff proposes to begin offering ferry service to Warriors' home games starting with the 2019-20 season. The basketball season runs from mid-October to late April, and Staff proposes to operate one trip in each direction – to and from – each home game. The service will operate between the Larkspur Ferry Terminal and Mission Bay, for a distance of approximately 13 nautical miles each way.

Pursuant to FTA Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients") implementing Title VI of the Civil Rights Act of 1964 and the District's Title VI Policies, the Board must consider the impacts of the addition of this new ferry service on minority populations and low-income populations in the District's service area prior to deciding whether to implement the new route. As this is a new service, the relevant analysis is whether the benefits of the service accrue disproportionately to non-minority riders or non-low income riders.

The implementation of the new Chase Center special events service will not disproportionately benefit non-minority or non-low-income populations. Instead, the projected ridership for the service consists of more low-income and minority riders than Golden Gate Ferry service as a whole.

II. Title VI Policies

The District adopted its Major Service Change, Disparate Impact and Disproportionate Burden Policies (together referred to as "Title VI Policies") on August 9, 2013. These policies set forth the standards used in service equity analyses. The District's Major Service Change Policy reads in relevant part:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

The following are exemptions to the policy:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered "major" unless service on that route is eliminated completely on any such day.

- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The District’s Disparate Impact Policy provides:

- The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The District’s Disproportionate Burden Policy provides:

- The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

Public Outreach

Prior to Board adoption of the District’s Title VI Policies, public outreach regarding the policy proposals included:

- Informational meetings on July 8, 9 and July 10, 2013, in Marin County, Novato and Rohnert Park, respectively, between 4:30 p.m. and 6:30 p.m.
- Legal notices published in the *Marin Independent Journal*, the *San Francisco Examiner* and the *Santa Rosa Press Democrat* on June 18 and 25, 2013
- Signage posted onboard the ferryboats, at the Ferry Terminals, at transit hubs in Marin and Sonoma counties, at major bus stops and at the Customer Service Center at the San Rafael Transit Center
- Display boards, staff report and comment forms, including Spanish translations
- A press release issued and posted to the District’s web site on June 17, 2013, including links to the staff report in both English and Spanish
- A public hearing agenda and an associated staff report posted to the District’s web site on July 8, 2013
- Information e-blasted to the Bus and Ferry Subscriber’s list on June 20 and July 2, 2013
- Information posted to transit-specific social media channels on July 2 and July 8, 2013
- A public hearing agenda mailed to organizations and individuals on the District’s mailing list on July 8, 2013, and posted on District bulletin boards.

Comments Received

Of the comments received by the District, one alerted the District to the need to apply Title VI principles to the allocation of resources between bus and ferry services; one commented on the inconvenience of the time and location of the public hearing, service reliability, and driver attitudes; and another urged the District to reach out to community partners and agencies to get the word out about Title VI-related public hearings.

The resolution evidencing the Board's discussion and approval of the policies is attached as Exhibit A.

III. Golden Gate Ferry Services

The proposal concerns the Golden Gate Ferry ("GGF") Service, which is summarized below.

Golden Gate Ferry Services

The District's Golden Gate Ferry service includes four routes between Marin County and San Francisco: Sausalito, Larkspur, Tiburon, and Special Event service to Oracle Park. Ferry service operates daily except Thanksgiving, Christmas, and New Year's Day.

- *Sausalito Ferry Service* provides daily connections between the Golden Gate Ferry landing in Sausalito and the San Francisco Ferry Terminal. This 5.5 nautical-mile route has been in operation since 1970 and currently provides 18 crossings on weekdays and 12 crossings on weekends and holidays. The service operates between 7:10 am and 8:20 pm on weekdays, and between 10:40 am and 7:15 pm on weekends and holidays.
- *Larkspur Ferry Service* features an 11.25 nautical-mile route between the Larkspur Ferry Terminal and the San Francisco Ferry Terminal. The 40 weekday and eight weekend/holiday crossings require a fleet of five vessels. Services operate between 5:45 am and 10:05 pm on weekdays, and between 9:40 am and 8:10 pm on weekends and holidays.
- *Tiburon Ferry Service* operates on a 5.94 nautical-mile route Monday through Friday during the commute period between the Tiburon Ferry landing and the San Francisco Ferry Terminal. The service makes fourteen crossings a day, including four each in the morning and evening commute period and direction. Golden Gate Ferry assumed this commute ferry service from Blue & Gold Fleet in March 2017.
- *Special Event Service to Oracle Park* is offered during all San Francisco Giants' home games and a number of other special events. The 13.1 nautical-mile route between the Larkspur Ferry Terminal and the dock at Oracle Park requires approximately 60 minutes. One round trip is offered for each event served, which typically totals between 80 and 90 trips per year.

IV. The Chase Center Ferry Service Change Proposal, Purpose and Public Outreach

The construction of the new Chase Center in the Mission Bay neighborhood is anticipated to increase automobile traffic in San Francisco's already congested South of Market neighborhood immediately before and after Warriors home games. A significant portion of the attendees is projected to come from Marin and Sonoma Counties. The District proposes to alleviate the anticipated congestion by providing ferry service from Larkspur Terminal to Chase Center as an alternative means of transportation to and from Warriors games.

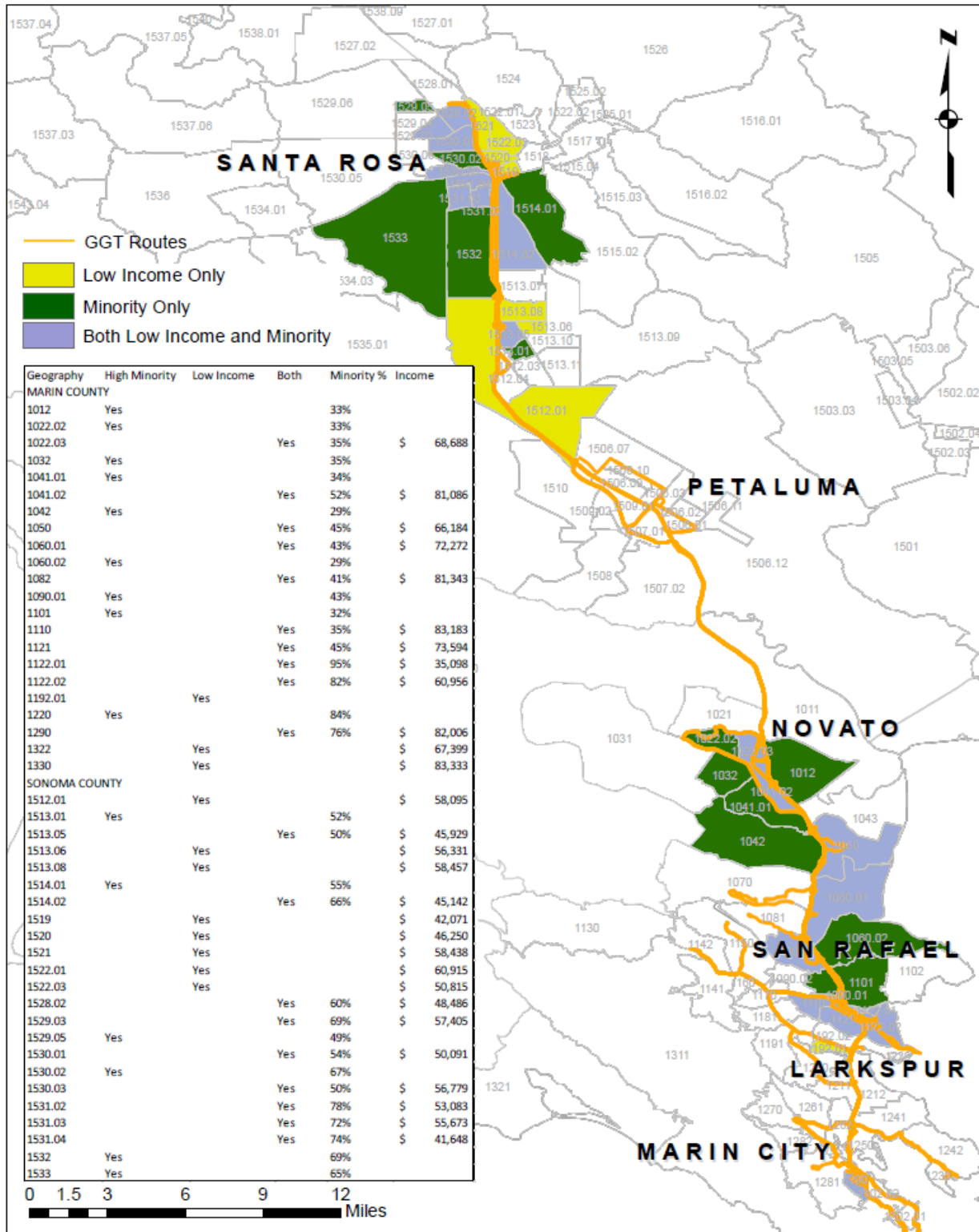
Golden Gate Ferry has been providing similar service to Giants' baseball home games since the Giants started playing in Oracle Park (formerly AT&T Park) in the year 2000. The goal is to provide Marin and Sonoma County residents a convenient ride to Giants' games and to help relieve automobile traffic on streets in San Francisco's South of Market neighborhood. The Oracle Park service operates on a "break-even" basis, which means that it is funded entirely by fares, unlike daily ferry service, which is subsidized by Golden Gate Bridge tolls and through state operating funds.

The proposed Chase Center service will also operate on a "break-even" basis, with fares covering the costs of operations.

Map 1

GGT SERVICE AREA

GGT service area includes all of Marin & Sonoma counties. Source: ACS Census 2013-2017. Tables S1903 & BO3002.



Public Comment Process

The District solicited and accepted public input on the proposed new service in several ways:

1. In person at a meeting or at a public hearing held on June 20, 2019;
2. By e-mail to publichearing@goldengate.org; and/or
3. In writing addressed to the District Secretary.

Public notification activities in advance of the hearing included:

- Advertisements were placed in local publications (Marin Independent Journal, Santa Rosa Press Democrat, and San Francisco Chronicle).
- Posters were displayed at ferry terminals advertising the public meetings.
- Press release was sent to local media and an article was written and ran in the Marin Independent Journal.
- Social media postings on Facebook and Twitter.
- Email blast to customers and community-based organizations.

Printed materials and handouts were translated into Spanish per the District's Limited English Proficiency (LEP) plan.

The District's practice is to treat all comments equally without regard to the manner in which the comments are submitted or received. Therefore, individuals need not attend the public hearing and provide testimony in person if they have commented through e-mail or written forms. In sum, the District received 8 comments on the proposed new service, 7 comments in support and one question.

V. Title VI Equity Analysis for the Implementation of Chase Center Ferry Service

The implementation of a new route is considered a Major Service Change based on the District's Major Service Change Policy, requiring a Title VI Equity Analysis to determine whether it will disproportionately benefit non-minority populations or non-low income populations, based on the District's Title VI Policies.

A. Equity Analysis Methodology

The FTA Circular states that for implementation of new route the appropriate comparison population is typically the population of the census blocks served by the new service as compared to the population of the District's service area as a whole. However, the proposed Chase Center service is a specialized route, with the anticipated ridership consisting primarily of attendees of Warriors basketball games. Accordingly, the population of the census block served is unlikely to be representative of ridership. A more appropriate projection for the ridership of the proposed route is the ridership of the District's special event service to San Francisco Giants baseball games at Oracle Park. The routes are similar in that both provide service between the Larkspur Ferry Terminal and professional sports stadiums less than a mile apart. This analysis compares the projected ridership of the proposed route against the ridership of the system as a whole.

For the purpose of the disproportionate burden analysis, Staff determined riders with a household income of less than \$75,000 per year to be low income. While the FTA Circular defines low-income persons based on the federal poverty guidelines, federal poverty standards are not a good fit for an area where the cost of living is so much higher than most localities. To compare, in 2015, the California State Income Limits that are used to determine eligibility for low-cost housing and

other programs gave a range of \$65,700 for a single-person household to \$123,000 for an 8-person household for the “low income” designation for Marin County (there are also “very low income” and “extremely low income” categories). Marin County, where the majority of ferry riders reside, has a comparatively high median income (\$97,815, from the 2012-2016 American Community Survey). In order to reflect the high cost of living in the San Francisco Bay Area, District Staff used 90% of the median income for the service area (\$88,034) to develop a low-income cut-off. As data was collected in fixed groupings during the most recent ridership survey, and \$75,000 is the closest grouping to \$88,034, this analysis uses household incomes of \$75,000 or less as the definition of low-income.

For the disparate impact analysis, a “minority” rider is any rider who identifies themselves as any race or ethnicity other than white, non-Hispanic.

1. *Data: 2018 District System-wide Survey*

In 2018, the District participated in the Metropolitan Transportation Commission’s (MTC) region-wide passenger survey. The consultant selected by MTC and by District Staff surveyed all of the District's services, including Golden Gate Transit (GGT) and GGF. Data was collected on board a sample of GGT bus and GGF ferry trips. Questionnaires were in Spanish and English and included questions about the trip being taken and demographics. Presented below are the responses in 2018 to questions regarding income and race for riders of all GGF ferry routes and also for the Oracle Park (then known as AT&T Park) GGF service, specifically.

Table 1: Household Income

Household Income	Oracle Park Ferry (%)	Golden Gate Ferry (%)
Below \$10,000	<1	<1
\$10,000 - \$24,999	3	<1
\$25,000 - \$34,999	11	2
\$35,000 - \$49,999	20	9
\$50,000 - \$74,999	23	35
\$75,000 - \$99,999	16	16
\$100,000 - \$149,999	9	12
\$150,000 or more	10	12
REFUSED	7	13
Skip - Paper Survey	<1	<1

Table 2: Race/Ethnicity

Race/Ethnicity	Oracle Park Ferry (%)	Golden Gate Ferry (%)
White alone, non-Hispanic	61	70
Latino/Hispanic, any race	18	6
African-American alone, non-Hispanic	10	6
Mixed race, non-Hispanic	6	11
Asian alone, non-Hispanic	5	7
American Indian or Alaskan Native alone, non-Hispanic	<1	<1
Native Hawaiian or Pacific Islander alone, non-Hispanic	0	<1
Other, non-Hispanic	0	<1
No race provided	0	<1

B. Equity Analysis Findings

Not including riders who did not respond to the question, 46% of all ferry riders have a household income of less than \$75,000 per year, compared to 57% of Oracle Ferry riders. Accordingly, the relative low-income ridership of the Oracle Ferry service exceeds the relative low-income ridership of the system as a whole by 11%. Assuming that Chase Center ferry riders will have a similar demographic profile to the Oracle Ferry riders, we can conclude that the introduction of this service does not disproportionately benefit non-low-income riders.

Table 3. Income on the Oracle Ferry vs All Ferry Routes

	Oracle Ferry	All Ferry	Difference
Less than \$75,000	57%	46%	-11%
\$75,000 and up	35%	40%	5%
Refused to Answer	7%	13%	

For GGF as a whole, 30% of all ferry riders identify as an ethnicity other than “White, non-Hispanic,” or in other words, as a member of a minority group. In comparison, 39% of Oracle Ferry riders identify themselves as minorities, meaning that the proportion of minority riders is 9% higher on the Oracle Ferry than on ferry service in general. Assuming similar demographic characteristics between Oracle Park ferry riders and the proposed Chase Center ferry riders, and based on the District’s disparate impact threshold of 10%, the proposed Chase Center ferry service will not result in a disparate impact to minority populations as a greater proportion of the projected ridership will consist of minority riders relative to the ridership of the system as a whole.

Table 4. Minority and Non-Minority on the Oracle Ferry vs All Ferry Routes

	Oracle Ferry	All Ferry	Difference
Non-Minority	61%	70%	-9%
Minority	39%	30%	9%

C. Conclusion

The proposed Chase Center ferry service will neither disparately impact minority populations nor disproportionately burden low-income residents or riders under the District's Title VI Policies.

EXHIBIT A: Resolution Adopting of Title VI Policies (Attached).

EXHIBIT A

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2013-078

**APPROVE ADOPTION OF POLICIES FOR GOLDEN GATE TRANSIT
AND GOLDEN GATE FERRY SERVICE AND FARE CHANGES,
UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**

August 9, 2013

WHEREAS, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) operates Golden Gate Transit (GGT) bus service and Golden Gate Ferry (GGF) service, both of which are public transportation services that occasionally receive federal funding to maintain or improve service scope and quality; and,

WHEREAS, on November 15, 2012, staff presented the Transportation Committee (Committee) with an overview of Title VI as applied to federal funding recipients, such as the District, subject to the new Circular Order issued by the Federal Transit Administration (FTA); and,

WHEREAS, on February 22, 2013, the Board approved the first action required by the new FTA Circular by adopting the required service standards and policies; and,

WHEREAS, to further comply with the new FTA Circular, the District must establish the following three policies: a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy (Three Policies); and,

WHEREAS, the Three Policies will guide when and how the District analyzes the effects of potential future fare and service changes on minority and low-income populations and, in the event the District finds disparities, the District must evaluate whether there is an alternative that has a more equitable impact; and,

WHEREAS, the new FTA Circular requires transit providers, such as the District, to solicit and consider public input before establishing such policies; and,

WHEREAS, staff presented the Three Policies to the Committee on June 13, 2013, and the Committee recommended and the Board, by Resolution No. 2013-054 at its meeting of June 14, 2013, authorized the setting of a public hearing on a proposal to establish policies for Golden Gate Transit and Golden Gate Ferry Service and for fare changes under Title IV of the Civil Rights Act of 1964 as amended; and,

WHEREAS, the District conducted outreach relative to this proposal, as follows: (1) a press release was issued on July 17, 2013; (2) information was posted on the District's website, emailed to District's opt-in subscription lists and community-based organizations, posted on District's social media sites, and published as advertisements and legal notices in several periodicals including *San Francisco Chronicle*, *Marin Independent Journal* and the *Santa Rosa Press Democrat*; (3) Public Outreach Meetings were held on July 8, 2013 in Marin City, on July 9, 2013 in Novato, and on July 10, 2013 in Rohnert Park; and, (4) Spanish translations of printed materials, website information, and community meetings were available at all public outreach meetings and at the public hearing; and,

WHEREAS, public comments on the Three Policies could be submitted by either attending the public hearing or the public outreach meetings, emailing publichearing@goldengate.org or sending written comments to the District; and,

WHEREAS, due to concerns about Marin City residents not having received sufficient advance notice of the opportunity to comment on the Three Policies, the District extended the comment period by two weeks and held an additional public outreach meeting at the Marin City Library on July 25, 2013; and,

WHEREAS, seven public comments were received by the District as of July 25, 2013, and while several comments were related to the overall topic of Title VI, none of the comments were specific to the Three Policies; and,

WHEREAS, complete copies of the Three Policies and staff's underlying analysis, as well as a summary of the comments received and staff responses, are included herein as Attachments; and,

WHEREAS, the Transportation Committee at its meeting of August 2, 2013, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves adoption of policies for Golden Gate Transit and Golden Gate Ferry Service and fare changes, under Title VI of the Civil Rights Act of 1964, as amended, and attached hereto.

RESOLUTION NO. 2013-078

BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013

PAGE 3

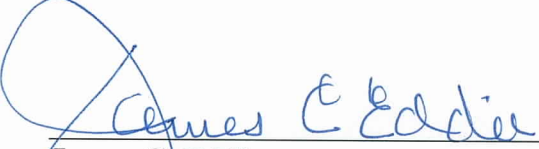
ADOPTED this 9th day of August 2013, by the following vote of the Board of Directors:

AYES (15): Directors Arnold, Belforte, Breed, Cochran, Fredericks, Moylan, Pahre, Rabbitt, Reilly, Sears, Snyder, Sobel and Theriault; Second Vice President


Stroeh; President Eddie

NOES (0): None

ABSENT (4): Directors Campos, Wiener and Yee; First Vice President Grosboll


James C. Eddie
President, Board of Directors

ATTEST:


Janet S. Tarantino
Secretary of the District

Attachment 1 - Three Policies and Analysis

Attachment 2 - Summary of Comments Received and Staff Responses

ATTACHMENT 1

Proposed Title VI Policies Pertaining to Major Service Changes, Disparate Impacts, and Disproportionate Burdens

Major Service Change Policy

The District must ensure that its services are provided equitably, without discrimination based on race, color, national origin or socio-economic status. To that end, the District must evaluate potential “major” service changes and all fare changes (except for those specifically exempt in the FTA Title VI Circular, such as Spare-the-Air Days and short-term promotional service demonstrations or fare decreases) for their impact on low-income and minority populations in its service area. Before this can occur, the District must adopt a Major Service Change policy to provide a concrete basis for determining which service changes need to be analyzed for equity.

Staff proposes the following for the District’s Major Service Change Policy:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Staff further proposes the following exemptions such that these changes would not be subject to a Title VI Equity Analysis:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (such as promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The following examples will assist the public in understanding the impact of the proposed policy.

- Example 1: If Route 11 has 20 trips a day, and the District proposes to cancel six of those trips (30%) in January 2014, then that is a major service change, and a Title VI Equity Analysis must be completed. However, if only four trips are proposed for cancellation (20%), then no analysis is required. If the District cancels these four trips and then decides to cancel two more trips in January 2015 on this same Route 11, then the percentage will again be 30% over a twenty-four month period, and an analysis will be required.
- Example 2: If Route 12 has eight trips per day and four trips are proposed for cancellation, then under the proposed policy, a Title VI Analysis is not required because the route has fewer than ten total trips per day. However, if the entire route is proposed for cancellation, then an analysis is required.
- Example 3: If Route 13 is introduced in January 1, 2014 as a demonstration service, and the District proposes to discontinue it effective December 31, 2015, then no analysis

is required when the service is introduced or discontinued. However, if the District proposes to continue the service beyond January 1, 2015, then an analysis is required for it to continue, and for it to be discontinued thereafter.

- Example 4: If Route 14 operated four times a day from Corte Madera to Petaluma, and the District planned to cease operating this trip while another transit system planned to operate the same route four times a day at the same times, with the same or better fares and transfer options, then no analysis would be required.

Disparate Impact and Disproportionate Burden Policies

When a fare change or major service change is proposed, the District must analyze whether the change will result in a fair distribution of both negative effects (such as service cuts or fare increases) and positive effects (service expansions or fare reductions, such as new discounts).

In the case of the Disparate Impact Policy, the analysis focuses on whether minority riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-minority riders or residents.

Similarly, in the case of the Disproportionate Burden Policy, the analysis focuses on whether low-income riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-low-income riders or residents.

Disparate Impact Policy

In conducting equity analyses, the Disparate Impact policy provides the threshold used to determine whether greater negative impacts – or lesser positive impacts – on **minority** riders and residents are significant.

If a proposed action would have a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or a benefit that would be available to non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. If no option with a less disparate effect exists, the District must take measures to mitigate the impact of the proposed action on the affected minority population **and** demonstrate that a legitimate business purpose cannot otherwise be accomplished.

Staff proposes the following for the District's Disparate Impact Policy:

1. The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The question that must be answered for every major service change and every fare change is: are minority riders more negatively affected (or less positively affected) by this change than riders as a whole? This is determined primarily by calculating the percentage of minority riders on

Golden Gate buses (or ferries, for a ferry service or fare change) and by calculating the percentage of minority riders affected by the change. If minorities represent a higher percentage in the impacted group than in the general ridership as a whole, the question is, how much higher? If the difference is ten percent or higher, then there is a disparate impact. As a secondary aspect of, and important precursor to, this comparative analysis, the District must define the adverse effects and/or benefits being measured for the change in question.

Some hypothetical examples of how the policy could be applied follow:

- Example 1: The District proposes to discontinue Route 16. Fifty percent of Route 16's riders belong to a minority group. If ridership on the District's bus service as a whole is 35% minority, the difference in the percentage of affected riders who are minorities and the percentage of all bus riders who are minorities is 15 percentage points. That indicates that there is a disparate impact on minority riders, and in this situation, the District would be required to evaluate whether there is an alternative with a less disparate impact on minority riders. If there is no other alternative, the District would need to mitigate the negative impact of the service cancellation on minority riders **and** demonstrate that the service reduction serves a legitimate business purpose that cannot be accomplished with less impact on minority riders.
- Example 2: The District proposes to raise fares from Zone 4 to Zone 1 by 10% and the rest of the fares only 5%. Whereas the overall ridership is 35% minority, if Zone 4 to Zone 1 riders is, for example, 46% minority, then the difference between the two groups is 11 percentage points, exceeding the 10% threshold, and there would be a disparate impact. The District would have to seek alternatives with a more equitable impact. If no such alternatives are available, then the District would have to mitigate the impact on minority riders **and** demonstrate that this fare increase serves a legitimate business purpose that cannot be accomplished in another less-discriminatory way.

Disproportionate Burden Policy

As with the Disparate Impact Policy, the Disproportionate Burden Policy comes into play when a fare change or major service change is analyzed for its equity. In this case, staff determines whether **low-income** riders and residents bear a disproportionate burden of the negative effects of – or enjoy a disproportionately low benefit from – the proposed change.

The proposed Disproportionate Burden Policy is very similar to the proposed Disparate Impact Policy and reads as follow:

2. The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

If, in the course of performing a Title VI Equity Analysis, the District finds that a proposed fare or major service change has a negative impact that affects low-income riders as compared to

non-low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income riders more than low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. Otherwise, the District must take measures to mitigate the impact of the proposed action on the affected low-income population.

Again, illustrative examples can make the uses of the policy more transparent:

- Example 1: The District proposes to discontinue Route 16. The ridership of Route 16 is 66% low-income. If ridership on the District's bus service as a whole is 50% low-income, then the difference between the low-income ridership of the Route 16 and the overall bus ridership is 16 percentage points, which means this change exceeds the threshold for disproportionate burden, or in other words, that low-income riders are bearing a disproportionate burden of this service change. In this situation, the District would be required to take measures to mitigate or lessen the impact of this change on the low-income riders of Route 16.
- Example 2: The District proposes to cut four trips on Route 21. The ridership of Route 21 is 45% low-income. If the ridership on the District's bus service as a whole is 50% low-income, then the difference is negative five percentage points (meaning the affected ridership is five percent less low-income than the overall ridership), and the burden of this change does not fall more on low-income riders than on riders as a whole.
- Example 3: The District proposes to add a new route. The residents of the areas served are 25% low-income. If the District's ridership as a whole is 50% low-income, those benefiting from the service addition are 25% less low-income than the overall ridership. There is a disproportionate benefit, and the District would be required to consider options for mitigating this disproportion.

ATTACHMENT 2

Summary of Comments Received and Staff Responses

1. **Comment:** Special fares for minorities?? Racism of the worst order.

Staff response: The public comment process is not about setting special fares for minorities but instead setting a framework for evaluating the impacts of future service or fare changes on disadvantaged communities.

2. **Comment:** I have been advocating for Title VI populations in Marin City. In order to get proper notification to minority and low-income populations adequate communication must be provided as an outreach mechanism to ensure against a community not being left out. Inasmuch as this did not happen in Marin City, where both low-income and minority residents were left out with no notification of an Open House on July 8 at the Senior Center, there is a violation of Title VI. I noticed an 8 1/2 by 11 inches poster (only one hour before the meeting) at the Marin City Hub. This was another disappointment to me and others in our community. Our shuttle service is inadequate for serving our community because of the hilly terrain.

Staff response: Given concern about the adequacy of the notification process for Marin City residents, the public comment period was extended by two weeks, additional communications were sent out, notices were posted at all bus stops in that community, and leaflets were handed out to bus riders advising that an additional public outreach meeting was scheduled in Marin City. The proposed policies are specific to regional bus and ferry services operated by the Golden Gate Bridge Highway and Transportation District. Shuttle and other fixed route and demand responsive service operated by Marin Transit and policies related to those services are the responsibility of Marin Transit.

3. **Comment:** I'm glad that you're having an additional comment period for Marin City, but in the future it's important that more advertising and outreach is implemented. Many residents were unaware about the meeting and the comment period.

Staff response: See response to Comment #2. Future outreach efforts in Marin City will include more extensive communication efforts.

4. **Comment:** It appears the proposals brought to the hearing are all about raising fares and arguing about whether or not the District can raise some and not others without discrimination. The point should be THERE SHOULD BE NO FARE INCREASES, BUT FARE DECREASES.

Staff response: The proposed policies provide a framework to evaluate future potential service and fare changes. No fare changes are proposed at this time.

5. **Comment:** The District's Allocation of resources between bus and ferry services needs to be re-evaluated in view of Title VI. There is a disproportionate amount of resources going to wealthy ferry riders and not to low-income bus riders.

Response: Duly noted. The proposed policies do not address specific to the District's allocation of transit resources between modes. The District plans to analyze the demographic characteristics of its ferry and regional bus riderships.

6. **Comment:** The job of the Golden Gate Transit District is to provide public transportation, in order to reduce automobile traffic and provide a reasonable-cost alternative to driving. The job of the District is transportation, NOT social justice, affirmative action or welfare. All this would do is raise the cost of transportation due to the additional resources needed to determine, implement and monitor these Title VI items. It is ridiculous to put the Transit District into this situation. The \$5,000 to conduct this initial public hearing will be pocket change to the cost of implementation. The bottom line is stick to your primary objective and tell the feds to make their own determinations that the Transit District is discriminatory, and make them prove it. Focus on serving the communities you service, while keeping costs down, and not on Washington D.C's social justice schemes.

Response: The proposed policies and overall compliance with Title VI is a condition of the District continuing to receive federal financial assistance for its public transportation programs.

7. **Comment:** I oppose any fare increases for the Golden Gate transit ferries, buses and bridge. The fares are exorbitant as they are now and are a huge burden on the average person's finances. This is supposed to be PUBLIC transportation, not ELITE transportation. It is only affordable to the rich.

Response: The proposed policies are not specific to any fare increase at this time. They will be used to evaluate future fare increase proposals.

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Agenda Item No. (6)

To: Finance-Auditing Committee/Committee of the Whole
Meeting of September 26, 2019

From: Ron Downing, Director of Planning
Joseph M. Wire, Auditor-Controller
Denis J. Mulligan, General Manager

Subject: **APPROVE ACTIONS RELATIVE TO ADOPTION OF THE MEANS-BASED FARE PROGRAM FOR GOLDEN GATE BUS AND GOLDEN GATE FERRY, APPROVAL OF THE TITLE VI EQUITY ANALYSIS, AND AMEND THE MASTER ORDINANCE**

Recommendation

The Finance-Auditing Committee recommends that the Board of Directors approve actions relative to adoption of the Means-Based Fare Program as follows:

1. Adopt the Means-Based Fare Program for Golden Gate Bus and Golden Gate Ferry;
2. Approve the associated Title VI Equity Analysis; and,
3. Amend the Master Ordinance accordingly.

This matter will be presented to the Board of Directors at its meetings on September 27, 2019, for appropriate action.

Summary

Transit affordability has been highlighted as an issue in the Bay Area, particularly for regional trips that are much longer and more expensive than local trips.

On May 23, 2018, the Metropolitan Transportation Commission (MTC) approved implementation of a pilot Regional Means-Based Fare Program as a way to provide greater mobility options for low-income persons on participating transit systems in the Bay Area. Persons with income below 200% of the Federal Poverty Level (approximately \$70,000 per year for a family of four in the Bay Area) would be eligible. The pilot program is funded for 12 to 18 months, depending on how quickly the available MTC funds (which partially offset the cost of the pilot program) are expended.

Participating agencies in the program as adopted by MTC are the Golden Gate Bridge, Highway and Transportation District (District), BART, Caltrain, and SFMTA. Each agencies' participation

requires governing board approval, and the District's Board approved a resolution of support for participating in the program on July 27, 2018. The program is expected to begin in early 2020 and, as noted above, would be solely based on fares paid using Clipper cards.

The proposed means-based fares would provide a fifty percent reduction from adult cash fares as a way to provide greater mobility options for low-income persons. These fares would be available to low-income passengers on regular Golden Gate Ferry service and on all Golden Gate Transit bus trips, with two exceptions. Fares for local travel solely within Marin County and the East Bay fares that have already been reduced to accommodate BART's "Early Bird Express" service that Golden Gate Transit operates on behalf of BART will not be part of this program due to already being discounted below regular GGT fares. Because MTC's demonstration project could span more than one fiscal year, the proposed means-based fares for the current fiscal year (FY 19/20), along with fares effective July 1, 2020 for FY 20/21, and fares effective July 1, 2021 for FY 21/22, are shown in Appendix A, if the program continues into that fiscal year. If adopted, the Master Ordinance will be amended accordingly to reflect the means-based fares for these three fiscal years. Should the means-based fare program continue beyond June 30, 2021, which is the end of the current Five-Year Fare Program, the means based fares could be reflected in the fare tables for the next Five-Year Fare Program.

Public Involvement Process and Comments Received

Public Notification

Outreach on the proposal to implement a pilot program for means-based fares began on July 26, 2019 when the Board approved holding a public hearing on August 22, 2019, and the public comment period closed at 4:30 p.m. on Friday, August 23, 2019.

Public notification activities included:

- Advertisements in local publications (*Marin Independent Journal*, *Santa Rosa Press Democrat*, *San Francisco Chronicle*, and *La Voz*);
- Ferry terminal signage advertising the Public Hearing;
- Posters placed onboard buses;
- Press Releases to local media;
- Social media postings on Facebook and Twitter; and,
- Email blast to customers and community-based organizations.

Translation of all printed materials and handouts in Spanish will be available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal to establish a means-based fare for Golden Gate Transit Bus and Golden Gate Ferry service, service could have been submitted in several different ways:

1. Attend the public hearing;
2. E-mail publichearing@goldengate.org; and/or,
3. Send written comments to the District Secretary.

The District's practice is to treat all comments equally without regard to the manner in which the comments are submitted or received. Therefore, individuals do not have to attend the public hearing and provide testimony in person if they have commented through e-mail or written forms. All comments received through the above methods will be considered in the final recommendation, provided that they were received by close of business, at 4:30 p.m. on Friday August 23, 2019.

Comments Received

Eighteen (18) comments were received regarding the proposal to adopt means-based fares. Eleven (11) commenters supported the proposal, stating either that they were in favor of it because of the benefit that would be made available to low-income riders, or they would personally benefit from the reduced fares. Four (4) commenters were opposed, one (1) was opposed to the fares being available during peak periods but supported means based fares during off-peak periods, and two (2) comments were received that were unrelated to the proposal). Staff responses to the comments received in opposition to the proposal and those neither in support of nor opposed to the proposal are shown in Appendix B.

Title VI Equity Analysis

Because this proposal creates a new fare, the proposal is required to undergo a Title VI Equity Analysis to accompany the final recommendation to the Board, which is expected to occur on September 27, 2019. This analysis was completed after the Public Hearing in order to reflect any public comments received on the proposal to implement this service.

In accordance with the Federal Transit Administration regulations and guidance implementing Title VI of the Civil Rights Act of 1964 as well as the District's Title VI Policies, staff conducted a Title VI Equity Analysis to determine whether the proposed means-based fare would result in a disparate impact to minority populations or impose a disproportionate burden on low-income populations in the District's service area.

Overall, the staff analysis concluded that low-income riders would benefit from the program, and though non-minority riders would benefit slightly more than minority riders, the discrepancy between the benefits was very small, only 1.25% on Ferry and 2.7% on Bus. These percentages are well within the 10% threshold the District has established for determining a Disparate Impact. Therefore, the proposal results in neither a Disproportionate Burden on low-income riders nor a Disparate Impact on minority riders.

The detailed Title VI Equity Analysis of the proposed means-based fares discount is shown in Appendix C.

Fiscal Impact

The extent of annual revenue loss has been estimated by MTC to be approximately between \$500,000 and \$1,000,000 per year for the District's bus and ferry services. Of this amount, regional funding of between \$300,000 and \$500,000 would be available to offset a portion of the lost revenue. Again, these amounts are solely estimates and are dependent on actual participation rates by the District's low-income customers. MTC's estimates do not include any assumptions for fare elasticities or ridership changes. The offset funds currently are programmed by MTC from SB-1 funds, the statewide gas tax. Nonetheless, the fiscal impact to the District could be between \$200,000 and \$500,000 per year and will be confirmed once there is actual operating experience after the means-based fare program is launched.

Attachments: Appendix A, Proposed FY Means-Based Fare Program Fare Tables– FY 19/20 through FY 21/21
Appendix B, Public Comments and Staff Responses to the Proposal for Means-Based fares
Appendix C, Title VI Equity Analysis

<u>BUS FY19-20</u>		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.25	\$3.50	\$3.75	\$4.25	\$6.50	\$6.50	\$3.50
Marin County	2	\$3.50		\$1.80		\$4.25	\$4.75	\$3.00
	3	\$3.75				\$4.00	\$4.25	
	4	\$4.25				\$3.50	\$3.50	
Sonoma County	5	\$6.50	\$4.25	\$4.00	\$3.50	\$2.25		\$5.75
	6	\$6.50	\$4.75	\$4.25	\$3.50			\$5.75
East Bay	7	\$3.50		\$3.00		\$5.75	\$5.75	\$2.00

FERRY FY19-20

Larkspur	\$6.25
Sausalito	\$6.50
Tiburon	\$6.50

<u>BUS FY20-21</u>		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.25	\$3.75	\$3.75	\$4.50	\$6.75	\$6.75	\$3.50
Marin County	2	\$3.75	\$1.80			\$4.50	\$4.75	\$3.25
	3	\$3.75				\$4.25	\$4.50	
	4	\$4.50				\$3.50	\$3.50	
Sonoma County	5	\$6.75	\$4.50	\$4.25	\$3.50	\$2.25		\$6.00
	6	\$6.75	\$4.75	\$4.50	\$3.50			\$6.00
East Bay	7	\$3.50	\$3.25			\$6.00	\$6.00	\$2.00

FERRY FY20-21

Larkspur	\$6.50
Sausalito	\$6.75
Tiburon	\$6.75

BUS FY21-22

		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.50	\$4.00	\$4.00	\$4.50	\$7.00	\$7.00	\$3.50
Marin County	2	\$4.00	\$1.80			\$4.50	\$4.50	\$3.25
	3	\$4.00				\$4.50	\$4.50	
	4	\$4.50				\$3.75	\$3.75	
Sonoma County	5	\$7.00	\$4.50	\$4.50	\$3.75	\$2.50		\$6.25
	6	\$7.00	\$4.50	\$4.50	\$3.75			\$6.25
East Bay	7	\$3.50	\$3.25			\$6.25	\$6.25	\$2.00

FERRY FY21-22

Larkspur	\$6.75
Sausalito	\$7.00
Tiburon	\$7.00

APPENDIX B

Staff Responses to Public Comments

Summary

At the close of the public comment period on August 22, 2019, there were 18 unique comments received by the Golden Gate Bridge, Highway and Transportation District (District). Of these 18 comments, 11 (61%) expressed support for the proposal (“Proposal”), 4 (22%) expressed opposition to the Proposal, 2 (11%) expressed an opinion unrelated to the Proposal, and 1 (6%) expressed opposition to the proposal but supported off-peak means-based fares.

Comments on the Proposal

Comments Made in Support of the Proposal

The District received 11 comments in support of the Proposal. Of the 11 comments, eight (8) comments were in favor of the Proposal in general and three (3) comments were in support of the Proposal, indicating they would utilize the program.

Comments Neither Opposed nor in Favor to the Proposal

Two (2) comments were received neither in support of the Proposal nor in opposition to the Proposal. Of these, one (1) comment expressed support for a higher bridge toll and lower transit fare. The second commenting individual made comments but did not address the Proposal.

Comments Made in Opposition to the Proposal

The District received four (4) comments expressing opposition to the Proposal. Of the four comments received in opposition to the Proposal, several specific themes were mentioned. The themes of these four unique comments are addressed below.

Comment: Not in Favor of Full-Fare Paying Riders Cross-Subsidizing Means-Based Fare Paying Riders (2)

Two individuals commented that they were under the impression that full-fare paying bus and ferry riders will be cross-subsidizing the lower means-based fare riders through higher fares or through their current fares. In actuality, no fare increase is proposed to offset the means-based fare Proposal and the program will be partially funded through the Metropolitan Transportation Commission (MTC). This offset could be up to half or higher to cover any revenue lost through the means-based Proposal. The remaining revenue loss is not expected to be significant and will be covered by the District’s operating budget, which is primarily funded by bridge tolls.

Comment: The Metropolitan Transportation Commission Should Run Program and Finance the Discount (1)

One comment was received expressing support for a means-based program run by the MTC, not the District. This comment suggests MTC offer a 25 percent discount but fails to take into account that as part of the Proposal, MTC will be funding up to half or more

of the estimated revenue losses. Overall, the estimated revenue loss to the District is expected to represent less than ½ (one half) of a percent of the District's operating budget.

Comment: The Non-Profit Sector Should Run Program and Finance the Discount (1)

One individual expressed support for a means-based program run by a non-profit sector organization so that the District is not burdened with the logistics of administering the program. The Proposal does recognize that there may be some costs incurred to the District from program administration but does not expect them to be significant. The MTC will be reimbursing the District as much as half of fare revenue loss or more based on initial estimates, which could offset program administration costs.

Comments Expressing Partial Support for the Proposal

The District received one (1) comment expressing partial support for the means-based fare discount Proposal during the off-peak period.

Comment: In Favor of Means-Based Fares on Off-Peak Ferry Trips Only (1)

One comment expressed support for the Proposal during the off-peak ferry period. This individual was concerned that during the peak period there may be an increase in demand that would at times displace full-fare paying riders on already crowded and sold-out ferry departures. Comment noted. The intent of the program is to make transit more affordable for low-income individuals on all trips, including during commute times when low-income individuals may be travelling to work.

APPENDIX C
Title VI Equity Analysis: Means-Based Fare Program
Presented to the Golden Gate Bridge, Highway and Transportation District
Finance-Auditing Committee
September 26, 2019

I. Background

On May 23, 2018, the Metropolitan Transportation Commission (MTC) approved implementation of a pilot Regional Means-Based Fare Program as a way to provide greater mobility options for low-income persons on participating transit systems in the Bay Area. Persons with income below 200% of the Federal Poverty Level (approximately \$70,000 per year for a family of four in the Bay Area) would be eligible. MTC has funded the program for 12 to 18 months, depending on how quickly the available funds (which partially offset the cost of the program) are expended.

The proposed means-based fares would establish a fifty percent reduction from the regular cash fares for low income persons for all Golden Gate Transit (GGT) bus and Golden Gate Ferry (GGF) fares. The District's proposed program will exclude fares for local travel solely within Marin County; East Bay fares that have already been reduced to accommodate BART's "Early Bird Express" service that Golden Gate Transit operates on behalf of BART; as well Oracle Park Special Event ferry service and Chase Center ferry service fares. The proposed fares would only be available through the use of a Clipper® card.

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin by recipients of federal financial assistance. Before the Golden Gate Bridge, Highway and Transportation District's (District) Board of Directors (Board) can adopt the proposed fare changes and opt into the program, the Board must consider whether the proposed changes will disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area. The required components of this Title VI Equity Analysis are set forth in the Federal Transit Administration's regulations and FTA Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients") implementing Title VI of the Civil Rights Act of 1964, and in the District's Title VI Policies. This analysis indicates that the proposed Means Based Fare Program does not have a disparate impact on minority riders nor a disproportionate burden on low-income riders of either GGT or GGF services.

II. Adopted District Title VI Policies

The District adopted its Major Service Change, Disparate Impact and Disproportionate Burden Policies (together referred to as "Title VI Policies") on August 9, 2013. The latter two policies set forth the standards used in fare equity analyses. The District's Disparate Impact policy provides:

- The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The District's Disproportionate Burden Policy provides:

- The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

The public outreach process, comments received and the resolution evidencing the Board's discussion and approval of the policies is attached as Exhibit A.

III. Golden Gate Transit Bus and Golden Gate Ferry Services

The fare change proposal concerns both GGT and GGF services, which are summarized by mode below.

GGT Bus Services

GGT bus services are generally delineated as "Commute" and "Basic." Generally, "Commute" bus service is peak-period, one-directional service between Sonoma or Marin County and San Francisco, plus shuttle-type routes designed specifically to take passengers from their places of origin to/from the primary Commute routes. "Basic" bus service, on the other hand, operates seven days a week over most of the day/night to provide basic mobility throughout the District's service area. More specifically:

- *Transbay Commute Service* provides commute service during morning and afternoon peak-hour periods. Commute routes operate Monday through Friday, except designated holidays, and serve San Francisco, Marin, and Sonoma counties. Commute routes include Routes 2, 4, 8, 18, 24, 25, 27, 31, 38, 44, 54, 56, 58, 72, 72X, 74, 76, 92, and 101X. Route 72X is supported by MTC Regional Measure 2 (RM2) funds generated through regional bridge tolls administered by the Bay Area Toll Authority (BATA).
- *Transbay Basic Service* provides daily service throughout the day and evening between San Francisco, Marin, Sonoma, and Contra Costa counties. Basic routes include Routes 30, 40, 40X, 70, and 101. Route 40 service, which operates between Marin and Contra Costa Counties, is supported by RM2 funds. Route 101 also receives some RM2 funding.

Golden Gate Ferry Services

The District's GGF service includes five routes between Marin County and San Francisco: Sausalito, Larkspur, Tiburon commute service, Special Event service to Oracle Park, and Chase Center Special Event service. Regular Ferry service operates daily except on Thanksgiving, Christmas, and New Year's Day.

- *Sausalito Ferry Service* provides daily connections between the GGF landing in Sausalito and the San Francisco Ferry Terminal. This 5.5 nautical-mile route has been in operation since 1970 and currently provides 18 crossings on weekdays and 12 crossings on weekends and holidays. The service operates between 7:10 am and 8:20 pm on weekdays, and between 10:40 am and 7:15 pm on weekends and holidays.
- *Larkspur Ferry Service* features an 11.25 nautical-mile route between the Larkspur Ferry Terminal and the San Francisco Ferry Terminal. The 40 weekday and eight weekend/holiday crossings require a fleet of five vessels. Services operate between 5:45 a.m. and 10:05 p.m. on weekdays, and between 9:30 a.m. and 8:10 p.m. on weekends and holidays.
- *Tiburon Ferry Commute Service* provides weekday trips in both directions during the commute hours only (5:35 a.m. to 9:10 a.m. and 4:25 p.m. to 7:55 p.m.). This 6.84 nautical-mile route was previously operated by the Blue and Gold Fleet since 1997 and before that by the Red and White Fleet.
- *Special Event Service to Oracle Park* is offered during all San Francisco Giants' home games and a number of other special events. The 13.1 nautical-mile route between the Larkspur Ferry Terminal and the dock at Oracle Park requires approximately 60 minutes. One round trip is offered for each event served, which typically totals between 80 and 90 trips per year.
- *Special Event Service to Chase Center* will be offered during all Golden State Warriors' home games and a number of other special events beginning in October 2019. The 13.1 nautical-mile route between the Larkspur Ferry Terminal and the dock at Oracle Park requires approximately 60 minutes. One round trip is expected to be offered for most events, depending on the schedule of Golden State Warriors games and other special events as well as the availability of ferry boats. While event schedules are still being finalized for the 2019-2020 season, it appears that they will be in the range of about 200 events per year.

Note that the means-based fare program will not apply to the Oracle Park or Chase Center Special Event Service.

Map 1. Golden Gate Transit and Ferry Service Area

IV. The Proposed Means-Based Fare Program Outreach

Public Notification

Outreach on the proposal to add this service began after the Board authorization to hold this public hearing on July 26, 2019, and continued into mid-August prior to the public hearing. Public notification activities included:

- Advertisements in local publications (*Marin Independent Journal*, *Santa Rosa Press Democrat*, *San Francisco Chronicle*, and *La Voz*);
- Ferry terminal signage advertising the Public Hearing;
- Posters placed onboard buses;
- Press Releases to local media;

- Social media postings on Facebook and Twitter; and,
- Email blast to customers and community-based organizations.

Translation of all printed materials and handouts in Spanish will be available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal to establish a means-based fare for Golden Gate Transit Bus and Golden Gate Ferry service, service could be submitted in several different ways:

1. Attend the public hearing;
2. E-mail publichearing@goldengate.org; and/or,
3. Send written comments to the District Secretary.

The District's practice is to treat all comments equally without regard to the manner in which the comments are submitted or received. Therefore, individuals do not have to attend the public hearing and provide testimony in person if they have commented through e-mail or written forms. All comments received through the above methods will be considered in the final recommendation, provided that they were received by close of business, at 4:30 p.m. on Friday August 23, 2019.

Comments Received

Eighteen comments were received regarding the proposal to adopt means-based fares. Eleven commenters supported the proposal, stating either that they were in favor of it because of the benefit that would be made available to low-income riders, or they would personally benefit from the reduced fares. Four commenters were opposed; two were opposed to the fares being available during peak periods but supported means based fares during off-peak periods, and two comments were received that were unrelated to the proposal. Staff responses to the comments received in opposition to the proposal and those neither in support of nor opposed to the proposal are shown in Appendix B.

V. Title VI Equity Analysis Methodology

Based on FTA Circular 4702.1B, the District must analyze any available information generated from ridership surveys that indicates whether minority and low-income passengers are more likely to use the payment types subject to the proposed fare changes.

The proposed Means-Based Fare Program includes two components:

1. A means-based fare discount on GGT Bus (with the exception of local fares within Marin County and East Bay fares already discounted to accommodate BART's Early Bird Express Service.)

2. A means-based fare discount on GGF (with the exception of Oracle Park and Chase Center special event service)

The Regional Means-Based Fare Program has been proposed in order to provide greater mobility options for low-income persons on participating transit systems in the Bay Area. Persons with income below 200% of the Federal Poverty Level (approximately \$70,000 per year for a family of four in the Bay Area) would be eligible. The program would have a duration of 12 to 18 months, depending on how quickly the available MTC funds (which partially offset the cost of the program) are expended. Participants will be required to apply for the discount through a process to be established by MTC.

Participating agencies in the program as adopted by MTC are the Golden Gate Bridge, Highway and Transportation District (District), BART, Caltrain, and SFMTA. Each agencies' participation requires governing board approval, and the District's Board approved a resolution of support for participating in the program on July 27, 2018. The program is expected to begin in early 2020 and, as noted above, would be solely based on fares paid using Clipper cards.

The proposed means-based fares would provide a fifty percent reduction from adult cash fares as a way to provide greater mobility options for low-income persons. These fares would be available to low-income passengers on regular Golden Gate Ferry service and on all Golden Gate Transit bus trips, with two exceptions. Fares for local travel solely within Marin County and the East Bay fares that have already been reduced to accommodate BART's "Early Bird Express" service that Golden Gate Transit operates on behalf of BART will not be part of this program due to already being discounted below regular GGT fares.

<u>BUS FY19-20</u>		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.25	\$3.50	\$3.75	\$4.25	\$6.50	\$6.50	\$3.50
Marin County	2	\$3.50		\$1.80		\$4.25	\$4.75	\$3.00
	3	\$3.75				\$4.00	\$4.25	
	4	\$4.25				\$3.50	\$3.50	
Sonoma County	5	\$6.50	\$4.25	\$4.00	\$3.50	\$2.25		\$5.75
	6	\$6.50	\$4.75	\$4.25	\$3.50			\$5.75
East Bay	7	\$3.50		\$3.00		\$5.75	\$5.75	\$2.00

FERRY FY19-20

Larkspur	\$6.25
Sausalito	\$6.50
Tiburon	\$6.50

BUS FY20-21

		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.25	\$3.75	\$3.75	\$4.50	\$6.75	\$6.75	\$3.50
Marin County	2	\$3.75	\$1.80			\$4.50	\$4.75	\$3.25
	3	\$3.75				\$4.25	\$4.50	
	4	\$4.50				\$3.50	\$3.50	
Sonoma County	5	\$6.75	\$4.50	\$4.25	\$3.50	\$2.25		\$6.00
	6	\$6.75	\$4.75	\$4.50	\$3.50			\$6.00
East Bay	7	\$3.50	\$3.25			\$6.00	\$6.00	\$2.00

FERRY FY20-21

Larkspur	\$6.50
Sausalito	\$6.75
Tiburon	\$6.75

BUS FY21-22

		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.50	\$4.00	\$4.00	\$4.50	\$7.00	\$7.00	\$3.50
Marin County	2	\$4.00	\$1.80			\$4.50	\$4.50	\$3.25
	3	\$4.00				\$4.50	\$4.50	
	4	\$4.50				\$3.75	\$3.75	
Sonoma County	5	\$7.00	\$4.50	\$4.50	\$3.75	\$2.50		\$6.25
	6	\$7.00	\$4.50	\$4.50	\$3.75			\$6.25
East Bay	7	\$3.50	\$3.25			\$6.25	\$6.25	\$2.00

FERRY FY21-22

Larkspur	\$6.75
Sausalito	\$7.00
Tiburon	\$7.00

As a result, the District is required to conduct multiple Title VI Equity Analyses to determine whether any elements of the proposal will result in a disparate impact to minority populations or a disproportionate burden on low-income populations using both GGT and GGF, based on the District's Title VI Policies.

Staff developed and applied the following methodology:

- 1. Identify Ridership Data Sources**

Data: 2018 District System-wide Survey

In 2018, the District participated in the MTC's region-wide survey. The consultant selected by MTC and by District Staff surveyed all of the District's services, including GGT and GGF. Data was collected on board a sample of bus and ferry trips. Questionnaires were in Spanish and English and included questions about the trip being taken and demographics.

- 2. Analyze the percent change of the proposed fare adjustment for each fare payment method.**

As described above, terms of the District's proposed participation in the program would establish a fifty percent reduction from the regular cash fares for low income persons for all GGT and GGF fares, with the exception of fares for local travel solely within Marin County; the East Bay fares that have already been reduced to accommodate BART's "Early Bird Express" service that GGT operates on behalf of BART; and Oracle Park and Chase Center Special Event ferry services. The proposed means-based fares would only be available through the use of a Clipper card.

Accordingly, all fare payment media and fare types for the non-exempt services were examined for the level of use by low-income and minority patrons. The media and fare types examined were: Adult Cash fare, Adult Clipper fare, and Senior/Youth/Disabled ("Discount") fare. Clipper Discount fares were not analyzed separately, but were grouped with cash Discount fares, as the Discount fare amounts are the same whether the customer pays with cash or Clipper, and are not subject to further discount with the program. The means-based fare was added as a category in order to determine what percentage of patrons of each type (low-income, non-low-income, minority, and non-minority) would benefit from its introduction.

For the most conservative analysis, it was assumed that no cash-paying customers would convert to Clipper usage to take advantage of the discount.

- 3. Define the term "low-income" as those with an annual household income at or below \$50,000, which is approximately 90% of the median for the service area.**

Marin County and Sonoma Counties, which are included in the District's service area, have a comparatively high income (median income was \$97,815 for Marin County and \$60,430 for Sonoma County as of the 2012-2016 American Community Survey). In the District's most recent Title VI Program, District staff used \$54,387 for the annual income cut-off for defining low income for Marin County and Sonoma County. This figure is derived by taking 90% of the median annual income by census tract using the most recent statistics available. For this equity analysis, staff decreased the low-income threshold to \$50,000, which is the closest income strata break in the survey data, and which provides a more protective assessment of disproportionate burden for lower-income earners.

- 4. Define the term "minority" to mean those who self-identified as any ethnicity other than "white" alone in the 2018 District System-Wide Survey.**
- 5. Determine the usage of each fare product by minority, non-minority, low-income and non-low-income riders.**
- 6. Derive the differential between the usage of the means-based fare for minority riders relative to riders overall, and low-income riders relative to riders overall.**
- 8. Compare the differential between minority and riders overall to the disparate impact threshold, and the differential between low-income and riders overall to the disproportionate burden threshold.**

VI. Title VI Equity Analysis Findings

Impacts of proposed fare changes were analyzed separately for GGT and GGF.

1. GGT Bus Fare Equity Analysis

As GGT has a complex fare structure with a total of seven zones with varying fares between each zone pair, a relatively complex analysis was required. Fares vary based on three characteristics:

1. The zone pair (origin and destination);
2. The fare category (Adult Cash, Adult Clipper, Discount, and Means-Based Discount fares);
3. The fare media (Cash vs. Clipper).

Adult category passengers receive a discount when using the Clipper card, so Clipper and cash fares are different. As referenced above, because Senior, Youth, and Disabled category riders are already receiving a discount, the Clipper fare for these categories is not discounted further and is the same as the cash fare. Accordingly, the Discount fare group represents those receiving a Senior, Disabled, or Youth discount whether using cash or Clipper.

First, using data from the 2018 District System-Wide Survey, staff compared percentages of minority riders to non-minority riders by fare media and fare payment category, as well as system-wide. For the 2018 District System-Wide Survey, 1630 bus passengers provided responses to all questions required for the analysis below. As demonstrated in Table 1, 571 out of 1630 GGT riders (35%) self-identified as belonging to an ethnic minority, and 1059 (65%) identified as non-minority. The far right column in Table 2 shows that the most frequently used fare payment type on GGT is an adult Clipper fare, used by 61% of all customers. (This excludes low-income passengers, who for the purposes of this analysis have been assigned to the “Means-Based Fare” category). Following that are Adult Cash, and Means-Based fares, used by 16%, then Discount fares (Senior, Disabled, and Youth combined), at 6%.

Table 1: Bus Fare Product Usage Survey Data—Minority vs. Non-Minority

Payment Type	Minority	Non-Minority	Total
Cash Adult	131	134	265
Discount	28	71	99
Clipper Adult	324	677	1001
Means-Based	88	177	265
Total	571	1059	1630

Table 2: Bus Fare Product Usage by Percentage—Minority vs. Non-Minority

Payment Type	Minority	Non-Minority	Total
Cash Adult	8%	8%	16%
Discount	2%	4%	6%
Clipper Adult	20%	42%	61%
Means-Based	5%	11%	16%
Total	35%	65%	100%

Applying the same type of analysis to income status as to minority status, Tables 3 and 4 show that of 1,558 riders responding to the income question on the survey, 570 or 37% identified themselves as having a household income of \$50,000 or less and are considered low-income. Further, 988 riders (63%) responded as having an annual income over \$50,000. Though users of the program could potentially have an income of as high as \$70,000 annually, since data on family size is not currently available for GGT or GGF ridership, using \$50,000 as the income cap provides a more conservative estimate of usage.

Table 3: Bus Fare Product Usage Survey Data—Low-Income vs. Non-Low Income

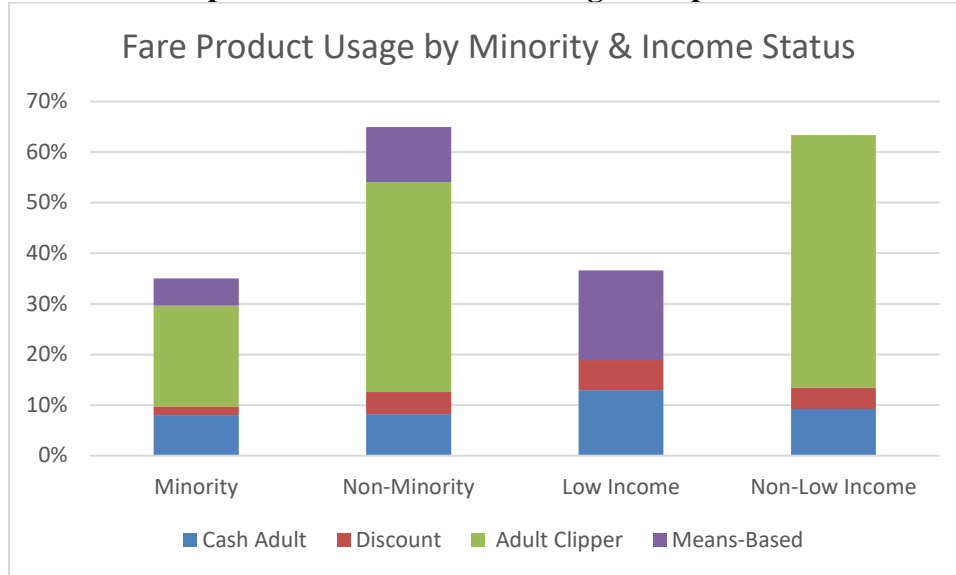
Payment Type	Low-Income	Non-Low-Income	Total
Cash Adult	201	144	345
Discount	93	66	159
Clipper	0	778	778
Means-Based	276	0	276
Total	570	988	1558

Table 4: Bus Fare Product Usage by Percentage— Low-Income vs. Non-Low Income

Payment Type	Low-Income	Non-Low-Income	Total
Cash Adult	13%	9%	22%
Discount	6%	4%	10%
Clipper	0%	50%	50%
Means-Based	18%	0%	18%
Total	37%	63%	100%

Next, staff compared the percentage of minority riders vs. non-minority riders and of low-income vs. non-low-income riders using all fare products.

Graph 1 shows the use of each fare payment type for each category of riders: minority, non-minority, low-income, and non-low-income. Note that for the purposes of this analysis, all low-income riders who use Clipper were assumed to use the Means-Based Fare discount, and so the graph shows no low-income riders paying the Adult Clipper fare. Similarly, no non-low-income customers will use the means-based fare.

Graph 1: Bus Fare Product Usage Comparison

As a last step, the Golden Gate Transit Disparate Impact and Disproportionate Burden Table (GGT DI DB Table), attached at the end of this report, illustrates the methodology for calculating effects of the Means-Based Fare Program proposal on GGT passengers. The FTA Circular states that for fare changes the appropriate comparison for a disproportionate burden analysis is between differences for each fare media between low-income riders and overall riders. Based on the charts above, the disproportionate burden analysis compares the percentage of low-income users anticipated to use the means-based fare against the usage as a percentage of all riders.

Similarly, the appropriate comparison for a disparate impact analysis is between minority riders and overall riders. Based on the charts above, the disparate impact analysis compares the percentage of low income users anticipated to use the means-based fare against the usage as a percentage of all riders.

Table 5: Bus Fare Impact Summary—Low Income and Non-Low Income

% Low Income in Overall Ridership	% of Means Based Fare Users Who Are Low Income	% of Non-Low-Income in Overall Ridership	% of Means Based Fare Users Who Are Non-Low Income	Difference between Low-Income Riders and Overall Riders	Exceeds Disproportionate Burden Threshold? (>10%)
36.60%	100%	63.40%	0%	-63.40%	No

Table 6: Bus Fare Impact Summary—Minority and Non-Minority

% Minority in Overall Ridership	% Means-Based Fare Users Who Are Minority	% Non-Minority in Overall Ridership	% of Means-Based Fare Users Who Are Non-Minority	Difference between Minority Riders and Overall Riders	Exceeds Disparate Impact Threshold? (>10%)
35.21%	32.51%	64.79%	64.79%	-2.70%	No

As expected, the positive impact of this fare proposal will be enjoyed by a greater proportion of low-income riders than their share of the overall ridership. While low-income riders are 36.6% of the ridership, they are anticipated to constitute 100% of the riders using the Means-Based Fare Program. This is a differential of -63.4%, which is less than the District's disproportionate burden threshold of 10%. Therefore the proposal doesn't constitute a disproportionate burden on low-income riders.

Minority riders are 35.21% of the ridership, and are anticipated to constitute 32.51% of means-based fare users. Accordingly, the means-based fare will disproportionately benefit non-minority riders by 2.70%. However, since the disparate impact threshold is 10%, this proposal does not constitute a disparate impact on minority riders.

2. GGF Fare Equity Analysis

GGF's fare structure is less complicated than GGT's because it does not involve various zones. The analysis of the fares is still based on three characteristics:

1. The ferry route (Sausalito, Larkspur, Tiburon);
2. The fare category (Adult, Discount, i.e., Senior, Youth and Disabled fares, and Means-Based fares);
3. The fare media: Clipper or Limited Use Tickets.

Limited Use Tickets allow passengers to purchase with cash a one-way fare, which is the fare media that replaced cash in 2011. As such, these fares will be represented by the label "Cash" in the tables for brevity's sake. Adult category passengers receive a discount when using the Clipper card, so Clipper and cash fares are different for Adult passengers. Just as with GGT, the Discount fare is the same when paying with cash or when using a Clipper card. The Discount fare group represents those receiving a Senior, Disabled, or Youth discount whether using cash or Clipper. As with the bus analysis, low-income users of Clipper fares will be assumed to enjoying the Means-Based fare in this analysis.

Using data from the 2018 District System-wide Survey, staff compared percentages of minority riders to non-minority riders by fare payment category as well as system-wide.

Tables 7 and 8 below show that 2,120 ferry passengers who used a revenue fare product (that is not a transfer or a pass) provided responses to all questions required for the analysis below. 117 Sausalito riders, 214 Larkspur riders, and 41 Tiburon riders self-identified as an ethnic minority, representing a total of 372 passengers or 17.5%. Additionally, 496 Sausalito riders, 1,079 Larkspur riders and 173 Tiburon riders identified as non-minority, representing a total of 1,748 passengers or 82.4%.

Table 7: Ferry Fare Product Usage Survey Data—Minority vs. Non-Minority

		Minority	Non-Minority	Total
Sausalito	Cash Adult	28	76	103
	Discount	10	69	79
	Clipper Adult	60	268	328
	Means-Based	19	83	102
Larkspur	Cash Adult	13	46	59
	Discount	28	120	148
	Clipper Adult	139	731	870
	Means-Based	34	181	215
Tiburon	Cash Adult	12	32	43
	Discount	4	29	33
	Clipper Adult	17	78	95
	Means-Based	8	35	43
Total		372	1748	2120

Table 8: Ferry Fare Product Usage by Percentage—Minority vs. Non-Minority

		Minority	Non-Minority	Total
Sausalito	Cash Adult	1.31%	3.57%	4.88%
	Discount	0.49%	3.24%	3.73%
	Clipper Adult	2.83%	12.66%	15.49%
	Means-Based	0.87%	3.92%	4.79%
Larkspur	Cash Adult	0.61%	2.19%	2.80%
	Discount	1.32%	5.66%	6.97%
	Clipper Adult	6.55%	34.51%	41.06%
	Means-Based	1.62%	8.54%	10.15%
Tiburon	Cash Adult	0.55%	1.50%	2.05%
	Discount	0.21%	1.36%	1.57%
	Clipper Adult	0.82%	3.67%	4.49%
	Means-Based	0.37%	1.65%	2.01%
Total		18%	82%	100%

As with the bus fares analysis, staff compared the percentage of minority riders vs. non-minority riders and overall percentages for passenger ethnicity data for all fare products, including the anticipated use of the Means-Based Fare. Staff also compared the percentage of low-income riders vs. non-low-income riders and overall percentages for passenger income data for all fare products.

Applying the same type of analysis to income categories as to minority status, Tables 9 and 10 show that 2,239 riders responded to the income question on the survey. Of these passengers, 161 Sausalito riders, 301 Larkspur riders, and 68 Tiburon riders identified as having a household income of less than \$50,000, for a total of 530 passengers or 23.66% of all ferry riders. In addition, 470 Sausalito riders, 1,043 Larkspur riders, and 197 Tiburon riders for a total of 1,710, or 76.34 percent, responded as having an annual income over \$50,000.

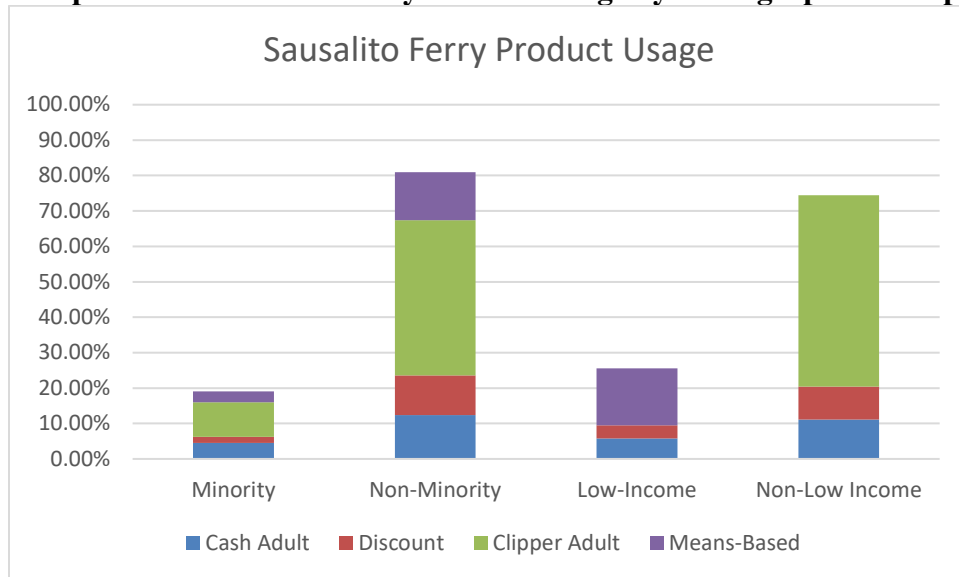
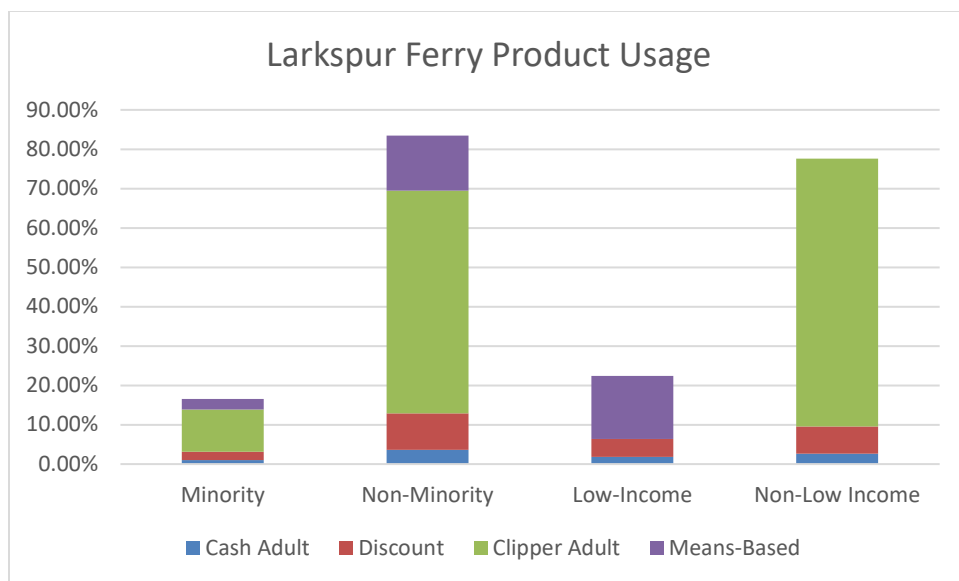
Table 9: Ferry Fare Product Usage Survey Data— Low-Income vs. Non-Low Income

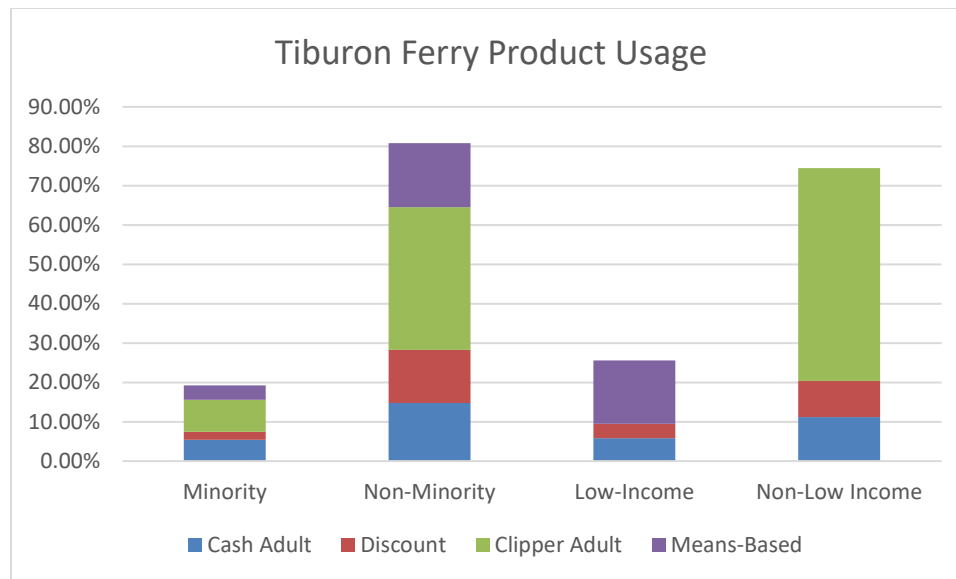
		Low-Income	Non-Low Income	Total
Sausalito	Cash Adult	37	70	107
	Discount	23	58	81
	Clipper Adult	0	341	341
	Means-Based	102	0	102
Larkspur	Cash Adult	25	35	60
	Discount	61	93	154
	Clipper Adult	0	915	915
	Means-Based	215	0	215
Tiburon	Cash Adult	15	30	45
	Discount	10	25	34
	Clipper Adult	0	143	143
	Means-Based	43	0	43
Total		530	1710	2239

Table 10: Ferry Fare Product Usage by Percentage— Low-Income vs. Non-Low Income

		Low-Income	Non-Low Income	Total
Sausalito	Cash Adult	1.64%	3.14%	4.78%
	Discount	1.02%	2.61%	3.63%
	Clipper Adult	0.00%	15.22%	15.22%
	Means-Based	4.54%	0.00%	4.54%
Larkspur	Cash Adult	1.10%	1.58%	2.68%
	Discount	2.74%	4.14%	6.87%
	Clipper Adult	0.00%	40.84%	40.84%
	Means-Based	9.61%	0.00%	9.61%
Tiburon	Cash Adult	0.69%	1.32%	2.01%
	Discount	0.43%	1.09%	1.52%
	Clipper Adult	0.00%	6.39%	6.39%
	Means-Based	1.91%	0.00%	1.91%
Total		23.66%	76.34%	100.00%

Graphs 2, 3, and 4 on pages 17 and 18 show the frequency of use of each fare payment type on Sausalito, Larkspur, and Tiburon Ferry services for each category of riders: minority, non-minority, low-income, and non-low-income, by ferry route. For each ferry route, Clipper usage is high, and low-income customers who are already using Clipper are assumed to benefit from the Means-Based Fare. Current Limited-Use ticket users may also benefit from the Means-Based Fare if they qualify.

Graph 2: Sausalito Ferry Product Usage by Demographic Group**Graph 3: Larkspur Ferry Product Usage by Demographic Group**

Graph 4: Tiburon Ferry Product Usage by Demographic Group

As a last step in the process of the equity analysis, the Disparate Impact and Disproportionate Burden Table (GGF DI DB Table), attached at the end of this report, illustrates the methodology for calculating effects of the Means-Based Fare Program proposal on GGF passengers. Based on the charts above, the disproportionate burden analysis compares the percentage of low-income users anticipated to use the means-based fare against the usage as a percentage of all riders. Similarly, the disparate impact analysis compares the percentage of low-income users anticipated to use the means-based fare against the usage as a percentage of all riders. These percent utilizations are then compared with each passenger type's overall ridership to determine whether the impact of the fare increase is felt proportionally to the overall ridership, or rather, whether a disparate impact or disproportionate burden exists.

The tables below depict the difference in impact for each rider category from that category's representation among bus ridership:

Table 11: Ferry Fare Impact Summary—Low Income and Non-Low-Income

% of Low Income Riders in Overall Ridership	% Low Income Riders Among Means-Based Fare Riders	% Non-Low Income Riders in Overall Ridership	% Non-Low Income Riders Among Means-Based Fare Riders	Difference Low-Income Users of Means-Based Fare and Percentage of Ridership	Exceeds Disproportionate Burden Threshold? (>10%)
23.66%	100%	76.34%	0%	-76.34%	No

Table 12: Ferry Fare Impact Summary—Minority and Non-Minority

% of Minority Riders in Overall Ridership	% Minority Riders Among Means-Based Fare Riders	% Non-Minority Riders in Overall Ridership	% Non-Minority Riders Among Means-Based Fare Riders	Difference between % Minority Users of Means-Based Fare and % of Ridership	Exceeds Disparate Impact Threshold?
17.57%	16.32%	82.43%	83.68%	1.25%	No

As expected, the positive impact of this fare proposal will be enjoyed to a greater extent by low-income riders than by non-low-income riders. While low-income riders are 23.85% of the ridership, they are anticipated to constitute 100% of the riders using the means-based fare program. This is a differential of -76.15%, which is less than the District's disproportionate burden threshold of 10%. Therefore the proposal doesn't constitute a disproportionate burden on low-income riders.

Minority riders are 17.57% of the ridership, and are anticipated to constitute 16.32% of means-based fare users. Accordingly, the means-based fare will disproportionately benefit non-minority riders by 1.25%. However, since the disparate impact threshold is 10%, this proposal does not constitute a disparate impact on minority riders.

C. Conclusion

GGT: As can be seen on Tables 5 and 6 on pages 12 and 13 of this report, the proposed Means-Based Fare Program will have a positive impact on low-income customers, and its impact on minority customers, though slightly less than its positive impact on non-minority customers, is within the 10% threshold established by the District. This demonstrates that there is neither a disparate impact on minority GGT riders nor a disproportionate burden on low-income GGT riders resulting from the proposed program.

GGF: As shown on Tables 11 and 12, immediately above, the proposed Means-Based Fare Program will have a positive impact on low-income customers, and its impact on minority customers, though slightly less than its positive impact on non-minority customers, is within the 10% threshold established by the District. This demonstrates that there is neither a disparate impact on minority GGF riders nor a disproportionate burden on low-income GGF riders resulting from the proposed program.

Public Outreach on the District's Proposed Title VI Policies (2013)

Prior to Board adoption of the District's Title VI Policies, public outreach regarding the policy proposals included:

- Informational meetings on July 8, 9 and 10, 2013, in Marin City, Novato and Rohnert Park, respectively, between 4:30 p.m. and 6:30 p.m.
- Legal notices published in the *Marin Independent Journal*, the *San Francisco Examiner* and the *Santa Rosa Press Democrat* on June 18 and 25, 2013
- Signage posted onboard the ferryboats, at the Ferry Terminals, at transit hubs in Marin and Sonoma counties, at major bus stops and at the Customer Service Center at the San Rafael Transit Center
- Display boards, staff report and comment forms, including Spanish translations
- A press release issued and posted to the District's web site on June 17, 2013, including links to the staff report in both English and Spanish
- A public hearing agenda and an associated staff report posted to the District's web site on July 8, 2013
- Information e-blasted to the Bus and Ferry Subscriber's list on June 20 and July 2, 2013
- Information posted to transit-specific social media channels on July 2 and July 8, 2013
- A public hearing agenda mailed to organizations and individuals on the District's mailing list on July 8, 2013, and posted on District bulletin boards.

Comments Received on the District's Proposed Title VI Policies (2013)

Of the comments received by the District, one alerted the District to the need to apply Title VI principles to the allocation of resources between bus and ferry services; one commented on the inconvenience of the time and location of the public hearing, service reliability, and driver attitudes; and another urged the District to reach out to community partners and agencies to get the word out about Title VI-related public hearings.

Attachments: Exhibit A: Public Outreach Process, Comments Received and the Resolution Adoption of Title VI Policies

Exhibit B: Bus and Ferry Disparate Impact-Disproportionate Burden Tables for Means-Based Fare Program

EXHIBIT A

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2013-078

**APPROVE ADOPTION OF POLICIES FOR GOLDEN GATE TRANSIT
AND GOLDEN GATE FERRY SERVICE AND FARE CHANGES,
UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**

August 9, 2013

WHEREAS, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) operates Golden Gate Transit (GGT) bus service and Golden Gate Ferry (GGF) service, both of which are public transportation services that occasionally receive federal funding to maintain or improve service scope and quality; and,

WHEREAS, on November 15, 2012, staff presented the Transportation Committee (Committee) with an overview of Title VI as applied to federal funding recipients, such as the District, subject to the new Circular Order issued by the Federal Transit Administration (FTA); and,

WHEREAS, on February 22, 2013, the Board approved the first action required by the new FTA Circular by adopting the required service standards and policies; and,

WHEREAS, to further comply with the new FTA Circular, the District must establish the following three policies: a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy (Three Policies); and,

WHEREAS, the Three Policies will guide when and how the District analyzes the effects of potential future fare and service changes on minority and low-income populations and, in the event the District finds disparities, the District must evaluate whether there is an alternative that has a more equitable impact; and,

WHEREAS, the new FTA Circular requires transit providers, such as the District, to solicit and consider public input before establishing such policies; and,

WHEREAS, staff presented the Three Policies to the Committee on June 13, 2013, and the Committee recommended and the Board, by Resolution No. 2013-054 at its meeting of June 14, 2013, authorized the setting of a public hearing on a proposal to establish policies for Golden Gate Transit and Golden Gate Ferry Service and for fare changes under Title IV of the Civil Rights Act of 1964 as amended; and,

WHEREAS, the District conducted outreach relative to this proposal, as follows: (1) a press release was issued on July 17, 2013; (2) information was posted on the District's website, emailed to District's opt-in subscription lists and community-based organizations, posted on District's social media sites, and published as advertisements and legal notices in several periodicals including *San Francisco Chronicle*, *Marin Independent Journal* and the *Santa Rosa Press Democrat*; (3) Public Outreach Meetings were held on July 8, 2013 in Marin City, on July 9, 2013 in Novato, and on July 10, 2013 in Rohnert Park; and, (4) Spanish translations of printed materials, website information, and community meetings were available at all public outreach meetings and at the public hearing; and,

WHEREAS, public comments on the Three Policies could be submitted by either attending the public hearing or the public outreach meetings, emailing publichearing@goldengate.org or sending written comments to the District; and,

WHEREAS, due to concerns about Marin City residents not having received sufficient advance notice of the opportunity to comment on the Three Policies, the District extended the comment period by two weeks and held an additional public outreach meeting at the Marin City Library on July 25, 2013; and,

WHEREAS, seven public comments were received by the District as of July 25, 2013, and while several comments were related to the overall topic of Title VI, none of the comments were specific to the Three Policies; and,

WHEREAS, complete copies of the Three Policies and staff's underlying analysis, as well as a summary of the comments received and staff responses, are included herein as Attachments; and,

WHEREAS, the Transportation Committee at its meeting of August 2, 2013, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves adoption of policies for Golden Gate Transit and Golden Gate Ferry Service and fare changes, under Title VI of the Civil Rights Act of 1964, as amended, and attached hereto.

RESOLUTION NO. 2013-078

BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013

PAGE 3

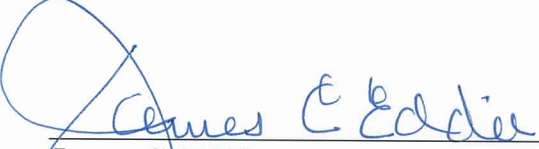
ADOPTED this 9th day of August 2013, by the following vote of the Board of Directors:

AYES (15): Directors Arnold, Belforte, Breed, Cochran, Fredericks, Moylan, Pahre, Rabbitt, Reilly, Sears, Snyder, Sobel and Theriault; Second Vice President


Stroeh; President Eddie

NOES (0): None

ABSENT (4): Directors Campos, Wiener and Yee; First Vice President Grosboll


James C. Eddie
President, Board of Directors

ATTEST:


Janet S. Tarantino
Secretary of the District

Attachment 1 - Three Policies and Analysis

Attachment 2 - Summary of Comments Received and Staff Responses

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ATTACHMENT 1

Proposed Title VI Policies Pertaining to Major Service Changes, Disparate Impacts, and Disproportionate Burdens

Major Service Change Policy

The District must ensure that its services are provided equitably, without discrimination based on race, color, national origin or socio-economic status. To that end, the District must evaluate potential “major” service changes and all fare changes (except for those specifically exempt in the FTA Title VI Circular, such as Spare-the-Air Days and short-term promotional service demonstrations or fare decreases) for their impact on low-income and minority populations in its service area. Before this can occur, the District must adopt a Major Service Change policy to provide a concrete basis for determining which service changes need to be analyzed for equity.

Staff proposes the following for the District’s Major Service Change Policy:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Staff further proposes the following exemptions such that these changes would not be subject to a Title VI Equity Analysis:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (such as promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The following examples will assist the public in understanding the impact of the proposed policy.

- Example 1: If Route 11 has 20 trips a day, and the District proposes to cancel six of those trips (30%) in January 2014, then that is a major service change, and a Title VI Equity Analysis must be completed. However, if only four trips are proposed for cancellation (20%), then no analysis is required. If the District cancels these four trips and then decides to cancel two more trips in January 2015 on this same Route 11, then the percentage will again be 30% over a twenty-four month period, and an analysis will be required.
- Example 2: If Route 12 has eight trips per day and four trips are proposed for cancellation, then under the proposed policy, a Title VI Analysis is not required because the route has fewer than ten total trips per day. However, if the entire route is proposed for cancellation, then an analysis is required.
- Example 3: If Route 13 is introduced in January 1, 2014 as a demonstration service, and the District proposes to discontinue it effective December 31, 2015, then no analysis

is required when the service is introduced or discontinued. However, if the District proposes to continue the service beyond January 1, 2015, then an analysis is required for it to continue, and for it to be discontinued thereafter.

- Example 4: If Route 14 operated four times a day from Corte Madera to Petaluma, and the District planned to cease operating this trip while another transit system planned to operate the same route four times a day at the same times, with the same or better fares and transfer options, then no analysis would be required.

Disparate Impact and Disproportionate Burden Policies

When a fare change or major service change is proposed, the District must analyze whether the change will result in a fair distribution of both negative effects (such as service cuts or fare increases) and positive effects (service expansions or fare reductions, such as new discounts).

In the case of the Disparate Impact Policy, the analysis focuses on whether minority riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-minority riders or residents.

Similarly, in the case of the Disproportionate Burden Policy, the analysis focuses on whether low-income riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-low-income riders or residents.

Disparate Impact Policy

In conducting equity analyses, the Disparate Impact policy provides the threshold used to determine whether greater negative impacts – or lesser positive impacts – on **minority** riders and residents are significant.

If a proposed action would have a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or a benefit that would be available to non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. If no option with a less disparate effect exists, the District must take measures to mitigate the impact of the proposed action on the affected minority population **and** demonstrate that a legitimate business purpose cannot otherwise be accomplished.

Staff proposes the following for the District's Disparate Impact Policy:

1. The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The question that must be answered for every major service change and every fare change is: are minority riders more negatively affected (or less positively affected) by this change than riders as a whole? This is determined primarily by calculating the percentage of minority riders on

Golden Gate buses (or ferries, for a ferry service or fare change) and by calculating the percentage of minority riders affected by the change. If minorities represent a higher percentage in the impacted group than in the general ridership as a whole, the question is, how much higher? If the difference is ten percent or higher, then there is a disparate impact. As a secondary aspect of, and important precursor to, this comparative analysis, the District must define the adverse effects and/or benefits being measured for the change in question.

Some hypothetical examples of how the policy could be applied follow:

- Example 1: The District proposes to discontinue Route 16. Fifty percent of Route 16's riders belong to a minority group. If ridership on the District's bus service as a whole is 35% minority, the difference in the percentage of affected riders who are minorities and the percentage of all bus riders who are minorities is 15 percentage points. That indicates that there is a disparate impact on minority riders, and in this situation, the District would be required to evaluate whether there is an alternative with a less disparate impact on minority riders. If there is no other alternative, the District would need to mitigate the negative impact of the service cancellation on minority riders **and** demonstrate that the service reduction serves a legitimate business purpose that cannot be accomplished with less impact on minority riders.
- Example 2: The District proposes to raise fares from Zone 4 to Zone 1 by 10% and the rest of the fares only 5%. Whereas the overall ridership is 35% minority, if Zone 4 to Zone 1 riders is, for example, 46% minority, then the difference between the two groups is 11 percentage points, exceeding the 10% threshold, and there would be a disparate impact. The District would have to seek alternatives with a more equitable impact. If no such alternatives are available, then the District would have to mitigate the impact on minority riders **and** demonstrate that this fare increase serves a legitimate business purpose that cannot be accomplished in another less-discriminatory way.

Disproportionate Burden Policy

As with the Disparate Impact Policy, the Disproportionate Burden Policy comes into play when a fare change or major service change is analyzed for its equity. In this case, staff determines whether **low-income** riders and residents bear a disproportionate burden of the negative effects of – or enjoy a disproportionately low benefit from – the proposed change.

The proposed Disproportionate Burden Policy is very similar to the proposed Disparate Impact Policy and reads as follow:

2. The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

If, in the course of performing a Title VI Equity Analysis, the District finds that a proposed fare or major service change has a negative impact that affects low-income riders as compared to

non-low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income riders more than low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. Otherwise, the District must take measures to mitigate the impact of the proposed action on the affected low-income population.

Again, illustrative examples can make the uses of the policy more transparent:

- Example 1: The District proposes to discontinue Route 16. The ridership of Route 16 is 66% low-income. If ridership on the District's bus service as a whole is 50% low-income, then the difference between the low-income ridership of the Route 16 and the overall bus ridership is 16 percentage points, which means this change exceeds the threshold for disproportionate burden, or in other words, that low-income riders are bearing a disproportionate burden of this service change. In this situation, the District would be required to take measures to mitigate or lessen the impact of this change on the low-income riders of Route 16.
- Example 2: The District proposes to cut four trips on Route 21. The ridership of Route 21 is 45% low-income. If the ridership on the District's bus service as a whole is 50% low-income, then the difference is negative five percentage points (meaning the affected ridership is five percent less low-income than the overall ridership), and the burden of this change does not fall more on low-income riders than on riders as a whole.
- Example 3: The District proposes to add a new route. The residents of the areas served are 25% low-income. If the District's ridership as a whole is 50% low-income, those benefiting from the service addition are 25% less low-income than the overall ridership. There is a disproportionate benefit, and the District would be required to consider options for mitigating this disproportion.

ATTACHMENT 2

Summary of Comments Received and Staff Responses

1. **Comment:** Special fares for minorities?? Racism of the worst order.

Staff response: The public comment process is not about setting special fares for minorities but instead setting a framework for evaluating the impacts of future service or fare changes on disadvantaged communities.

2. **Comment:** I have been advocating for Title VI populations in Marin City. In order to get proper notification to minority and low-income populations adequate communication must be provided as an outreach mechanism to ensure against a community not being left out. Inasmuch as this did not happen in Marin City, where both low-income and minority residents were left out with no notification of an Open House on July 8 at the Senior Center, there is a violation of Title VI. I noticed an 8 1/2 by 11 inches poster (only one hour before the meeting) at the Marin City Hub. This was another disappointment to me and others in our community. Our shuttle service is inadequate for serving our community because of the hilly terrain.

Staff response: Given concern about the adequacy of the notification process for Marin City residents, the public comment period was extended by two weeks, additional communications were sent out, notices were posted at all bus stops in that community, and leaflets were handed out to bus riders advising that an additional public outreach meeting was scheduled in Marin City. The proposed policies are specific to regional bus and ferry services operated by the Golden Gate Bridge Highway and Transportation District. Shuttle and other fixed route and demand responsive service operated by Marin Transit and policies related to those services are the responsibility of Marin Transit.

3. **Comment:** I'm glad that you're having an additional comment period for Marin City, but in the future it's important that more advertising and outreach is implemented. Many residents were unaware about the meeting and the comment period.

Staff response: See response to Comment #2. Future outreach efforts in Marin City will include more extensive communication efforts.

4. **Comment:** It appears the proposals brought to the hearing are all about raising fares and arguing about whether or not the District can raise some and not others without discrimination. The point should be THERE SHOULD BE NO FARE INCREASES, BUT FARE DECREASES.

Staff response: The proposed policies provide a framework to evaluate future potential service and fare changes. No fare changes are proposed at this time.

5. **Comment:** The District's Allocation of resources between bus and ferry services needs to be re-evaluated in view of Title VI. There is a disproportionate amount of resources going to wealthy ferry riders and not to low-income bus riders.

Response: Duly noted. The proposed policies do not address specific to the District's allocation of transit resources between modes. The District plans to analyze the demographic characteristics of its ferry and regional bus riderships.

6. **Comment:** The job of the Golden Gate Transit District is to provide public transportation, in order to reduce automobile traffic and provide a reasonable-cost alternative to driving. The job of the District is transportation, NOT social justice, affirmative action or welfare. All this would do is raise the cost of transportation due to the additional resources needed to determine, implement and monitor these Title VI items. It is ridiculous to put the Transit District into this situation. The \$5,000 to conduct this initial public hearing will be pocket change to the cost of implementation. The bottom line is stick to your primary objective and tell the feds to make their own determinations that the Transit District is discriminatory, and make them prove it. Focus on serving the communities you service, while keeping costs down, and not on Washington D.C's social justice schemes.

Response: The proposed policies and overall compliance with Title VI is a condition of the District continuing to receive federal financial assistance for its public transportation programs.

7. **Comment:** I oppose any fare increases for the Golden Gate transit ferries, buses and bridge. The fares are exorbitant as they are now and are a huge burden on the average person's finances. This is supposed to be PUBLIC transportation, not ELITE transportation. It is only affordable to the rich.

Response: The proposed policies are not specific to any fare increase at this time. They will be used to evaluate future fare increase proposals.

EXHIBIT B

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Impact table for Bus Fares Means-Based Fare Program

							Usage by Group (number)					Usage by Group (percent)					Cumulative Current fare				Cumulative Proposed Fare				Fare Change Experienced by Group				
Zone to Zone	Payment Method	Pax Category	Cost Existing 7/19	Proposed 1/20	Change Absolute	Percent	Low Income	Non-Low Income	Minority	Non Nminority	Overall	Low Income	Non-Low Income	Minority	Non-Minority	Overall	Low Income	Non-Low Income	Minority	Non Minority	Low Income	Non-Low Income	Minority	Non Minority	Low Income	Non-Low Income	Minority	Non Minority	
Zone 1 to Zone 1	Cash	Adult	\$4.50	\$4.50	\$0.00	0.00%	10.00	8.00	10.00	14.00	18.00	1.8%	0.8%	1.7%	1.3%	1.2%	\$45.00	\$36.00	\$45.00	\$63.00	\$45.00	\$36.00	\$45.00	\$63.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$2.25	\$2.25	\$0.00	0.00%	0.00	2.00	3.00	0.00	2.00	0.0%	0.2%	0.5%	0.0%	0.1%	\$0.00	\$4.50	\$6.75	\$0.00	\$0.00	\$4.50	\$6.75	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	Clipper	Adult	\$3.60	\$3.60	\$0.00	0.00%	0.00	26.00	15.00	23.00	26.00	0.0%	2.6%	2.6%	2.2%	1.7%	\$0.00	\$93.60	\$54.00	\$82.80	\$0.00	\$93.60	\$54.00	\$82.80	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$3.60	\$2.25	-\$1.35	-37.50%	6.00	0.00	2.00	4.00	6.00	1.1%	0.0%	0.3%	0.4%	0.4%	\$21.60	\$0.00	\$7.20	\$14.40	\$13.50	\$0.00	\$4.50	\$9.00	-\$8.10	\$0.00	-\$2.70	-\$5.40	
Zone 1 AND Zone 2	Cash	Adult	\$7.00	\$7.00	\$0.00	0.00%	17.00	33.00	25.00	30.00	50.00	3.0%	3.3%	4.4%	2.8%	3.2%	\$119.00	\$231.00	\$175.00	\$210.00	\$119.00	\$231.00	\$175.00	\$210.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$3.50	\$3.50	\$0.00	0.00%	7.00	15.00	5.00	27.00	22.00	1.2%	1.5%	0.9%	2.5%	1.4%	\$24.50	\$52.50	\$17.50	\$94.50	\$24.50	\$52.50	\$17.50	\$94.50	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Adult	\$5.60	\$5.60	\$0.00	0.00%	0.00	194.00	73.00	174.00	194.00	0.0%	19.6%	12.7%	16.4%	12.5%	\$0.00	\$1,086.40	\$408.80	\$974.40	\$0.00	\$1,086.40	\$408.80	\$974.40	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$5.60	\$3.50	-\$2.10	-37.50%	52.00	0.00	15.00	37.00	52.00	9.1%	0.0%	2.6%	3.5%	3.3%	\$291.20	\$0.00	\$84.00	\$207.20	\$182.00	\$0.00	\$52.50	\$129.50	-\$109.20	\$0.00	-\$31.50	-\$77.70	
Zone 1 AND Zone 3	Cash	Adult	\$7.50	\$7.50	\$0.00	0.00%	24.00	38.00	30.00	36.00	62.00	4.2%	3.8%	5.2%	3.4%	4.0%	\$180.00	\$285.00	\$225.00	\$270.00	\$180.00	\$285.00	\$225.00	\$270.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$3.75	\$3.75	\$0.00	0.00%	14.00	9.00	10.00	31.00	23.00	2.5%	0.9%	1.7%	2.9%	1.5%	\$52.50	\$33.75	\$37.50	\$116.25	\$52.50	\$33.75	\$37.50	\$116.25	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Adult	\$6.00	\$6.00	\$0.00	0.00%	0.00	205.00	105.00	167.00	205.00	0.0%	20.8%	18.3%	15.8%	13.2%	\$0.00	\$1,230.00	\$630.00	\$1,002.00	\$0.00	\$1,230.00	\$630.00	\$1,002.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$6.00	\$3.75	-\$2.25	-37.50%	79.00	0.00	31.00	48.00	79.00	13.9%	0.0%	5.4%	4.5%	5.1%	\$474.00	\$0.00	\$186.00	\$288.00	\$296.25	\$0.00	\$116.25	\$180.00	-\$177.75	\$0.00	-\$69.75	-\$108.00	
Zone 1 AND Zone 4	Cash	Adult	\$8.75	\$8.75	\$0.00	0.00%	12.00	12.00	13.00	12.00	24.00	2.1%	1.2%	2.3%	1.1%	1.5%	\$105.00	\$105.00	\$113.75	\$105.00	\$105.00	\$105.00	\$113.75	\$105.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$4.25	\$4.25	\$0.00	0.00%	1.00	2.00	3.00	2.00	3.00	0.2%	0.2%	0.5%	0.2%	0.2%	\$4.25	\$8.50	\$12.75	\$8.50	\$4.25	\$8.50	\$12.75	\$8.50	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Adult	\$7.00	\$7.00	\$0.00	0.00%	0.00	128.00	37.00	103.00	128.00	0.0%	13.0%	6.5%	9.7%	8.2%	\$0.00	\$896.00	\$259.00	\$721.00	\$0.00	\$896.00	\$259.00	\$721.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$7.00	\$4.25	-\$2.75	-39.29%	32.00	0.00	9.00	23.00	32.00	5.6%	0.0%	1.6%	2.2%	2.1%	\$224.00	\$0.00	\$63.00	\$161.00	\$136.00	\$0.00	\$38.25	\$97.75	-\$88.00	\$0.00	-\$24.75	-\$63.25	
Zone 1 AND Zone 5	Cash	Adult	\$13.00	\$13.00	\$0.00	0.00%	10.00	12.00	14.00	9.00	22.00	1.8%	1.2%	2.4%	0.8%	1.4%	\$130.00	\$156.00	\$182.00	\$117.00	\$130.00	\$156.00	\$182.00	\$117.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$6.50	\$6.50	\$0.00	0.00%	1.00	1.00	1.00	4.00	2.00	0.2%	0.1%	0.2%	0.4%	0.1%	\$6.50	\$6.50	\$6.50	\$26.00	\$6.50	\$6.50	\$6.50	\$26.00	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Adult	\$10.40	\$10.40	\$0.00	0.00%	0.00	109.00	35.00	95.00	109.00	0.0%	11.0%	6.1%	9.0%	7.0%	\$0.00	\$1,133.60	\$364.00	\$988.00	\$0.00	\$1,133.60	\$364.00	\$988.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$10.40	\$6.50	-\$3.90	-37.50%	26.00	0.00	7.00	19.00	26.00	4.6%	0.0%	1.2%	1.8%	1.7%	\$270.40	\$0.00	\$72.80	\$197.60	\$169.00	\$0.00	\$45.50	\$123.50	-\$101.40	\$0.00	-\$27.30	-\$74.10	
Zone 1 AND Zone 6	Cash	Adult	\$13.00	\$13.00	\$0.00	0.00%	27.72	10.15	21.00	15.00	37.87	4.9%	1.0%	3.7%	1.4%	2.4%	\$360.36	\$131.92	\$273.00	\$195.00	\$360.36	\$131.92	\$273.00	\$195.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$6.50	\$6.50	\$0.00	0.00%	11.11	14.41	4.00	3.00	25.52	1.9%	1.5%	0.7%	0.3%	1.6%	\$72.24	\$93.66	\$26.00	\$19.50	\$72.24	\$93.66	\$26.00	\$19.50	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Other					0.00	0.00	1.00	0.00	0.00	0.0%	0.0%	0.2%	0.0%	0.0%													
		Adult	\$10.40	\$10.40	\$0.00	0.00%	0.00	67.17	25.00	47.00	67.17	0.0%	6.8%	4.4%	4.4%	4.3%	\$0.00	\$698.55	\$260.00	\$488.80	\$0.00	\$698.55	\$260.00	\$488.80	\$0.00	\$0.00	\$0.00	\$0.00	
Zone 1 AND Zone 7	Cash	Means	\$10.40	\$6.50	-\$3.90	-37.50%	17.97	0.00	6.00	12.00	17.97	3.2%	0.0%	1.0%	1.1%	1.2%	\$186.85	\$0.00	\$62.40	\$124.80	\$116.78	\$0.00	\$39.00	\$78.00	-\$70.07	\$0.00	-\$23.40	-\$46.80	
		Adult	\$11.75	\$11.75	\$0.00	0.00%	3.29	2.20	0.00	0.00	5.49	0.6%	0.2%	0.0%	0.0%	0.4%	\$38.71	\$25.81	\$0.00	\$0.00	\$38.71	\$25.81	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Discount*	\$5.75	\$5.75	\$0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%													
Zone 2,3,4 AND Zone 2,3,4	Cash	Adult	\$3.50	\$3.50	\$0.00	0.00%	0.00	0.61	0.00	0.00	0.61	0.0%	0.1%	0.0%	0.0%	0.0%	\$0.00	\$2.15	\$0.00	\$0.00	\$0.00	\$2.15	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$3.50	\$3.50	\$0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
	Clipper	Adult	\$7.00	\$7.00	\$0.00	0.00%	0.00	128.00	37.00	103.00	128.00	0.0%	13.0%	6.5%	9.7%	8.2%	\$0.00	\$896.00	\$259.00	\$721.00	\$0.00	\$896.00	\$259.00	\$721.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$7.00	\$4.25	-\$2.75	-39.29%	32.00	0.00	9.00	23.00	32.00	5.6%	0.0%	1.6%	2.2%	2.1%	\$224.00	\$0.00	\$63.00	\$161.00	\$136.00	\$0.00	\$38.25	\$97.75	-\$88.00	\$0.00	-\$24.75	-\$63.25	
Zone 2 AND Zone 5	Cash	Adult	\$9.50	\$9.50	\$0.00	0.00%	0.61	0.61	0.00	0.00	1.23	0.1%	0.1%	0.0%	0.0%	0.1%	\$5.84	\$5.84	\$0.00	\$0.00	\$5.84	\$5.84	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$4.75	\$4.75	\$0.00																								

Zone 3 AND Zone 7	Cash	Adult	\$6.25	\$6.25	\$0.00	0.00%	60.40	13.44	8.00	9.00	73.84	10.6%	1.4%	1.4%	0.8%	4.7%	\$377.51	\$84.01	\$50.00	\$56.25	\$377.51	\$84.01	\$50.00	\$56.25	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$3.00	\$3.00	\$0.00	0.00%	34.35	12.12	0.00	2.00	46.48	6.0%	1.2%	0.0%	0.2%	3.0%	\$103.06	\$36.37	\$0.00	\$6.00	\$103.06	\$36.37	\$0.00	\$6.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	1.00	0.00	0.00	0.0%	0.0%	0.2%	0.0%	0.0%												
	Clipper	Adult	\$5.00	\$5.00	\$0.00	0.00%	0.00	31.76	25.00	54.00	31.76	0.0%	3.2%	4.4%	5.1%	2.0%	\$0.00	\$158.80	\$125.00	\$270.00	\$0.00	\$158.80	\$125.00	\$270.00	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$5.00	\$3.00	-\$2.00	-40.00%	37.52	0.00	12.00	26.00	37.52	6.6%	0.0%	2.1%	2.5%	2.4%	\$187.58	\$0.00	\$60.00	\$130.00	\$112.55	\$0.00	\$36.00	\$78.00	-\$75.03	\$0.00	-\$24.00	-\$52.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 4 AND Zone 5	Cash	Adult	\$7.00	\$7.00	\$0.00	0.00%	3.43	0.00	2.00	1.00	3.43	0.6%	0.0%	0.3%	0.1%	0.2%	\$23.98	\$0.00	\$14.00	\$7.00	\$23.98	\$0.00	\$14.00	\$7.00	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$3.50	\$3.50	\$0.00	0.00%	1.71	1.10	1.00	0.00	2.81	0.3%	0.1%	0.2%	0.0%	0.2%	\$6.00	\$3.84	\$3.50	\$0.00	\$6.00	\$3.84	\$3.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$5.60	\$5.60	\$0.00	0.00%	0.00	0.61	0.00	1.00	0.61	0.0%	0.1%	0.0%	0.1%	0.0%	\$0.00	\$3.44	\$0.00	\$5.60	\$0.00	\$3.44	\$0.00	\$5.60	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$5.60	\$3.50	-\$2.10	-37.50%	2.20	0.00	0.00	2.00	2.20	0.4%	0.0%	0.0%	0.2%	0.1%	\$12.30	\$0.00	\$0.00	\$11.20	\$7.69	\$0.00	\$0.00	\$7.00	-\$4.61	\$0.00	\$0.00	-\$4.20
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 4 AND Zone 6	Cash	Adult	\$7.00	\$7.00	\$0.00	0.00%	1.10	1.10	2.00	0.00	2.20	0.2%	0.1%	0.3%	0.0%	0.1%	\$7.69	\$7.69	\$14.00	\$0.00	\$7.69	\$7.69	\$14.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$3.50	\$3.50	\$0.00	0.00%	0.61	1.10	1.00	2.00	1.71	0.1%	0.1%	0.2%	0.2%	0.1%	\$2.15	\$3.84	\$3.50	\$7.00	\$2.15	\$3.84	\$3.50	\$7.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$5.60	\$5.60	\$0.00	0.00%	0.00	1.10	1.00	2.00	1.10	0.0%	0.1%	0.2%	0.2%	0.1%	\$0.00	\$6.15	\$5.60	\$11.20	\$0.00	\$6.15	\$5.60	\$11.20	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$5.60	\$3.50	-\$2.10	-37.50%	4.52	0.00	1.00	3.00	4.52	0.8%	0.0%	0.2%	0.3%	0.3%	\$25.34	\$0.00	\$5.60	\$16.80	\$15.84	\$0.00	\$3.50	\$10.50	-\$9.50	\$0.00	-\$2.10	-\$6.30
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 4 AND Zone 7	Cash	Adult	\$6.25	\$6.25	\$0.00	0.00%	4.04	4.39	0.00	0.00	8.43	0.7%	0.4%	0.0%	0.0%	0.5%	\$25.26	\$27.46	\$0.00	\$0.00	\$25.26	\$27.46	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$3.00	\$3.00	\$0.00	0.00%	3.29	1.71	0.00	0.00	5.01	0.6%	0.2%	0.0%	0.0%	0.3%	\$9.88	\$5.14	\$0.00	\$0.00	\$9.88	\$5.14	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$5.00	\$5.00	\$0.00	0.00%	0.00	4.39	0.00	0.00	4.39	0.0%	0.4%	0.0%	0.0%	0.3%	\$0.00	\$21.97	\$0.00	\$0.00	\$0.00	\$21.97	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$5.00	\$3.00	-\$2.00	-40.00%	3.91	0.00	0.00	0.00	3.91	0.7%	0.0%	0.0%	0.0%	0.3%	\$19.55	\$0.00	\$0.00	\$0.00	\$11.73	\$0.00	\$0.00	\$0.00	-\$7.82	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 5 AND Zone 5	Cash	Adult	\$4.50	\$4.50	\$0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$2.25	\$2.25	\$0.00	0.00%	0.00	1.10	0.00	0.00	1.10	0.0%	0.1%	0.0%	0.0%	0.1%	\$0.00	\$2.47	\$0.00	\$0.00	\$0.00	\$2.47	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$3.60	\$3.60	\$0.00	0.00%	0.00	1.10	1.00	1.00	1.10	0.0%	0.1%	0.2%	0.1%	0.1%	\$0.00	\$3.95	\$3.60	\$3.60	\$0.00	\$3.95	\$3.60	\$3.60	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$3.60	\$2.25	-\$1.35	-37.50%	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 5 AND Zone 6	Cash	Adult	\$4.50	\$4.50	\$0.00	0.00%	5.89	4.04	2.00	3.00	9.93	1.0%	0.4%	0.3%	0.3%	0.6%	\$26.49	\$18.19	\$9.00	\$13.50	\$26.49	\$18.19	\$9.00	\$13.50	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$2.25	\$2.25	\$0.00	0.00%	4.04	0.00	0.00	0.00	4.04	0.7%	0.0%	0.0%	0.0%	0.3%	\$9.09	\$0.00	\$0.00	\$0.00	\$9.09	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$3.60	\$3.60	\$0.00	0.00%	0.00	2.20	2.00	3.00	2.20	0.0%	0.2%	0.3%	0.3%	0.1%	\$0.00	\$7.91	\$7.20	\$10.80	\$0.00	\$7.91	\$7.20	\$10.80	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$3.60	\$2.25	-\$1.35	-37.50%	1.71	0.00	1.00	1.00	1.71	0.3%	0.0%	0.2%	0.1%	0.1%	\$6.17	\$0.00	\$3.60	\$3.60	\$3.85	\$0.00	\$2.25	\$2.25	-\$2.31	\$0.00	-\$1.35	-\$1.35
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 5 AND Zone 7	Cash	Adult	\$11.75	\$11.75	\$0.00	0.00%	1.71	0.00	0.00	0.00	1.71	0.3%	0.0%	0.0%	0.0%	0.1%	\$20.13	\$0.00	\$0.00	\$0.00	\$20.13	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$5.75	\$5.75	\$0.00	0.00%	2.33	0.00	0.00	0.00	2.33	0.4%	0.0%	0.0%	0.0%	0.1%	\$13.39	\$0.00	\$0.00	\$0.00	\$13.39	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$9.40	\$9.40	\$0.00	0.00%	0.00	1.10	0.00	0.00	1.10	0.0%	0.1%	0.0%	0.0%	0.1%	\$0.00	\$10.32	\$0.00	\$0.00	\$0.00	\$0.00	\$10.32	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Means	\$9.40	\$5.75	-\$3.65	-38.83%	1.10	0.00	0.00	0.00	1.10	0.2%	0.0%	0.0%	0.0%	0.1%	\$10.32	\$0.00	\$0.00	\$0.00	\$6.32	\$0.00	\$0.00	\$0.00	-\$4.01	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 6 AND Zone 6	Cash	Adult	\$4.50	\$4.50	\$0.00	0.00%	0.00	0.61	1.00	0.00	0.61	0.0%	0.1%	0.2%	0.0%	0.0%	\$0.00	\$2.77	\$4.50	\$0.00	\$0.00	\$2.77	\$4.50	\$0.00	\$0.00	\$0.00	\$0.00	
		Discount*	\$2.25	\$2.25	\$0.00	0.00%	1.10	0.00	0.00	0.00	1.10	0.2%	0.0%	0.0%	0.0%	0.1%	\$2.47	\$0.00	\$0.00	\$0.00	\$2.47	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$3.60	\$3.60	\$0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Means	\$3.60	\$2.25	-\$1.35	-37.50%	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
Zone 6 AND Zone 7	Cash	Adult	\$11.75	\$11.75	\$0.00	0.00%	1.71	0.00	0.00	0.00	1.71	0.3%	0.0%	0.0%	0.0%	0.1%	\$20.13	\$0.00	\$0.00	\$0.00	\$20.13	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Discount*	\$5.75	\$5.75	\$0.00	0.00%	0.61	0.00	0.00	0.00	0.61	0.1%	0.0%	0.0%	0.0%	0.0%	\$3.54	\$0.00	\$0.00	\$0.00	\$3.54	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Other					0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%												
	Clipper	Adult	\$9.40	\$9.40	\$0.00	0.00%	0.00																					

Impact table for Ferry Fares Means-Based Fare Program

							Usage by Group (number)					Usage by Group (percent)					Cumulative Current fare				Cumulative Proposed Fare				Fare Change Experienced by Group							
Payment		Pax	Cost		Proposed	Change	Low	Non-Low	Non			Low	Non-Low	Non			Low	Non-Low	Non			Low	Non-Low	Non			Low	Non-Low	Non			
Zone to Zone	Method	Category	Existing 7/19	1/20	Absolute	Percent	Income	Income	Minority	Minority	Overall	Income	Income	Minority	Minority	Overall	Income	Income	Minority	Minority		Income	Income	Minority	Minority		Income	Income	Minority	Minority		
Sausalito Ferry	Cash	Adult	\$13.00	\$13.00	\$0.00	0.00%	36.69	70.40	27.84	75.60	107.1	6.73%	4.05%	7.31%	4.23%	4.69%	\$477.02	\$915.23	\$361.91	\$982.78		\$477.02	\$915.23	\$361.91	\$982.78		\$0.00	\$0.00	\$0.00	\$0.00		
		Discount*	\$6.50	\$6.50	\$0.00	0.00%	22.89	58.36	10.38	68.73	81.2	4.20%	3.35%	2.73%	3.85%	3.56%	\$148.80	\$379.32	\$67.45	\$446.77		\$148.80	\$379.32	\$67.45	\$446.77		\$0.00	\$0.00	\$0.00	\$0.00		
		Other					0.00	1.07	0.00	1.07	1.1	0.00%	0.06%	0.00%	0.06%	0.05%																
	Clipper	Adult	\$7.00	\$7.00	\$0.00	0.00%	0.00	340.93	59.94	268.41	340.9	0.00%	19.59%	15.75%	15.03%	14.92%	\$0.00	\$2,386.52	\$419.58	\$1,878.87		\$0.00	\$2,386.52	\$419.58	\$1,878.87		\$0.00	\$0.00	\$0.00	\$0.00		
		Means	\$7.00	\$6.50	-\$0.50	-7.14%	101.59	0.00	18.54	83.05	101.6	18.64%	0.00%	4.87%	4.65%	4.45%	\$711.13	\$0.00	\$129.81	\$581.32		\$660.34	\$0.00	\$120.54	\$539.80		-\$50.80	\$0.00	-\$9.27	-\$41.52		
	Other	Adult					3.66	6.94	1.45	9.15	10.6	0.67%	0.40%	0.38%	0.51%	0.46%																
		Discount					0.38	1.07	0.38	1.07	1.4	0.07%	0.06%	0.10%	0.06%	0.06%																
		Other					0.00	0.00	0.00	0.00	0.0	0.00%	0.00%	0.00%	0.00%	0.00%																
	Larkspur Ferry	Cash	Adult	\$12.50	\$12.50	\$0.00	0.00%	24.53	35.40	12.93	46.32	59.9	4.50%	2.03%	3.40%	2.59%	2.62%	\$306.64	\$442.50	\$161.65	\$579.02		\$306.64	\$442.50	\$161.65	\$579.02		\$0.00	\$0.00	\$0.00	\$0.00	
Discount*			\$6.25	\$6.25	\$0.00	0.00%	61.28	92.67	27.91	119.91	153.9	11.24%	5.33%	7.33%	6.72%	6.74%	\$382.97	\$579.16	\$174.42	\$749.41		\$382.97	\$579.16	\$174.42	\$749.41		\$0.00	\$0.00	\$0.00	\$0.00		
Other							0.00	0.00		0.00	0.0	0.00%	0.00%	0.00%	0.00%	0.00%																
Clipper		Adult	\$8.00	\$8.00	\$0.00	0.00%	0.00	914.54	138.81	731.39	914.5	0.00%	52.56%	36.47%	40.96%	40.02%	\$0.00	\$7,316.31	\$1,110.48	\$5,851.12		\$0.00	\$7,316.31	\$1,110.48	\$5,851.12		\$0.00	\$0.00	\$0.00	\$0.00		
		Means	\$8.00	\$6.25	-\$1.75	-21.88%	215.24	0.00	34.33	180.91	215.2	39.48%	0.00%	9.02%	10.13%	9.42%	\$1,721.92	\$0.00	\$274.66	\$1,447.26		\$1,345.25	\$0.00	\$214.58	\$1,130.67		-\$376.67	\$0.00	-\$60.08	-\$316.59		
Other		Adult					5.42	13.60	4.75	13.59	19.0	0.99%	0.78%	1.25%	0.76%	0.83%																
		Discount					3.41	2.73	1.37	4.77	6.1	0.63%	0.16%	0.36%	0.27%	0.27%																
		Other					0.68	1.37		3.39	2.0	0.12%	0.08%	0.00%	0.19%	0.09%																
Tiburon Ferry	Cash	Adult	\$13.00	\$13.00	\$0.00	0.00%	15.41	29.57	11.69	31.75	45.0	2.83%	1.70%	3.07%	1.78%	1.97%	\$200.35	\$384.40	\$152.00	\$412.77		\$200.35	\$384.40	\$152.00	\$412.77		\$0.00	\$0.00	\$0.00	\$0.00		
		Discount*	\$6.50	\$6.50	\$0.00	0.00%	9.61	24.51	4.36	28.87	34.1	1.76%	1.41%	1.15%	1.62%	1.49%	\$62.49	\$159.31	\$28.33	\$187.64		\$62.49	\$159.31	\$28.33	\$187.64		\$0.00	\$0.00	\$0.00	\$0.00		
		Other					0.00	0.45	0.00	0.45	0.4	0.00%	0.03%	0.00%	0.03%	0.02%																
	Clipper	Adult	\$7.00	\$7.00	\$0.00	0.00%	0.00	143.19	17.38	77.85	143.2	0.00%	8.23%	4.57%	4.36%	6.27%	\$0.00	\$1,002.34	\$121.66	\$544.95		\$0.00	\$1,002.34	\$121.66	\$544.95		\$0.00	\$0.00	\$0.00	\$0.00		
		Means	\$7.00	\$6.50	-\$0.50	-7.14%	42.67	0.00	7.79	34.88	42.7	7.83%	0.00%	2.05%	1.95%	1.87%	\$298.67	\$0.00	\$54.52	\$244.15		\$277.34	\$0.00	\$50.63	\$226.71		-\$21.33	\$0.00	-\$3.89	-\$17.44		
	Other	Adult					1.54	2.91	0.61	3.84	4.5	0.28%	0.17%	0.16%	0.22%	0.19%																
		Discount					0.16	0.45	0.16	0.45	0.6	0.03%	0.03%	0.04%	0.03%	0.03%																
		Other					0.00	0.00	0.00	0.00	0.0	0.00%	0.00%	0.00%	0.00%	0.00%																
	TOTALS							545.2	1740.1	380.6	1785.4	2285.3	100.00%	100.00%	100.00%	100.00%	100.00%															
																	Total Cumulative Current Fare				\$4,310.01	\$13,565.09	\$3,056.48	\$13,906.06								
																	Average Cumulative Current Fare				\$7.91	\$7.80	\$8.03	\$7.79								
*Discount includes Senior, Youth, and Disabled fares paid both in cash and by Clipper																	Total Cumulative Proposed Fare				\$3,861.21	\$13,565.09	\$2,983.23	\$13,530.51								
"Other" is generally a non-cash fare such as a transfer or an emoloyee's free ride																	Average Cumulative Proposed Fare				\$7.08	\$7.80	\$7.84	\$7.58								
																	Total Change in Fare per Group					-\$448.80	\$0.00	-\$73.25		-\$375.55						
																	Average Change in Fare per Group					-\$0.82	\$0.00	-\$0.19		-\$0.21						
																	Percent Change in Fare per Group					100.00%	0.00%	16.32%		83.68%						
																	Percentage Ridership of each Group (Based on all 2018 Survey Respondents)					23.85%	76.15%	17.57%		82.43%						
																	Difference from Exact Proportional Impact of Fare Change					76.15%	-76.15%	-1.25%		1.25%						
																						Findings	no disproportionate		no disparate							

***Threshold for Disparate Impact and Disproportionate burden is 10%**

The positive impact on low-income riders is 76.15% higher than on riders in general. The positive impact on minority riders is 1.25% lower than on riders in general

Agenda Item No. (6)

To: Finance-Auditing Committee/Committee of the Whole
Meeting of October 22, 2020

From: Ron Downing, Director of Planning
Joseph M. Wire, Auditor-Controller
Denis J. Mulligan, General Manager

Subject: **APPROVE ACTIONS RELATIVE TO ADOPTION OF A CLIPPER START
FARE FOR MARIN LOCAL RIDES ON GOLDEN GATE TRANSIT BUS
SERVICE, APPROVAL OF THE ASSOCIATED TITLE VI EQUITY
ANALYSIS, AND AMEND THE MASTER ORDINANCE**

Recommendation

The Finance-Auditing Committee recommends that the Board of Directors approve actions relative to adoption of an expansion of the means-based fares, known as “Clipper START” fares, to include local rides within Marin County on Golden Gate Transit buses as follows:

1. Adopt a Clipper START fare for local rides within Marin County on Golden Gate Transit buses;
2. Approve the associated Title VI Equity Analysis; and,
3. Amend the Master Ordinance accordingly.

This matter will be presented to the Board of Directors at its meeting on October 23, 2020, for appropriate action.

Summary

The Metropolitan Transportation Commission (MTC) on May 23, 2018 approved implementation of a pilot program lasting 12 to 18 months, to provide means-based fares for low-income persons on participating transit systems. Persons with incomes below 200% of the Federal Poverty Level (approximately \$75,000 per year for a family of four in the Bay Area) would be eligible to enroll in the program. The program would issue special Clipper cards to qualifying persons that provide discounts of 20% or 50% off current adult cash fares.

The Board voted on September 27, 2019 to participate in the means-based fare program with a 50% discount for primarily regional trips on Golden Gate Transit buses and regular (non-special event) Golden Gate Ferry service. The program, which was subsequently branded “Clipper START,” began on July 15, 2020. The Golden Gate Bridge, Highway and Transportation District (District), BART, Caltrain, and SFMTA are the initial participants in the program.

Several additional Bay Area transit agencies expressed an interest in implementing means-based fares subsequent to the initial MTC action, and earlier this year MTC offered to expand Clipper START to those agencies. As part of this expansion, Marin Transit will join the program starting in November 2020 and offer a 50% discount off the current adult cash fare for travel within Marin County.

The District charges fares set by Marin Transit for local travel within Marin County on Golden Gate Transit buses pursuant to the contract and the historical relationship between the two agencies. Therefore, in order to continue providing a seamless experience for eligible passengers who use Marin Transit and Golden Gate Transit interchangeably for local travel within Marin County, the District would need to match Marin Transit's Clipper START fare. However, the Clipper START fares for Golden Gate Transit bus service authorized by the Board in September 2019 exclude local travel in Marin County, so further Board action is required.

The current adult fare for local travel within Marin County for both Golden Gate Transit and Marin Transit is \$2.00 for cash and \$1.80 for Clipper. Clipper START would provide a 50% discount based on the cash fare to eligible participants, so the fare would be \$1.00 for local rides. If adopted, the Master Ordinance would be amended to reflect the new Clipper START fare through June 30, 2021. Should the means-based fare program continue beyond June 30, 2021, which is when the current Board-adopted Five-Year Fare Program ends, Clipper START fares would be included in the fare tables adopted as part of future fare programs.

Public Involvement Process and Comments Received

Public Notification

Outreach on the proposal to create a Clipper START fare for Marin local rides began on August 28, 2020, when the Board approved holding a public hearing on September 24, 2020. The public comment period closed at 4:30 p.m. on Friday, September 25, 2020.

Public notification activities included:

- Displays posted on board buses;
- Advertisements in local publications (*Marin Independent Journal* and *La Voz*);
- Press releases to local media;
- Social media postings on Facebook and Twitter; and,
- Email blast to customers and community-based organizations.

Translation of all printed materials and handouts in Spanish were available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on the proposal to create a Clipper START fare for Marin local rides could be submitted in several different ways:

1. Attend the public hearing;
2. Email publichearing@goldengate.org; and/or,
3. Send written comments to the District Secretary.

The District's practice is to treat all comments equally without regard to the manner in which they are submitted or received. Therefore, individuals did not have to attend the public hearing to provide testimony if they commented through email or written forms. All comments received through the above methods were considered in the final recommendation so long as they were received by 4:30 p.m. on Friday September 25, 2020.

Comments Received

Nine (9) comments were received regarding the proposal to create a Clipper START fare for Marin local rides. Eight (8) comments supported this proposal, and one (1) comment was unrelated to the proposal.

Title VI Equity Analysis

A Title VI Equity Analysis is required to accompany the final recommendation to the Board, which is expected to occur on October 23, 2020, because this proposal creates a new fare. This analysis was completed after the public hearing in order to reflect any comments received on the proposal.

In accordance with the Federal Transit Administration regulations and guidance implementing Title VI of the Civil Rights Act of 1964, as well as the District's Title VI Policies, staff conducted a Title VI Equity Analysis to determine whether the proposed Clipper START fare would result in a disparate impact to minority populations or impose a disproportionate burden on low-income populations in the District's service area.

The analysis concluded that all of the benefits of the means-based fare program would accrue to low-income riders, so creating the new fare would not have a disproportionate burden on low income riders. Although many minority riders would benefit from the program, 5.74% more of the beneficiaries of the program would be non-minority riders. As the 5.74% discrepancy is within the District's 10% disparate impact threshold, the proposal to create a new Clipper START fare would also not result in a disparate impact on minority riders. Additionally, there are several substantial justifications for this action. Alignment of fares in Marin County between Marin Transit and GGT is necessary to maintain consistency between these two services, and participation in the Clipper START program increases transit access for low-income persons, many of whom have limited mobility options.

The detailed Title VI Equity Analysis of the proposed Clipper START fare for Marin local rides is included in Appendix A.

Fiscal Impact

The cost to expand Clipper START to include a Marin local fare on Golden Gate Transit bus service is dependent upon the participation rate of qualified persons. It is estimated that the annual cost of the proposed expansion would be between \$15,000 and \$44,000. The estimated annual cost

of the overall Clipper START program would be between \$230,000 and \$460,000. Regional funding between \$300,000 and \$500,000 is expected to be available to offset the lost revenue. By agreement between MTC and the region's operators, regional funding will offset up to half of a 20% fare discount. Since GGB is offering a 50% fare discount, regional funding will offset up to 10% of that 50% discount, or up to 20% of GGB's total revenue loss. The Board previously authorized the Clipper START program with an anticipated annual cost between \$500,000 and \$1,000,000 across the District's bus and ferry services. In sum, this action does not increase the cost of the Clipper START program beyond the amount previously authorized by the Board.

Attachments: Appendix A, Title VI Equity Analysis
Exhibit A, RESOLUTION NO. 2013-078
Exhibit B, GGT Disparate Impact-Disproportionate Burden Table- Marin Local Means-Based Fare

APPENDIX A
Title VI Equity Analysis: Clipper Start Marin local Fares
Presented to the Golden Gate Bridge, Highway and Transportation District
Finance-Auditing Committee
October 22, 2020

Staff proposes to implement a means-based fare reduction for Golden Gate Transit (GGT) trips within Marin County as part of the Regional Means-Based Fare Program being administered by the Metropolitan Transportation Commission (MTC), now known as Clipper START. This action constitutes the establishment of a new fare product.

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin by recipients of federal financial assistance. Before the Golden Gate Bridge, Highway and Transportation District's (District) Board of Directors (Board) can adopt the proposed fare change, the Board must consider whether the proposed change will disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area. The required components of this Title VI Equity Analysis are set forth in the Federal Transit Administration's regulations and FTA Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients") implementing Title VI of the Civil Rights Act of 1964, and in the District's Title VI Policies.

This analysis indicates that implementation of the proposed fare product does not have a disparate impact on minority GGT riders or a disproportionate burden on low-income GGT riders.

I. Background

On May 23, 2018, the Metropolitan Transportation Commission (MTC) approved implementation of a pilot Regional Means-Based Fare Program as a way to provide greater mobility options for low-income persons on participating transit systems in the Bay Area. Persons with income below 200% of the Federal Poverty Level (approximately \$70,000 per year for a family of four in the Bay Area) would be eligible. MTC has funded the program for 12 to 18 months, depending on how quickly the available funds (which partially offset the cost of the program) are expended.

MTC requires each agency participating in the program to provide governing board approval. The District's Board approved a resolution of support of participating in the program on July 27, 2018.

On September 27, 2019, the Board of Directors approved the District's adoption of Clipper START, which was launched July 2020 for GGT regional bus trips and Golden Gate Ferry (GGF), along with BART, Caltrain, and SFMTA. Clipper START fares are only available through the use of a Clipper® card. The Clipper START program established a fifty percent reduction from regular cash fares for low income persons for all GGF trips and regional GGT trips, but not for local travel solely within Marin County. Fares on East Bay service operated by GGT for BART have already been reduced to accommodate BART's "Early Bird Express" service, as have fares for Oracle Park Special Event ferry service and Chase Center ferry service.

On November 1, 2020, Clipper START is expanding to include several additional North Bay transit agencies, including the Marin County Transit District (MT). In order to align GGT's Marin local fares with MT fares, staff proposes to implement a reduced Clipper START fare for Marin local travel on GGT buses effective November 1.

II. Adopted District Title VI Policies

The District adopted its Major Service Change, Disparate Impact and Disproportionate Burden Policies (together referred to as “Title VI Policies”) on August 9, 2013. The latter two policies set forth the standards used in fare equity analyses. The District’s Disparate Impact policy provides:

- The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The District’s Disproportionate Burden Policy provides:

- The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

The public outreach process, comments received and the resolution evidencing the Board’s discussion and approval of the policies is attached as Exhibit A.

III. Golden Gate Transit Bus Services

The fare change proposal concerns GGT services that make stops in Marin County, which are summarized below. GGT has traditionally sought to align its fares with MT for trips within Marin County. Both MT and GGT currently charge an adult Clipper fare of \$1.80. MT is planning to implement a discounted Clipper START fare of \$1.00. The proposed GGT fare change would continue to align GGT with MT for Clipper START trips within Marin County. This fare would be available to low-income passengers with a Clipper START card on all GGT trips that provide service within Marin County.

GGT Bus Services

GGT bus services are generally delineated as “Commute” and “Basic.” Generally, “Commute” bus service is peak-period, one-directional service between Sonoma or Marin County and San Francisco, plus shuttle-type routes designed specifically to take passengers from their places of origin to/from the primary Commute routes. “Basic” bus service, on the other hand, operates seven days a week over most of the day/night to provide basic mobility throughout the District’s service area. More specifically:

- *Transbay Commute Service* provides commute service during morning and afternoon peak-hour periods. Commute routes operate Monday through Friday, except designated

holidays, and serve San Francisco, Marin, and Sonoma counties. Starting in November 2020, commute routes that can potentially carry Marin local passengers include Routes 4, 18, 27, and 54. After December 14, 2020, only Routes 27 and 54 will have that potential, as Routes 4 and 18 will be suspended at that time.

- *Transbay Basic Service* provides daily service throughout the day and evening between San Francisco, Marin, Sonoma, and Contra Costa counties. All Basic routes carry Marin local passengers. Basic routes include Routes 30, 40, 70, and 101. Route 40 service, which operates between Marin and Contra Costa Counties, is supported by Regional Measure 2 (RM2) funds provided by MTC. Route 101 also receives some RM2 funding.

The below tables reflect Clipper START fares system-wide for Fiscal Year 2021 and 2022, including the newly proposed Marin local fare.

<u>BUS FY20-21</u>		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.25	\$3.75	\$3.75	\$4.50	\$6.75	\$6.75	\$3.50
Marin County	2	\$3.75	\$1.00			\$4.50	\$4.75	\$3.25
	3	\$3.75				\$4.25	\$4.50	
	4	\$4.50				\$3.50	\$3.50	
Sonoma County	5	\$6.75	\$4.50	\$4.25	\$3.50	\$2.25		\$6.00
	6	\$6.75	\$4.75	\$4.50	\$3.50			\$6.00
East Bay	7	\$3.50	\$3.25			\$6.00	\$6.00	\$2.00

FERRY FY20-21

Larkspur	\$6.50
Sausalito	\$6.75
Tiburon	\$6.75

<u>BUS FY21-22</u>		San Francisco	Marin County			Sonoma County		East Bay
	Bus Zone	1	2	3	4	5	6	7
San Francisco	1	\$2.50	\$4.00	\$4.00	\$4.50	\$7.00	\$7.00	\$3.50
Marin County	2	\$4.00	\$1.00			\$4.50	\$4.50	\$3.25
	3	\$4.00				\$4.50	\$4.50	
	4	\$4.50				\$3.75	\$3.75	
Sonoma County	5	\$7.00	\$4.50	\$4.50	\$3.75	\$2.50		\$6.25
	6	\$7.00	\$4.50	\$4.50	\$3.75			\$6.25
East Bay	7	\$3.50	\$3.25			\$6.25	\$6.25	\$2.00

FERRY FY21-22

Larkspur	\$6.75
Sausalito	\$7.00
Tiburon	\$7.00

Map 1. Golden Gate Transit and Ferry Service Area

IV. The Proposed Clipper Start Program Outreach

Public Notification

Outreach on the proposal to offer Clipper START fares to Marin local riders began after the Board authorization to hold this public hearing on August 27, 2020, and continued into mid-September prior to the public hearing on September 24, 2020.

Public notification activities included:

- Advertisements in local publications (*Marin Independent Journal* and *La Voz*);
- Posters placed onboard buses;
- Social media postings on Facebook and Twitter;

- Post a news item on the District's website and,
- Email blast to customers.

Translation of all printed materials and handouts in Spanish were made available per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal to establish a Clipper Start fare for Golden Gate Transit Bus Marin local riders could be submitted in several different ways:

1. Attend the public hearing;
2. E-mail publichearing@goldengate.org; and/or,
3. Send written comments to the District Secretary.

The District's practice is to treat all comments equally without regard to the manner in which the comments are submitted or received. Therefore, individuals do not have to attend the public hearing and provide testimony in person if they have commented through e-mail or written forms. All comments received through the above methods will be considered in the final recommendation, provided that they were received by close of business, at 4:30 p.m. on Friday September 25, 2020.

Comments Received

Nine comments were received regarding the proposal to adopt means-based fares. Eight commenters supported the proposal, stating that they were in favor of it because of the benefit that would be made available to low-income riders. One comment was received that was unrelated to the proposal.

V. Title VI Equity Analysis Methodology

Implementation of the Clipper START fare for trips within Marin County constitutes a new fare product under Title VI. Based on FTA Circular 4702.1B, the District must analyze available information generated from ridership surveys that indicates whether minority and low-income passengers are more likely to use the payment types subject to the proposed fare changes. As a result, the District is required to conduct a Title VI Equity Analysis to determine whether the new fare product will result in a disparate impact to minority populations or a disproportionate burden on low-income populations riding locally within Marin County on GGT, based on the District's Title VI Policies.

The FTA Circular states that for fare changes the appropriate comparison for a disproportionate burden analysis is whether low-income riders are disproportionately more likely to use the fare product that would be subject to the change. Similarly, the appropriate comparison for a disparate impact analysis is whether minority riders are disproportionately more likely than non-minority riders to use the fare product that would be subject to the change.

Staff developed and applied the following methodology:

1. Identify Ridership Data Sources

Data: 2018 District System-wide Survey

In 2018, the District participated in the MTC's region-wide survey. The consultant selected by MTC and by District Staff surveyed all of the District's services, including GGT and GGF. Data was collected on board a sample of bus and ferry trips. Questionnaires were in Spanish and English and included questions about the trip being taken and demographics.

2. Analyze the percent change of the proposed fare adjustment for each fare payment method.

As described above, terms of the District's proposed participation in the program would establish a reduction from \$1.80 to \$1.00 for the regular Clipper fares for low income persons applied to GGT Marin local fares. The proposed Clipper START fare would only be available through the use of a Clipper card.

Accordingly, all fare payment media and fare types for Marin local trips on GGT were examined for the level of use by low-income and minority patrons. The media and fare types examined were: Adult Cash fare, Adult Clipper fare, and Senior/Youth/Disabled ("Discount") fare. Clipper Discount fares were not analyzed separately, but were grouped with cash Discount fares, as the Discount fare amounts are the same whether the customer pays with cash or Clipper, and are not subject to further discount with the program. The Clipper START fare was added as a category in order to determine what percentage of patrons of each type (low-income, non-low-income, minority, and non-minority) would benefit from its introduction.

For the most conservative analysis, it was assumed that no cash-paying customers would convert to Clipper usage to take advantage of the discount.

3. Define the term "low-income" as those with an annual household income at or below \$50,000, which is approximately 90% of the median for the service area.

Marin County and Sonoma Counties, which are included in the District's service area, have a comparatively high income (median income was \$97,815 for Marin County and \$60,430 for Sonoma County as of the 2012-2016 American Community Survey). In the District's most recent Title VI Program, District staff used \$54,387 for the annual income cut-off for defining low income for Marin County and Sonoma County. This figure is derived by taking 90% of the median annual income by census tract using the most recent statistics available. For this equity analysis, staff decreased the low-income threshold to \$50,000, which is the closest income strata break in the survey data, and which provides a more protective assessment of disproportionate burden for lower-income earners.

4. **Define the term “minority” to mean those who self-identified as any ethnicity other than “white” alone in the 2018 District System-Wide Survey.**
5. **Determine the usage of each fare product by minority, non-minority, low-income and non-low-income riders.**

This analysis uses low-income passengers as a proxy for potential Clipper START users. As eligibility for Clipper START depends on both income and household size, persons with relatively high incomes can qualify if their household is also large. For example, a user with an eight person household could have a household income of up to \$88,240. However, the 2018 District System-wide Survey did not collect information on household size. The Census indicates that the average persons per household in Marin County is 2.4. \$50,000 is an appropriate proxy because it is the next highest income strata break to the qualifying income for a family of three (\$43,440).

6. **Derive the differential between the usage of the means-based fare for minority riders relative to riders overall, and low-income riders relative to riders overall.**
8. **Compare the differential between minority and riders overall to the disparate impact threshold, and the differential between low-income and riders overall to the disproportionate burden threshold.**

VI. Title VI Equity Analysis Findings

GGT has a complex fare structure with a total of seven zones with varying fares between each zone pair, but this fare change only impacts riders traveling between Zones 2, 3 and 4. These Marin local fares vary based on two characteristics:

1. The fare category (Adult Cash, Adult Clipper, Discount, and Clipper Start fares);
2. The fare media (Cash vs. Clipper).

Adult category passengers receive a discount when using the Clipper card, so Clipper and cash fares are different. As referenced above, because Senior, Youth, and Disabled category riders are already receiving a discount, the Clipper fare for these categories is not discounted further and is the same as the cash fare. Accordingly, the Discount fare group represents those receiving a Senior, Disabled, or Youth discount whether using cash or Clipper.

First, using data from the 2018 District System-Wide Survey, staff compared percentages of minority riders to non-minority riders by fare media and fare payment category. For the 2018 District System-Wide Survey, 176 Marin local bus passengers provided responses to the income question, and 174 Marin local riders provided an answer to the race and ethnicity questions on the survey. As demonstrated in Table 1, 81 out of 174 Marin local GGT riders (46.6%) self-identified as belonging to an ethnic minority, and 93 (53.4%) identified as non-minority. The far right column in Table 2 shows that the most frequently used fare payment type for those riding locally

in Marin on GGT is an adult Clipper fare, used by 39.1% of all customers. As previously discussed, low-income passengers have been assigned to the “Clipper Start Fare” category. Following that are Clipper Start fares, used by 28.2%, and Adult Cash, used by 21.8%, and then Discount fares (Senior, Disabled, and Youth combined), at 10.9%.

Table 1: Bus Fare Product Usage Survey Data—Minority vs. Non-Minority

Payment Type	Minority	Non-Minority	Total
Cash Adult	25	13	38
Discount	8	11	19
Clipper Adult	28	40	68
Clipper START	20	29	49
Total	81	93	174

Table 2: Bus Fare Product Usage by Percentage—Minority vs. Non-Minority

Payment Type	Minority	Non-Minority	Total
Cash Adult	14.4%	7.5%	21.8%
Discount	4.6%	6.3%	10.9%
Clipper Adult	16.1%	23.0%	39.1%
Clipper START	11.5%	16.7%	28.2%
Total	46.6%	53.4%	100%

Applying the same type of analysis to income status as to minority status, Tables 3 and 4 show that of 176 Marin local riders responding to the income question on the survey, 81 or 46% identified themselves as having a household income of \$50,000 or less and are considered low-income. Further, 95 riders (54%) responded as having an annual income over \$50,000.

Table 3: Bus Fare Product Usage Survey Data—Low-Income vs. Non-Low Income

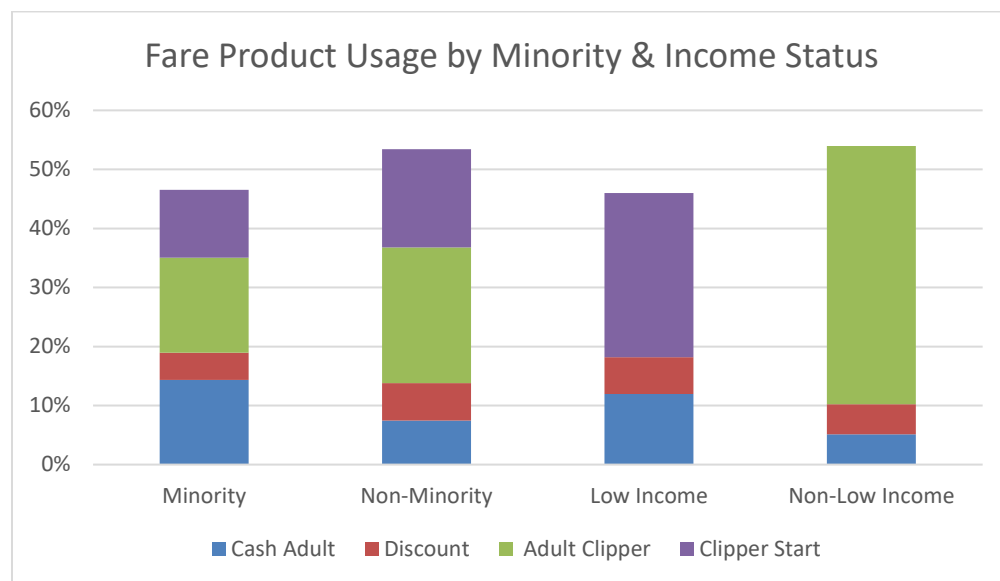
Payment Type	Low-Income	Non-Low-Income	Total
Cash Adult	21	9	30
Discount	11	9	20
Clipper	0	77	77
Clipper START	49	0	49
Total	81	95	176

Table 4: Bus Fare Product Usage by Percentage— Low-Income vs. Non-Low Income

Payment Type	Low-Income	Non-Low-Income	Total
Cash Adult	11.9%	5.1%	17%
Discount	6.3%	5.1%	11.4%
Clipper	0%	43.8%	43.8%
Clipper START	27.8%	0%	27.8%
Total	46%	54%	100%

Next, staff compared the percentage of minority riders vs. non-minority riders and of low-income vs. non-low-income riders using all fare products.

Graph 1 shows the use of each fare payment type for each category of riders: minority, non-minority, low-income, and non-low-income. Note that for the purposes of this analysis, all low-income riders who use Clipper were assumed to use the Clipper START fare discount, and so the graph shows no low-income riders paying the Adult Clipper fare. Similarly, no non-low-income customers will use the Clipper START fare.

Graph 1: Marin local Fare Product Usage Comparison

As a last step, the Golden Gate Transit Disparate Impact and Disproportionate Burden Table-Means-Based Fare, attached at the end of this report, illustrates the methodology for calculating effects of the Clipper START proposal on GGT passengers. Based on the charts above, the disparate impact analysis compares the percentage of low income users anticipated to use the Clipper START fare against the usage as a percentage of all Marin local riders.

Disproportionate Burden Analysis

Table 5: Bus Fare Impact Summary—Low Income and Non-Low Income

% Low Income in Overall Ridership	% of Means Based Fare Users Who Are Low Income	% of Non-Low-Income in Overall Ridership	% of Means Based Fare Users Who Are Non-Low Income	Difference between Low-Income Riders and Overall Riders	Exceeds Disproportionate Burden Threshold? (>10%)
46.02%	100%	53.98%	0%	-53.98%	No

As expected, the positive impact of this fare proposal will be enjoyed by a greater proportion of low-income riders than their share of the overall ridership. While low-income riders are 46.02% of Marin local ridership, they are anticipated to constitute 100% of the riders using the Clipper START Program. This is a differential of -53.98%, which is less than the District's disproportionate burden threshold of 10%. Therefore the proposal does not constitute a disproportionate burden on low-income riders.

Disparate Impact Analysis

Table 6: Bus Fare Impact Summary—Minority and Non-Minority

% Minority in Overall Ridership	% Means-Based Fare Users Who Are Minority	% Non-Minority in Overall Ridership	% of Means-Based Fare Users Who Are Non-Minority	Difference between Minority Riders and Overall Riders	Exceeds Disparate Impact Threshold? (>10%)
46.55%	40.82%	53.45%	59.18%	5.74%	No

Minority riders are 46.55% of the ridership, and are anticipated to constitute 40.82% of Clipper START fare users. Accordingly, the Clipper START fare will disproportionately benefit non-minority riders by 5.74%. However, since the disparate impact threshold is 10%, this proposal does not constitute a disparate impact on minority riders. Additionally, there are several substantial justifications for this action. Alignment of fares in Marin County between Marin Transit and GGT is necessary to maintain consistency between these two services. Further, participation in the Clipper START program increases transit access for low-income persons, many of whom have limited mobility options..

C. Conclusion

As can be seen on Tables 5 and 6 immediately above, the proposed Clipper START fares for Marin local riders of GGT will have a positive impact on low-income customers, and their impact on minority customers, though slightly less than their positive impact on non-minority customers, is within the 10% threshold established by the District. This demonstrates that there is neither a disparate impact on minority GGT riders nor a disproportionate burden on low-income GGT riders resulting from the proposed program.

EXHIBIT A: Public Outreach Process, Comments Received and the Resolution Adoption of Title VI Policies (Attached)

Public Outreach on the District's Proposed Title VI Policies (2013)

Prior to Board adoption of the District's Title VI Policies, public outreach regarding the policy proposals included:

- Informational meetings on July 8, 9 and 10, 2013, in Marin City, Novato and Rohnert Park, respectively, between 4:30 p.m. and 6:30 p.m.
- Legal notices published in the *Marin Independent Journal*, the *San Francisco Examiner* and the *Santa Rosa Press Democrat* on June 18 and 25, 2013
- Signage posted onboard the ferryboats, at the Ferry Terminals, at transit hubs in Marin and Sonoma counties, at major bus stops and at the Customer Service Center at the San Rafael Transit Center
- Display boards, staff report and comment forms, including Spanish translations
- A press release issued and posted to the District's web site on June 17, 2013, including links to the staff report in both English and Spanish
- A public hearing agenda and an associated staff report posted to the District's web site on July 8, 2013
- Information e-blasted to the Bus and Ferry Subscriber's list on June 20 and July 2, 2013
- Information posted to transit-specific social media channels on July 2 and July 8, 2013
- A public hearing agenda mailed to organizations and individuals on the District's mailing list on July 8, 2013, and posted on District bulletin boards.

Comments Received on the District's Proposed Title VI Policies (2013)

Of the comments received by the District, one alerted the District to the need to apply Title VI principles to the allocation of resources between bus and ferry services; one commented on the inconvenience of the time and location of the public hearing, service reliability, and driver attitudes; and another urged the District to reach out to community partners and agencies to get the word out about Title VI-related public hearings.

Resolution No. 2013-078 Adoption of Title VI Policies (Attached)

EXHIBIT A

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2013-078

**APPROVE ADOPTION OF POLICIES FOR GOLDEN GATE TRANSIT
AND GOLDEN GATE FERRY SERVICE AND FARE CHANGES,
UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**

August 9, 2013

WHEREAS, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) operates Golden Gate Transit (GGT) bus service and Golden Gate Ferry (GGF) service, both of which are public transportation services that occasionally receive federal funding to maintain or improve service scope and quality; and,

WHEREAS, on November 15, 2012, staff presented the Transportation Committee (Committee) with an overview of Title VI as applied to federal funding recipients, such as the District, subject to the new Circular Order issued by the Federal Transit Administration (FTA); and,

WHEREAS, on February 22, 2013, the Board approved the first action required by the new FTA Circular by adopting the required service standards and policies; and,

WHEREAS, to further comply with the new FTA Circular, the District must establish the following three policies: a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy (Three Policies); and,

WHEREAS, the Three Policies will guide when and how the District analyzes the effects of potential future fare and service changes on minority and low-income populations and, in the event the District finds disparities, the District must evaluate whether there is an alternative that has a more equitable impact; and,

WHEREAS, the new FTA Circular requires transit providers, such as the District, to solicit and consider public input before establishing such policies; and,

WHEREAS, staff presented the Three Policies to the Committee on June 13, 2013, and the Committee recommended and the Board, by Resolution No. 2013-054 at its meeting of June 14, 2013, authorized the setting of a public hearing on a proposal to establish policies for Golden Gate Transit and Golden Gate Ferry Service and for fare changes under Title IV of the Civil Rights Act of 1964 as amended; and,

WHEREAS, the District conducted outreach relative to this proposal, as follows: (1) a press release was issued on July 17, 2013; (2) information was posted on the District's website, emailed to District's opt-in subscription lists and community-based organizations, posted on District's social media sites, and published as advertisements and legal notices in several periodicals including *San Francisco Chronicle*, *Marin Independent Journal* and the *Santa Rosa Press Democrat*; (3) Public Outreach Meetings were held on July 8, 2013 in Marin City, on July 9, 2013 in Novato, and on July 10, 2013 in Rohnert Park; and, (4) Spanish translations of printed materials, website information, and community meetings were available at all public outreach meetings and at the public hearing; and,

WHEREAS, public comments on the Three Policies could be submitted by either attending the public hearing or the public outreach meetings, emailing publichearing@goldengate.org or sending written comments to the District; and,

WHEREAS, due to concerns about Marin City residents not having received sufficient advance notice of the opportunity to comment on the Three Policies, the District extended the comment period by two weeks and held an additional public outreach meeting at the Marin City Library on July 25, 2013; and,

WHEREAS, seven public comments were received by the District as of July 25, 2013, and while several comments were related to the overall topic of Title VI, none of the comments were specific to the Three Policies; and,

WHEREAS, complete copies of the Three Policies and staff's underlying analysis, as well as a summary of the comments received and staff responses, are included herein as Attachments; and,

WHEREAS, the Transportation Committee at its meeting of August 2, 2013, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves adoption of policies for Golden Gate Transit and Golden Gate Ferry Service and fare changes, under Title VI of the Civil Rights Act of 1964, as amended, and attached hereto.

RESOLUTION NO. 2013-078

BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013

PAGE 3

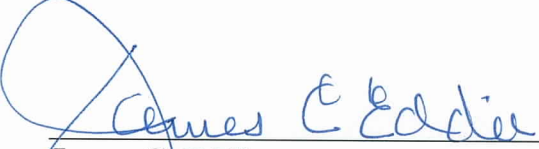
ADOPTED this 9th day of August 2013, by the following vote of the Board of Directors:

AYES (15): Directors Arnold, Belforte, Breed, Cochran, Fredericks, Moylan, Pahre, Rabbitt, Reilly, Sears, Snyder, Sobel and Theriault; Second Vice President


Stroeh; President Eddie

NOES (0): None

ABSENT (4): Directors Campos, Wiener and Yee; First Vice President Grosboll


James C. Eddie
President, Board of Directors

ATTEST:


Janet S. Tarantino
Secretary of the District

Attachment 1 - Three Policies and Analysis

Attachment 2 - Summary of Comments Received and Staff Responses

ATTACHMENT 1

Proposed Title VI Policies Pertaining to Major Service Changes, Disparate Impacts, and Disproportionate Burdens

Major Service Change Policy

The District must ensure that its services are provided equitably, without discrimination based on race, color, national origin or socio-economic status. To that end, the District must evaluate potential “major” service changes and all fare changes (except for those specifically exempt in the FTA Title VI Circular, such as Spare-the-Air Days and short-term promotional service demonstrations or fare decreases) for their impact on low-income and minority populations in its service area. Before this can occur, the District must adopt a Major Service Change policy to provide a concrete basis for determining which service changes need to be analyzed for equity.

Staff proposes the following for the District’s Major Service Change Policy:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Staff further proposes the following exemptions such that these changes would not be subject to a Title VI Equity Analysis:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (such as promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The following examples will assist the public in understanding the impact of the proposed policy.

- Example 1: If Route 11 has 20 trips a day, and the District proposes to cancel six of those trips (30%) in January 2014, then that is a major service change, and a Title VI Equity Analysis must be completed. However, if only four trips are proposed for cancellation (20%), then no analysis is required. If the District cancels these four trips and then decides to cancel two more trips in January 2015 on this same Route 11, then the percentage will again be 30% over a twenty-four month period, and an analysis will be required.
- Example 2: If Route 12 has eight trips per day and four trips are proposed for cancellation, then under the proposed policy, a Title VI Analysis is not required because the route has fewer than ten total trips per day. However, if the entire route is proposed for cancellation, then an analysis is required.
- Example 3: If Route 13 is introduced in January 1, 2014 as a demonstration service, and the District proposes to discontinue it effective December 31, 2015, then no analysis

is required when the service is introduced or discontinued. However, if the District proposes to continue the service beyond January 1, 2015, then an analysis is required for it to continue, and for it to be discontinued thereafter.

- Example 4: If Route 14 operated four times a day from Corte Madera to Petaluma, and the District planned to cease operating this trip while another transit system planned to operate the same route four times a day at the same times, with the same or better fares and transfer options, then no analysis would be required.

Disparate Impact and Disproportionate Burden Policies

When a fare change or major service change is proposed, the District must analyze whether the change will result in a fair distribution of both negative effects (such as service cuts or fare increases) and positive effects (service expansions or fare reductions, such as new discounts).

In the case of the Disparate Impact Policy, the analysis focuses on whether minority riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-minority riders or residents.

Similarly, in the case of the Disproportionate Burden Policy, the analysis focuses on whether low-income riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-low-income riders or residents.

Disparate Impact Policy

In conducting equity analyses, the Disparate Impact policy provides the threshold used to determine whether greater negative impacts – or lesser positive impacts – on **minority** riders and residents are significant.

If a proposed action would have a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or a benefit that would be available to non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. If no option with a less disparate effect exists, the District must take measures to mitigate the impact of the proposed action on the affected minority population **and** demonstrate that a legitimate business purpose cannot otherwise be accomplished.

Staff proposes the following for the District's Disparate Impact Policy:

1. The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The question that must be answered for every major service change and every fare change is: are minority riders more negatively affected (or less positively affected) by this change than riders as a whole? This is determined primarily by calculating the percentage of minority riders on

Golden Gate buses (or ferries, for a ferry service or fare change) and by calculating the percentage of minority riders affected by the change. If minorities represent a higher percentage in the impacted group than in the general ridership as a whole, the question is, how much higher? If the difference is ten percent or higher, then there is a disparate impact. As a secondary aspect of, and important precursor to, this comparative analysis, the District must define the adverse effects and/or benefits being measured for the change in question.

Some hypothetical examples of how the policy could be applied follow:

- Example 1: The District proposes to discontinue Route 16. Fifty percent of Route 16's riders belong to a minority group. If ridership on the District's bus service as a whole is 35% minority, the difference in the percentage of affected riders who are minorities and the percentage of all bus riders who are minorities is 15 percentage points. That indicates that there is a disparate impact on minority riders, and in this situation, the District would be required to evaluate whether there is an alternative with a less disparate impact on minority riders. If there is no other alternative, the District would need to mitigate the negative impact of the service cancellation on minority riders **and** demonstrate that the service reduction serves a legitimate business purpose that cannot be accomplished with less impact on minority riders.
- Example 2: The District proposes to raise fares from Zone 4 to Zone 1 by 10% and the rest of the fares only 5%. Whereas the overall ridership is 35% minority, if Zone 4 to Zone 1 riders is, for example, 46% minority, then the difference between the two groups is 11 percentage points, exceeding the 10% threshold, and there would be a disparate impact. The District would have to seek alternatives with a more equitable impact. If no such alternatives are available, then the District would have to mitigate the impact on minority riders **and** demonstrate that this fare increase serves a legitimate business purpose that cannot be accomplished in another less-discriminatory way.

Disproportionate Burden Policy

As with the Disparate Impact Policy, the Disproportionate Burden Policy comes into play when a fare change or major service change is analyzed for its equity. In this case, staff determines whether **low-income** riders and residents bear a disproportionate burden of the negative effects of – or enjoy a disproportionately low benefit from – the proposed change.

The proposed Disproportionate Burden Policy is very similar to the proposed Disparate Impact Policy and reads as follow:

2. The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

If, in the course of performing a Title VI Equity Analysis, the District finds that a proposed fare or major service change has a negative impact that affects low-income riders as compared to

non-low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income riders more than low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. Otherwise, the District must take measures to mitigate the impact of the proposed action on the affected low-income population.

Again, illustrative examples can make the uses of the policy more transparent:

- Example 1: The District proposes to discontinue Route 16. The ridership of Route 16 is 66% low-income. If ridership on the District's bus service as a whole is 50% low-income, then the difference between the low-income ridership of the Route 16 and the overall bus ridership is 16 percentage points, which means this change exceeds the threshold for disproportionate burden, or in other words, that low-income riders are bearing a disproportionate burden of this service change. In this situation, the District would be required to take measures to mitigate or lessen the impact of this change on the low-income riders of Route 16.
- Example 2: The District proposes to cut four trips on Route 21. The ridership of Route 21 is 45% low-income. If the ridership on the District's bus service as a whole is 50% low-income, then the difference is negative five percentage points (meaning the affected ridership is five percent less low-income than the overall ridership), and the burden of this change does not fall more on low-income riders than on riders as a whole.
- Example 3: The District proposes to add a new route. The residents of the areas served are 25% low-income. If the District's ridership as a whole is 50% low-income, those benefiting from the service addition are 25% less low-income than the overall ridership. There is a disproportionate benefit, and the District would be required to consider options for mitigating this disproportion.

ATTACHMENT 2

Summary of Comments Received and Staff Responses

1. **Comment:** Special fares for minorities?? Racism of the worst order.

Staff response: The public comment process is not about setting special fares for minorities but instead setting a framework for evaluating the impacts of future service or fare changes on disadvantaged communities.

2. **Comment:** I have been advocating for Title VI populations in Marin City. In order to get proper notification to minority and low-income populations adequate communication must be provided as an outreach mechanism to ensure against a community not being left out. Inasmuch as this did not happen in Marin City, where both low-income and minority residents were left out with no notification of an Open House on July 8 at the Senior Center, there is a violation of Title VI. I noticed an 8 1/2 by 11 inches poster (only one hour before the meeting) at the Marin City Hub. This was another disappointment to me and others in our community. Our shuttle service is inadequate for serving our community because of the hilly terrain.

Staff response: Given concern about the adequacy of the notification process for Marin City residents, the public comment period was extended by two weeks, additional communications were sent out, notices were posted at all bus stops in that community, and leaflets were handed out to bus riders advising that an additional public outreach meeting was scheduled in Marin City. The proposed policies are specific to regional bus and ferry services operated by the Golden Gate Bridge Highway and Transportation District. Shuttle and other fixed route and demand responsive service operated by Marin Transit and policies related to those services are the responsibility of Marin Transit.

3. **Comment:** I'm glad that you're having an additional comment period for Marin City, but in the future it's important that more advertising and outreach is implemented. Many residents were unaware about the meeting and the comment period.

Staff response: See response to Comment #2. Future outreach efforts in Marin City will include more extensive communication efforts.

4. **Comment:** It appears the proposals brought to the hearing are all about raising fares and arguing about whether or not the District can raise some and not others without discrimination. The point should be THERE SHOULD BE NO FARE INCREASES, BUT FARE DECREASES.

Staff response: The proposed policies provide a framework to evaluate future potential service and fare changes. No fare changes are proposed at this time.

5. **Comment:** The District's Allocation of resources between bus and ferry services needs to be re-evaluated in view of Title VI. There is a disproportionate amount of resources going to wealthy ferry riders and not to low-income bus riders.

Response: Duly noted. The proposed policies do not address specific to the District's allocation of transit resources between modes. The District plans to analyze the demographic characteristics of its ferry and regional bus riderships.

6. **Comment:** The job of the Golden Gate Transit District is to provide public transportation, in order to reduce automobile traffic and provide a reasonable-cost alternative to driving. The job of the District is transportation, NOT social justice, affirmative action or welfare. All this would do is raise the cost of transportation due to the additional resources needed to determine, implement and monitor these Title VI items. It is ridiculous to put the Transit District into this situation. The \$5,000 to conduct this initial public hearing will be pocket change to the cost of implementation. The bottom line is stick to your primary objective and tell the feds to make their own determinations that the Transit District is discriminatory, and make them prove it. Focus on serving the communities you service, while keeping costs down, and not on Washington D.C's social justice schemes.

Response: The proposed policies and overall compliance with Title VI is a condition of the District continuing to receive federal financial assistance for its public transportation programs.

7. **Comment:** I oppose any fare increases for the Golden Gate transit ferries, buses and bridge. The fares are exorbitant as they are now and are a huge burden on the average person's finances. This is supposed to be PUBLIC transportation, not ELITE transportation. It is only affordable to the rich.

Response: The proposed policies are not specific to any fare increase at this time. They will be used to evaluate future fare increase proposals.

EXHIBIT B: GGT Disparate Impact-Disproportionate Burden Table for Clipper Start for Marin Local Fares (Attached)

GGT Disparate Impact-Disproportionate Burden Table- Marin Local Means-Based Fare

							Usage by Group (number)					Usage by Group (percent)					Cumulative Current fare				Cumulative Proposed Fare				Fare Change Experienced by Group								
Zone to Zone	Payment Method	Pax Category	Cost 7/20	Proposed 11/20	Change Absolute	Percent	Low Income	Non-Low Income	Minority	Non Minority	Overall	Low Income	Non-Low Income	Minority	Non-Minority	Overall	Low Income	Non-Low Income	Minority	Non Minority	Low Income	Non-Low Income	Minority	Non Minority	Low Income	Non-Low Income	Minority	Non Minority					
Zone 2,3,4 AND Zone 2,3,4	Cash	Adult	\$2.00	\$2.00	\$0.00	0.00%	21.00	9.00	25.00	13.00	30.00	25.9%	9.5%	30.9%	14.0%	17.0%	\$42.00	\$18.00	\$50.00	\$26.00	\$42.00	\$18.00	\$50.00	\$26.00	\$0.00	\$0.00	\$0.00	\$0.00					
		Discount*	\$1.00	\$1.00	\$0.00	0.00%	11.00	9.00	8.00	11.00	20.00	13.6%	9.5%	9.9%	11.8%	11.4%	\$11.00	\$9.00	\$8.00	\$11.00	\$11.00	\$9.00	\$8.00	\$11.00	\$0.00	\$0.00	\$0.00	\$0.00					
		Other										0.00	0.0%	0.0%	0.0%	0.0%																	
Zone 2,3,4	Clipper	Adult	\$1.80	\$1.80	\$0.00	0.00%	0.00	77.00	28.00	40.00	77.00	0.0%	81.1%	34.6%	43.0%	43.8%	\$0.00	\$138.60	\$50.40	\$72.00	\$0.00	\$138.60	\$50.40	\$72.00	\$0.00	\$0.00	\$0.00	\$0.00					
		Means	\$1.80	\$1.00	-\$0.80	-44.44%	49.00	0.00	20.00	29.00	49.00	60.5%	0.0%	24.7%	31.2%	27.8%	\$88.20	\$0.00	\$36.00	\$52.20	\$49.00	\$0.00	\$20.00	\$29.00	-\$39.20	\$0.00	-\$16.00	-\$23.20					
TOTALS							81.00	95.00	81.00	93.00	176.00	100%	100%	100%	100%	100%																	
Total Cumulative Current Fare																	\$141.20	\$165.60	\$144.40	\$161.20													
Average Cumulative Current Fare																	\$1.74	\$1.74	\$1.78	\$1.73													
																	Total Cumulative Proposed Fare				\$102.00	\$165.60	\$128.40	\$138.00									
																	Average Cumulative Proposed Fare				\$1.26	\$1.74	\$1.59	\$1.48									
*Discount includes Senior, Youth, and Disabled fares paid both in cash and by Clipper																																	
"Other" is generally a non-cash fare such as a transfer or an employee's free ride																																	
																								Total Change in Fare per Group			-\$39.20	\$0.00	-\$16.00	-\$23.20			
																								Average Change in Fare per Group			-\$0.48	\$0.00	-\$0.20	-\$0.25			
																								Percent Change in Fare per Group			100.00%	0.00%	40.82%	59.18%			
																								Percentage Ridership of each Group (Based on all 2018 Survey Respondents)			46.02%	53.98%	46.55%	53.45%			
																								Difference from Exact Proportional Impact of Fare Change			53.98%	-53.98%	-5.74%	5.74%			
																						Findings	No disproportion- tionate burden			No disparate impact							

*Discount includes Senior, Youth, and Disabled fares paid both in cash and by Clipper
"Other" is generally a non-cash fare such as a transfer or an emoloyee's free ride

*Threshold for Disparate Impact and Disproportionage burden is 10%.
As expected, positive impact on low-income riders is 53.98% higher than on riders in general. Positive impact on minorities is 5.74% lower than on riders in general.
Therefore finding is no disparate impact and no disproportionate burden.

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Agenda Item No. (5)

To: Transportation Committee/Committee of the Whole
Meeting of July 22, 2021

From: Ron Downing, Director of Planning
Mona Babauta, Deputy General Manager, Bus Division
Denis J. Mulligan, General Manager

Subject: **ADOPT TITLE VI EQUITY ANALYSIS FINDINGS RELATIVE TO
COVID-19 PANDEMIC-RELATED ADJUSTMENTS TO GOLDEN GATE
TRANSIT COMMUTE BUS SERVICE**

Recommendation

The Transportation Committee recommends that the Board of Directors adopt the findings of the Title VI equity analysis for Golden Gate Transit commute bus service changes related to the COVID-19 pandemic. Changes include service reductions on Routes 27, 54, and 72 and the suspension of Routes 2, 4, 8, 18, 24, 25, 38, 56X, 58, 74, 76, and 92 (including all lettered variations of the impacted routes). The equity analysis concludes that the changes do not have a disparate impact on minority passengers nor impose a disproportionate burden on low-income passengers.

This matter will be presented to the Board of Directors at its July 23, 2021, meeting for appropriate action.

Background

The Golden Gate Bridge, Highway and Transportation District's (District) transit services were modified over the course of the COVID-19 pandemic, with reductions in bus and ferry service beginning with the first shelter-in-place order effective March 17, 2020. Changes to bus routes continued throughout 2020 to meet evolving demand and the operational parameters of social distancing requirements, driver availability, and other factors. By the end of 2020, only seven Golden Gate Transit (GGT) routes remained in operation. Four of those routes provided regional all-day, seven day a week service operating 16 to 21 hours each day. These four routes (30, 40, 70, and 101) were maintained to provide equity in mobility options for low-income, minority, and transit-dependent riders as well as essential workers. The State of California lifted nearly all pandemic-related restrictions on June 15, 2021, and the District has begun to see a modest return of transit riders to its buses and ferries.

Title VI guidelines issued by the Federal Transit Administration (FTA) require the District to conduct service equity analyses to consider whether contemplated major service changes will

disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area. The Title VI policy approved by the District's Board of Directors (Board) in August 2013 defines major service changes (in relevant part) as service increases or decreases which affect 25% or more of revenue service miles per route and which will be in effect for more than 12 months.

Several GGT bus service changes resulting from the pandemic meet this threshold and are the subject of the attached Title VI equity analysis. Adoption of this analysis, which focuses on the GGT service model being operated at this time, will establish a new baseline for GGT bus service against which future potential service changes will be evaluated for Title VI purposes. More specifically, it is recommended that action be taken now to accept the findings of an equity analysis of commute bus service adjustments to suspend Routes 2, 4, 8, 18, 24, 25, 38, 56X, 58, 74, 76, and 92, and to reduce service levels on Routes 27, 54, and 72. This action includes lettered variations of the impacted routes, such as 38A or 72X. Routes 30, 40, 70, and 101 are not covered by this equity analysis because these routes were maintained within 25% of pre-pandemic levels.

All routes covered by this equity analysis provide commute bus service from neighborhoods throughout Marin and Sonoma Counties to the Financial District or Civic Center area of San Francisco, either directly or via transfer to the Larkspur Ferry in the case of Route 25. These routes primarily operate during weekday peak periods with southbound service in the morning and return service in the afternoon, and carry riders who typically have higher incomes and access to automobiles to either drive to work or access other transit options. Transit service alternatives remain available for all the routes impacted by service reductions or cancellations, either on other existing GGT routes, on Golden Gate Ferry (GGF), or by connecting from SMART trains or local bus lines to remaining GGT and GGF routes.

GGF ferry service changes resulting from the pandemic also have met the threshold for a Title VI equity analysis. However, staff has determined that resetting the baseline service model for GGF is not appropriate at this time as the fixed-guideway nature of ferry service limits options for restructuring the ferry service model and relaunching more robust ferry service, particularly as compared to the greater flexibility available for redeploying bus service as commute patterns evolve. Staff will engage with the FTA regarding the timing of a potential GGF service equity analysis, and report back to the Board.

Action to adopt the findings of the attached equity analysis does not preclude the restoration of service or implementation of new service as demand warrants, so the District will continue to restore bus service incrementally and in a measured way as we see the return of our customers travelling in the Golden Gate Corridor. Service restoration and other service changes will continue under the General Manager's emergency authority, and any public hearings and Title VI equity analyses required for future service changes will be performed in accordance with the District's major service change policy and FTA Title VI guidelines at such time as these services are deemed to be permanent, generally in nine months to one year after their inception.

Title VI Findings

Service reductions on Routes 2, 4, 8, 18, 25, 27, 38, 54, 56X, 58, 72, 74, 76, and 92 (including all lettered variations of these routes) were determined to constitute major service changes based on

Title VI guidelines issued by the FTA and the Title VI policy approved by the Board. An equity analysis was performed, and it was determined that these changes constitute neither a disparate impact on minority riders nor a disproportionate burden on low-income riders. As noted above, the attached analysis does not address GGF ferry service changes, which may be addressed further following consultation with the FTA.

Fiscal Impact

There is no fiscal impact associated with adoption of the findings of this Title VI equity analysis.

Attachments: Appendix A – Title VI Equity Analysis

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Appendix A
Title VI Equity Analysis: COVID-19 Pandemic-Related
Golden Gate Transit Bus Service Adjustments

Presented to the Golden Gate Bridge, Highway and Transportation District
Transportation Committee
July 22, 2021

With the advent of COVID-19 in California and the San Francisco Bay Area, and the resulting drastic decreases in ridership on Golden Gate Transit (GGT) and Golden Gate Ferry (GGF), the Golden Gate Bridge, Highway and Transportation District (District) was compelled to reduce service to a level commensurate with ridership and revenues between March 2020 and June 2021. GGT bus and GGF ferry service levels have changed several times during the pandemic; the District now desires to establish new baseline service levels for its bus system, against which future changes will be measured.

Title VI guidelines issued by the Federal Transit Administration (FTA) require the District to conduct service equity analyses to consider whether contemplated major service changes will disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area. The Title VI policy approved by the District's Board of Directors (Board) in August 2013 defines major service changes (in relevant part) as service increases or decreases which affect 25% or more of revenue service miles per route and which will be in effect for more than 12 months.

Several GGT service changes resulting from the pandemic meet this threshold and are the subject of the attached Title VI equity analysis. Adoption of this analysis, which focuses on the GGT service model being operated at this time, will establish a new baseline for GGT bus service against which future service changes will be evaluated Title VI purposes.

GGF ferry service changes resulting from the pandemic also have met the threshold for an analysis. However, staff has determined that resetting the baseline model for GGF is not appropriate at this time as the fixed-guideway nature of ferry service limits options for restructuring the ferry service model and relaunching more robust ferry service, particularly as compared to the greater flexibility available for redeploying bus service as commute patterns evolve. Staff will engage with the FTA regarding a potential GGF service equity analysis, and report back to the Board.

The required components of this analysis are set forth in FTA regulations and Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients") implementing Title VI of the Civil Rights Act of 1964 and the District's Title VI Policies.

I. Context of Service Reductions Resulting from the COVID 19 Pandemic

Studies have now revealed that the first cases of COVID-19 arrived in the San Francisco Bay Area in December 2019. The City and County of San Francisco declared a health emergency on February 26, 2020, and other Bay Area counties soon followed suit. Stay-at-home orders were issued by the counties in the District's service area in mid-March of 2020. From a daily weekday

average of over 16,000 passengers on GGT, counts dropped to around 3,300 per day starting March 16, and down to less than 2,500 per weekday in April 2020. Ridership on GGT fluctuated with the rise and fall of COVID and rose to around 4,750 riders per day for the last service month completed prior to preparation of this analysis, May 2021.

Reductions in GGT bus and GGF ferry service began with the first shelter-in-place order effective March 17, 2020. Changes to bus routes continued throughout 2020 to meet evolving demand and the operational parameters of social distancing requirements, driver availability, and other factors. By the end of 2020, only seven GGT routes remained in operation.

GGF service also was reduced in response to a dramatic loss of ridership in mid-March 2020. Because of the flexibility of ferry scheduling, the ferry division was able to reduce service quickly, during the week of March 16, 2020, including suspension of all weekend ferry service. Further reductions were made on all three ferry routes in the first week of April, 2020. Trips per weekday went from 72 to 39 and then to 22. Larkspur and Sausalito service, combined, went from 14 trips per weekend day to zero trips. In March of 2021, Sausalito weekday service was temporarily replaced by bus service during dock repairs at the Sausalito landing, but weekday Sausalito ferry service resumed effective June 23, 2021.

II. Title VI Policies

The District adopted its Major Service Change, Disparate Impact and Disproportionate Burden Policies (together referred to as “Title VI Policies”) on August 9, 2013. These policies set forth the standards used in service equity analyses. The District’s Major Service Change Policy reads in relevant part:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

The following are exemptions to the policy:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The District’s Disparate Impact policy provides:

- The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The District's Disproportionate Burden Policy provides:

- The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change... or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

Public Outreach

Prior to Board adoption of the District's Title VI Policies, public outreach regarding the policy proposals included:

- Informational meetings on July 8, 9 and July 10, 2013, in Marin County, Novato and Rohnert Park, respectively, between 4:30 p.m. and 6:30 p.m.
- Legal notices published in the *Marin Independent Journal*, the *San Francisco Examiner* and the *Santa Rosa Press Democrat* on June 18 and 25, 2013
- Signage posted onboard the ferryboats, at the Ferry Terminals, at transit hubs in Marin and Sonoma counties, at major bus stops and at the Customer Service Center at the San Rafael Transit Center
- Display boards, staff report and comment forms, including Spanish translations
- A press release issued and posted to the District's web site on June 17, 2013, including links to the staff report in both English and Spanish
- A public hearing agenda and an associated staff report posted to the District's web site on July 8, 2013
- Information e-blasted to the Bus and Ferry Subscriber's list on June 20 and July 2, 2013
- Information posted to transit-specific social media channels on July 2 and July 8, 2013
- A public hearing agenda mailed to organizations and individuals on the District's mailing list on July 8, 2013, and posted on District bulletin boards.

Comments Received

Of the comments received by the District, one alerted the District to the need to apply Title VI principles to the allocation of resources between bus and ferry services; one commented on the inconvenience of the time and location of the public hearing, service reliability, and driver attitudes; and another urged the District to reach out to community partners and agencies to get the word out about Title VI-related public hearings.

The resolution evidencing the Board's discussion and approval of the policies is attached as Exhibit A.

III. Golden Gate Transit Bus and Ferry Services

GGT Bus Services

GGT bus services are generally delineated as “Commute” and “Regional.” Generally, “Commute” bus service is express, peak-period one-directional service between Sonoma or Marin County to/from San Francisco, plus shuttle-type routes designed specifically to take passengers from their places of origin to/from the primary Commute routes. “Regional” bus service, on the other hand, operates seven days a week over most of the day/night to provide basic mobility throughout the District’s service area. More specifically:

- *Transbay Commute Service* provides commute service during morning and afternoon peak-hour periods. Commute routes operate Monday through Friday, except designated holidays, and serve San Francisco, Marin, and Sonoma counties. Before service reductions, commute routes included Routes 2, 4, 4C, 8, 18, 24, 24C, 24X, 27, 38, 44, 54, 54C, 56, 58, 72, 72X, 74, 76, 92, and 101X. Current commute routes are comprised of Routes 27, 54, and 72.
- *Transbay Regional Service* provides daily service throughout the day and evening between San Francisco, Marin, Sonoma, and Contra Costa counties. Current Basic routes include Routes 30, 40, 70, and 101. Route 101 receives moderate funding from the MTC’s Regional Express Bus (REB) program.

GGF Ferry Services

The District’s Golden Gate Ferry service includes five routes between Marin County and San Francisco: Sausalito, Larkspur, Tiburon, Special Event service to Oracle Park, and Special Event service to the Chase Center. Under normal circumstances, ferry service operates daily except Thanksgiving, Christmas, and New Year’s Day.

- Sausalito Ferry Service provides daily connections between the Golden Gate Ferry landing in Sausalito and the San Francisco Ferry Terminal. This 5.5 nautical-mile route has been in operation since 1970. Before the pandemic, the service provided 18 crossings on weekdays and 12 crossings on weekends and holidays. The service operated between 7:10 am and 8:20 pm on weekdays, and between 10:40 am and 7:15 pm on weekends and holidays. Currently, weekend service is suspended, and weekday service consists of one southbound trip during the morning commute period, one southbound trip during the evening commute period, and two northbound trips during the evening commute period.
- Larkspur Ferry Service features an 11.25 nautical-mile route between the Larkspur Ferry Terminal and the San Francisco Ferry Terminal. Before the pandemic, the 40 weekday and eight weekend/holiday crossings required a fleet of five vessels. Services operated between 5:45 am and 10:05 pm on weekdays, and between 9:40 am and 8:10 pm on weekends and holidays. Currently, weekend service is suspended, and seven round trips are operated on weekdays for a total of 14 crossings.
- Tiburon Ferry weekday commute service features a 5.94 nautical-mile route between the Tiburon Ferry dock and the San Francisco Ferry Terminal. Pre-pandemic service provided four round-trips daily, restricted to the commute period. Currently, the service offers one southbound trip during the morning commute period, one southbound trip during the evening commute period, and two northbound trips during the evening commute period.

- Special Event Service to Oracle Park was suspended for most of the pandemic but now has returned and will be offered during all San Francisco Giants' home games and a number of other special events. The 13.1 nautical-mile route between the Larkspur Ferry Terminal and the dock at Oracle Park takes approximately 60 minutes. One round trip is offered for each event served, which typically totals between 80 and 90 round trips per year.
- Special Event Service to the Chase Center was suspended for the duration of the pandemic.

IV. Service Cancellations, Purpose and Public Outreach

With the advent of the pandemic there was a precipitous drop in travel in the Golden Gate Corridor, whether by Bridge, bus or ferry. With the drop in demand for District transit services, both commute and basic GGT bus services were reduced drastically in June 2020 and once again in December 2020, while GGF ferry services were reduced in March 2020 and then again in April 2020.

The reductions in bus and ferry service were a response to the drastic reduction in travel in the Golden Gate Corridor arising from the Shelter-in-Place Orders issued by our local public health officials, and the overnight shift to working from home for many residents in the District's service area, and the associated drop in revenues and made on an emergency basis, so no public outreach was implemented.

The following map shows the location of both GGF and GGT services relative to major destination and boarding locations.

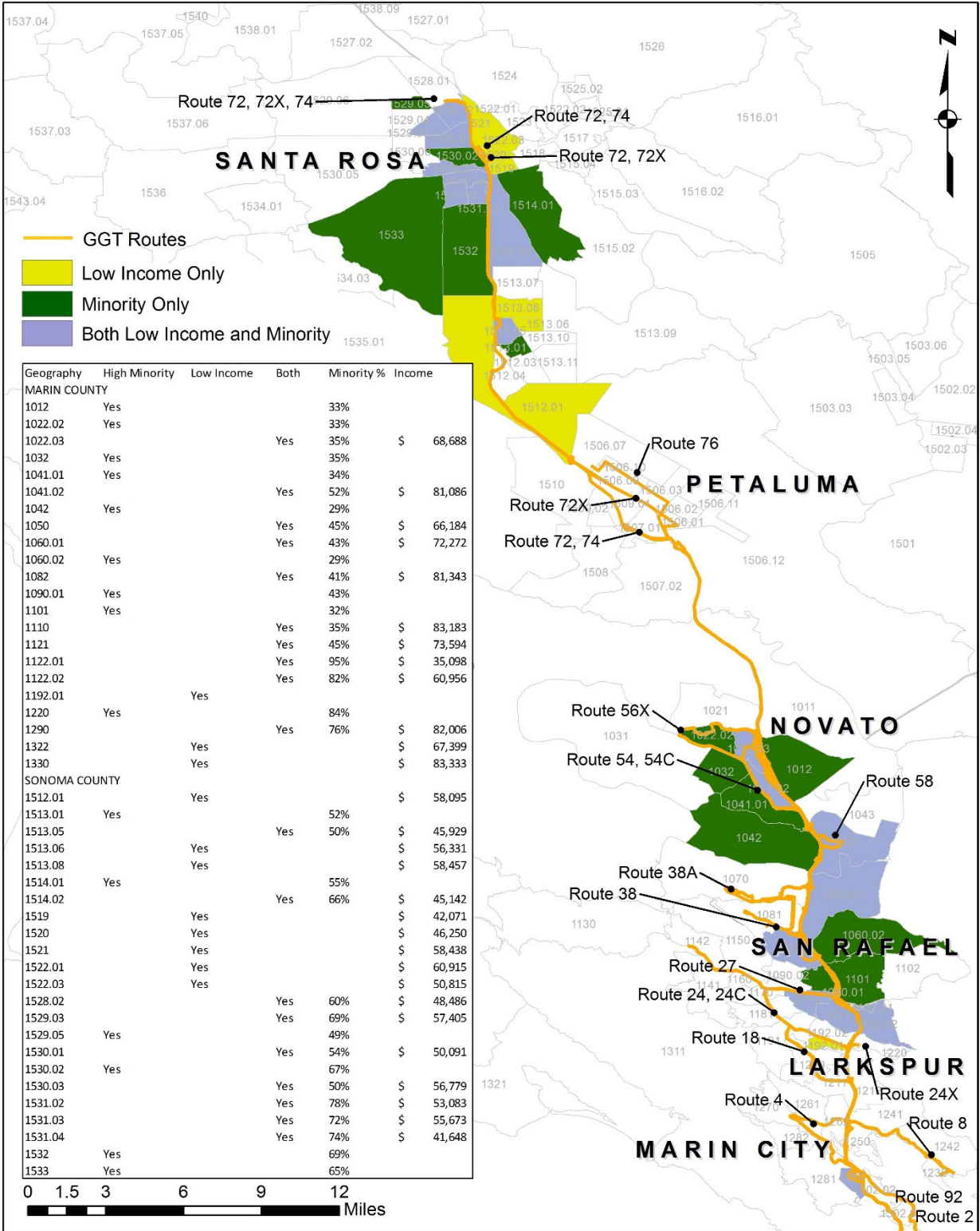
Golden Gate Transit and Ferry Service Area Map



The following map shows the GGT routes with major service changes, along with demographic information showing minority and low-income populations in the service area.

GGT SERVICE AREA

GGT service area includes all of Marin & Sonoma counties. Source: ACS Census 2013-2017. Tables S1903 & BO3002.



V. Title VI Equity Analysis for the 2020 Pandemic-Related GGT Bus Service Reductions

Below is a table that shows the GGT bus routes that underwent service changes, including an indication of which were the subject of major service changes, as defined above. As described above, a major service change is defined as a 25% increase or reduction in mileage. For the routes that experienced a major service change, an Equity Analysis is required to determine whether the changes will result in a disparate impact to minority populations or a disproportionate burden on low-income populations, based on the District's Title VI Policies.

Route	Weekly Miles as of December 2021	Weekly Miles as of June 2021	Reduction	Major Service Change?
2	695.1	0	100.00%	YES
4/4C	5,213.57	0	100.00%	YES
8	293.215	0	100.00%	YES
18	1,829.445	0	100.00%	YES
24/24C/24X	3,552.975	0	100.00%	YES
25	647.02	0	100.00%	YES
27	3,710.25	1,194.155	67.81%	YES
30	5,982.306	5,538.859	7.41%	NO
38/38A	1,508.5	0	100.00%	YES
40/40X	4,620.431	3,489.212	24.48%	NO
54/54C	3,667.695	1,303.92	64.45%	YES
56X	3,699.1	0	100.00%	YES
58	1,301.94	0	100.00%	YES
70	8,587.875	7,201.588	16.14%	NO
72	6,069.595	3,691.91	39.17%	YES
74	3,069.125	0	100.00%	YES
76	2,090.22	0	100.00%	YES
92	1,223.82	0	100.00%	YES
101/101X	21,262.395	18,668.668	12.20%	NO

Equity Analysis Methodology

The FTA Circular states that for elimination of a route, the appropriate comparison population is the ridership of the affected route as compared to the ridership of the system as a whole.

Data Sources

All data on minority and low-income percentages by route was derived from the District's 2018 system-wide passenger survey, conducted as part of the Metropolitan Transportation Commission's (MTC) region-wide passenger survey. The consultant selected by MTC and by District Staff surveyed all of the District's services, including GGT and GGF. Data was collected on-board a sample of bus and ferry trips. Questionnaires were in Spanish and English and included questions about the trip being taken and demographics.

For the purpose of the disproportionate burden analysis, Staff determined riders with a household income of less than \$75,000 per year to be low income. Marin County, where riders on most of GGT's commute service reside, has a comparatively high median income (\$97,815, from the 2012-2016 American Community Survey). In order to reflect the high cost of living in the San Francisco Bay Area, District Staff uses 90% of the median income – \$88,034 – for the service area as the low-income cut-off. Federal poverty standards are not a good fit for an area where the cost of living is so much higher than most localities. To compare, in 2021, the California State Income Limits that are used to determine eligibility for low-cost housing and other programs gave a range of \$63,950 for a single-person household to \$120,600 for an 8-person household for the “very low income” designation for Marin County (there are also “low income” and “extremely low income” categories). As data was collected in fixed groupings during the District's most recent passenger survey, and \$75,000 is the closest grouping to \$88,034, we will use household incomes of \$75,000 or less as the definition of low-income.

Average daily ridership counts are based on data collected daily from onboard fare boxes and Clipper® Smart card readers. The data is kept in District databases and accessed by staff via District-created software.

Methodology

To determine whether the major services changes, considered as a whole, result in a disproportionate burden on low-income passengers, or a disparate impact on minority passengers, we

- i. Multiply (a) the average daily ridership numbers for each route by (b) the percent of low-income and minority passengers on the same routes, to find (c) the estimated number of impacted low-income/non-low-income and minority/non-minority passengers effected by each service change
- ii. Calculate what percentage of all effected passengers are low-income and what percent are minority
- iii. Compare these percentages to the percent of GGT passengers overall who have low incomes or are minorities.

Disproportionate Burden Analysis

Table 1: Disproportionate Burden Analysis

Routes with Major Service Changes	Daily Ridership 9/19-2/20	Low-Income	Non-Low-Income	Refused	Est. Low-Income Ridership	Est. Non-Low-Income Ridership
2	225	40%	26%	33%	90	58.5
4/4C	1,426	27%	56%	15%	385.02	798.56
8	26	18%	82%	0%	4.68	21.32
18	531	53%	41%	6%	281.43	217.71
24/24C/24X	736	22%	48%	30%	161.92	353.28
25	151	26%	59%	16%	39.26	89.09
27	645	39%	39%	24%	251.55	251.55
38/38A	300	64%	30%	6%	192	90
54/54C	574	84%	11%	5%	482.16	63.14
56X	289	64%	16%	20%	184.96	46.24
58	142	56%	10%	4%	79.52	14.2
72/72X	515	50%	44%	5%	257.5	226.6
74	240	12%	66%	22%	28.8	158.4
76	243	42%	54%	5%	102.06	131.22
92	236	53%	31%	15%	125.08	73.16
Total for Routes with Major Service Changes	6,279	42%	41%	16%	2,665.94	2592.97
All GGT Routes		52%	33%	15%		

Table 1 shows the percentages of low-income and non-low-income riders on each impacted route when multiplied with the average daily ridership for the six full months preceding the pandemic (September 2019 through February 2020), giving an estimated low-income and non-low-income ridership number for each route. Under “Total for Routes with Major Service Changes,” the table shows the estimated number and percentage of effected low-income and non-low income riders. Using the cut-off of **\$75,000** to define “low-income,” 52% of all bus riders are low-income, whereas 42% of riders on routes with major service reductions are low-income.

Disparate Impact Analysis

Table 2: Disparate Impact Analysis

Routes with Major Service Changes	Daily Ridership 9/19-2/20	Minority	Non-Minority	Refused	Est. Low-Income Ridership	Est. Non-Low-Income Ridership
2	225	32%	67%	33%	72	150.75
4/4C	1426	27%	70%	15%	385.02	998.2
8	26	15%	85%	0%	3.9	22.1
18	531	45%	55%	6%	238.95	292.05
24/24C/24X	736	42%	58%	30%	309.12	426.88
25	151	37%	63%	16%	55.87	95.13
27	645	38%	62%	24%	245.1	399.9
38/38A	300	33%	67%	6%	99	201
54/54C	574	29%	71%	5%	166.46	407.54
56X	289	32%	68%	20%	92.48	196.52
58	142	47%	53%	4%	66.74	75.26
72/72X	515	34%	66%	5%	175.1	339.9
74	240	21%	79%	22%	50.4	189.6
76	243	18%	82%	5%	43.74	199.26
92	236	29%	71%	15%	68.44	167.56
Total for Routes with Major Service Changes	6,279	33%	66%	0.72%	2,072.32	4,161.65
All GGT Routes		42%	58%	.2%		

Table 2 shows the percentages of minority and non-minority riders on each impacted route, giving an estimated minority and non-minority ridership number for each route. Under “Total for Routes with Major Service Changes,” the table shows the estimated number and percentage of minority and non-minority riders. As seen above, 42% of all GGT bus riders reported identifying with a race and ethnicity other than “White Non-Hispanic,” whereas 33% of riders on routes with major service reductions reported themselves as other than “White Non-Hispanic.”

Equity Analysis Findings

As shown above, the major service reductions put in place as a result of the pandemic do not represent a disproportionate burden on low-income riders nor a disparate impact on minority

riders. Rather, the representation of both low-income riders and minority riders on the affected routes is *lower* than the proportion of low-income riders and minority riders on GGT services overall.

As shown in Table 3 below, whereas 52% of all GGT bus riders are low-income, only 42% of riders on routes impacted by the pandemic service reductions are low-income. In other words, there are 10% fewer low-income riders on the affected routes than on Golden Gate Transit as a whole. Under the District's Title VI Policies, disproportionate burden is defined as a difference of 10% or more (with the higher proportion on the side of the affected group of riders). Because the affected group is 10% *less* likely to be low income than GGT riders as a whole, there is no disproportionate burden.

Table 3. Low-Income and Non-Low Income Ridership

	Golden Gate Bus Ridership	Ridership of impacted routes	Difference
Low-Income (less than \$75,000)	52%	42%	10%
Non-Low-Income	33%	41%	-8%

As shown in Table 4 below, 42% of passengers on GGT bus service overall identify as a member of a minority. On the routes impacted by the pandemic-related service reductions, only 33% of passengers identify as minority. Thus, there are 9% fewer minority riders on the impacted routes than on Golden Gate buses as a whole. The District's disparate impact policy defines a disparate impact as one of 10% or greater (with the higher proportion on the side of the affected group of riders). Accordingly, there is no disparate impact on minority riders from this service reduction.

Table 4. Minority and Non-Minority Ridership

	Golden Gate Bus Ridership	Ridership of impacted routes	Difference
Minority	42%	33%	9%
Non-Minority	58%	66%	-8%

Conclusion

The service reductions put in place as a result of the pandemic do not constitute a disparate impact on minority riders nor a disproportionate burden on low-income riders under the District's Title VI Policies.

Attachment: Exhibit A: Resolution 2013-078: Approve Adoption of Title VI Policies for Golden Gate Transit and Golden Gate Ferry Service and Fare Changes

EXHIBIT A

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2013-078

**APPROVE ADOPTION OF POLICIES FOR GOLDEN GATE TRANSIT
AND GOLDEN GATE FERRY SERVICE AND FARE CHANGES,
UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**

August 9, 2013

WHEREAS, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) operates Golden Gate Transit (GGT) bus service and Golden Gate Ferry (GGF) service, both of which are public transportation services that occasionally receive federal funding to maintain or improve service scope and quality; and,

WHEREAS, on November 15, 2012, staff presented the Transportation Committee (Committee) with an overview of Title VI as applied to federal funding recipients, such as the District, subject to the new Circular Order issued by the Federal Transit Administration (FTA); and,

WHEREAS, on February 22, 2013, the Board approved the first action required by the new FTA Circular by adopting the required service standards and policies; and,

WHEREAS, to further comply with the new FTA Circular, the District must establish the following three policies: a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy (Three Policies); and,

WHEREAS, the Three Policies will guide when and how the District analyzes the effects of potential future fare and service changes on minority and low-income populations and, in the event the District finds disparities, the District must evaluate whether there is an alternative that has a more equitable impact; and,

WHEREAS, the new FTA Circular requires transit providers, such as the District, to solicit and consider public input before establishing such policies; and,

WHEREAS, staff presented the Three Policies to the Committee on June 13, 2013, and the Committee recommended and the Board, by Resolution No. 2013-054 at its meeting of June 14, 2013, authorized the setting of a public hearing on a proposal to establish policies for Golden Gate Transit and Golden Gate Ferry Service and for fare changes under Title IV of the Civil Rights Act of 1964 as amended; and,

WHEREAS, the District conducted outreach relative to this proposal, as follows: (1) a press release was issued on July 17, 2013; (2) information was posted on the District's website, emailed to District's opt-in subscription lists and community-based organizations, posted on District's social media sites, and published as advertisements and legal notices in several periodicals including *San Francisco Chronicle*, *Marin Independent Journal* and the *Santa Rosa Press Democrat*; (3) Public Outreach Meetings were held on July 8, 2013 in Marin City, on July 9, 2013 in Novato, and on July 10, 2013 in Rohnert Park; and, (4) Spanish translations of printed materials, website information, and community meetings were available at all public outreach meetings and at the public hearing; and,

WHEREAS, public comments on the Three Policies could be submitted by either attending the public hearing or the public outreach meetings, emailing publichearing@goldengate.org or sending written comments to the District; and,

WHEREAS, due to concerns about Marin City residents not having received sufficient advance notice of the opportunity to comment on the Three Policies, the District extended the comment period by two weeks and held an additional public outreach meeting at the Marin City Library on July 25, 2013; and,

WHEREAS, seven public comments were received by the District as of July 25, 2013, and while several comments were related to the overall topic of Title VI, none of the comments were specific to the Three Policies; and,

WHEREAS, complete copies of the Three Policies and staff's underlying analysis, as well as a summary of the comments received and staff responses, are included herein as Attachments; and,

WHEREAS, the Transportation Committee at its meeting of August 2, 2013, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves adoption of policies for Golden Gate Transit and Golden Gate Ferry Service and fare changes, under Title VI of the Civil Rights Act of 1964, as amended, and attached hereto.

RESOLUTION NO. 2013-078

BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013

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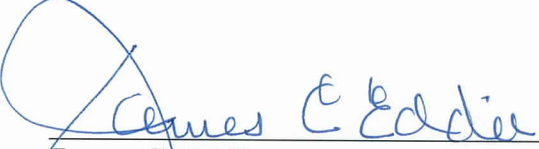
ADOPTED this 9th day of August 2013, by the following vote of the Board of Directors:

AYES (15): Directors Arnold, Belforte, Breed, Cochran, Fredericks, Moylan, Pahre, Rabbitt, Reilly, Sears, Snyder, Sobel and Theriault; Second Vice President


Stroeh; President Eddie

NOES (0): None

ABSENT (4): Directors Campos, Wiener and Yee; First Vice President Grosboll


James C. Eddie
President, Board of Directors

ATTEST:


Janet S. Tarantino
Secretary of the District

Attachment 1 - Three Policies and Analysis

Attachment 2 - Summary of Comments Received and Staff Responses

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ATTACHMENT 1

Proposed Title VI Policies Pertaining to Major Service Changes, Disparate Impacts, and Disproportionate Burdens

Major Service Change Policy

The District must ensure that its services are provided equitably, without discrimination based on race, color, national origin or socio-economic status. To that end, the District must evaluate potential “major” service changes and all fare changes (except for those specifically exempt in the FTA Title VI Circular, such as Spare-the-Air Days and short-term promotional service demonstrations or fare decreases) for their impact on low-income and minority populations in its service area. Before this can occur, the District must adopt a Major Service Change policy to provide a concrete basis for determining which service changes need to be analyzed for equity.

Staff proposes the following for the District’s Major Service Change Policy:

- A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Staff further proposes the following exemptions such that these changes would not be subject to a Title VI Equity Analysis:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (such as promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered “major,” as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered “major.”

The following examples will assist the public in understanding the impact of the proposed policy.

- Example 1: If Route 11 has 20 trips a day, and the District proposes to cancel six of those trips (30%) in January 2014, then that is a major service change, and a Title VI Equity Analysis must be completed. However, if only four trips are proposed for cancellation (20%), then no analysis is required. If the District cancels these four trips and then decides to cancel two more trips in January 2015 on this same Route 11, then the percentage will again be 30% over a twenty-four month period, and an analysis will be required.
- Example 2: If Route 12 has eight trips per day and four trips are proposed for cancellation, then under the proposed policy, a Title VI Analysis is not required because the route has fewer than ten total trips per day. However, if the entire route is proposed for cancellation, then an analysis is required.
- Example 3: If Route 13 is introduced in January 1, 2014 as a demonstration service, and the District proposes to discontinue it effective December 31, 2015, then no analysis

is required when the service is introduced or discontinued. However, if the District proposes to continue the service beyond January 1, 2015, then an analysis is required for it to continue, and for it to be discontinued thereafter.

- Example 4: If Route 14 operated four times a day from Corte Madera to Petaluma, and the District planned to cease operating this trip while another transit system planned to operate the same route four times a day at the same times, with the same or better fares and transfer options, then no analysis would be required.

Disparate Impact and Disproportionate Burden Policies

When a fare change or major service change is proposed, the District must analyze whether the change will result in a fair distribution of both negative effects (such as service cuts or fare increases) and positive effects (service expansions or fare reductions, such as new discounts).

In the case of the Disparate Impact Policy, the analysis focuses on whether minority riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-minority riders or residents.

Similarly, in the case of the Disproportionate Burden Policy, the analysis focuses on whether low-income riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-low-income riders or residents.

Disparate Impact Policy

In conducting equity analyses, the Disparate Impact policy provides the threshold used to determine whether greater negative impacts – or lesser positive impacts – on **minority** riders and residents are significant.

If a proposed action would have a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or a benefit that would be available to non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. If no option with a less disparate effect exists, the District must take measures to mitigate the impact of the proposed action on the affected minority population **and** demonstrate that a legitimate business purpose cannot otherwise be accomplished.

Staff proposes the following for the District's Disparate Impact Policy:

1. The District defines its Disparate Impact Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

The question that must be answered for every major service change and every fare change is: are minority riders more negatively affected (or less positively affected) by this change than riders as a whole? This is determined primarily by calculating the percentage of minority riders on

Golden Gate buses (or ferries, for a ferry service or fare change) and by calculating the percentage of minority riders affected by the change. If minorities represent a higher percentage in the impacted group than in the general ridership as a whole, the question is, how much higher? If the difference is ten percent or higher, then there is a disparate impact. As a secondary aspect of, and important precursor to, this comparative analysis, the District must define the adverse effects and/or benefits being measured for the change in question.

Some hypothetical examples of how the policy could be applied follow:

- Example 1: The District proposes to discontinue Route 16. Fifty percent of Route 16's riders belong to a minority group. If ridership on the District's bus service as a whole is 35% minority, the difference in the percentage of affected riders who are minorities and the percentage of all bus riders who are minorities is 15 percentage points. That indicates that there is a disparate impact on minority riders, and in this situation, the District would be required to evaluate whether there is an alternative with a less disparate impact on minority riders. If there is no other alternative, the District would need to mitigate the negative impact of the service cancellation on minority riders **and** demonstrate that the service reduction serves a legitimate business purpose that cannot be accomplished with less impact on minority riders.
- Example 2: The District proposes to raise fares from Zone 4 to Zone 1 by 10% and the rest of the fares only 5%. Whereas the overall ridership is 35% minority, if Zone 4 to Zone 1 riders is, for example, 46% minority, then the difference between the two groups is 11 percentage points, exceeding the 10% threshold, and there would be a disparate impact. The District would have to seek alternatives with a more equitable impact. If no such alternatives are available, then the District would have to mitigate the impact on minority riders **and** demonstrate that this fare increase serves a legitimate business purpose that cannot be accomplished in another less-discriminatory way.

Disproportionate Burden Policy

As with the Disparate Impact Policy, the Disproportionate Burden Policy comes into play when a fare change or major service change is analyzed for its equity. In this case, staff determines whether **low-income** riders and residents bear a disproportionate burden of the negative effects of – or enjoy a disproportionately low benefit from – the proposed change.

The proposed Disproportionate Burden Policy is very similar to the proposed Disparate Impact Policy and reads as follow:

2. The District defines its Disproportionate Burden Threshold for determining whether the burdens or benefits of a major service change (as defined in the first part of this document) or a fare adjustment are equitable to be 10%, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

If, in the course of performing a Title VI Equity Analysis, the District finds that a proposed fare or major service change has a negative impact that affects low-income riders as compared to

non-low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income riders more than low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. Otherwise, the District must take measures to mitigate the impact of the proposed action on the affected low-income population.

Again, illustrative examples can make the uses of the policy more transparent:

- Example 1: The District proposes to discontinue Route 16. The ridership of Route 16 is 66% low-income. If ridership on the District's bus service as a whole is 50% low-income, then the difference between the low-income ridership of the Route 16 and the overall bus ridership is 16 percentage points, which means this change exceeds the threshold for disproportionate burden, or in other words, that low-income riders are bearing a disproportionate burden of this service change. In this situation, the District would be required to take measures to mitigate or lessen the impact of this change on the low-income riders of Route 16.
- Example 2: The District proposes to cut four trips on Route 21. The ridership of Route 21 is 45% low-income. If the ridership on the District's bus service as a whole is 50% low-income, then the difference is negative five percentage points (meaning the affected ridership is five percent less low-income than the overall ridership), and the burden of this change does not fall more on low-income riders than on riders as a whole.
- Example 3: The District proposes to add a new route. The residents of the areas served are 25% low-income. If the District's ridership as a whole is 50% low-income, those benefiting from the service addition are 25% less low-income than the overall ridership. There is a disproportionate benefit, and the District would be required to consider options for mitigating this disproportion.

ATTACHMENT 2

Summary of Comments Received and Staff Responses

1. **Comment:** Special fares for minorities?? Racism of the worst order.

Staff response: The public comment process is not about setting special fares for minorities but instead setting a framework for evaluating the impacts of future service or fare changes on disadvantaged communities.

2. **Comment:** I have been advocating for Title VI populations in Marin City. In order to get proper notification to minority and low-income populations adequate communication must be provided as an outreach mechanism to ensure against a community not being left out. Inasmuch as this did not happen in Marin City, where both low-income and minority residents were left out with no notification of an Open House on July 8 at the Senior Center, there is a violation of Title VI. I noticed an 8 1/2 by 11 inches poster (only one hour before the meeting) at the Marin City Hub. This was another disappointment to me and others in our community. Our shuttle service is inadequate for serving our community because of the hilly terrain.

Staff response: Given concern about the adequacy of the notification process for Marin City residents, the public comment period was extended by two weeks, additional communications were sent out, notices were posted at all bus stops in that community, and leaflets were handed out to bus riders advising that an additional public outreach meeting was scheduled in Marin City. The proposed policies are specific to regional bus and ferry services operated by the Golden Gate Bridge Highway and Transportation District. Shuttle and other fixed route and demand responsive service operated by Marin Transit and policies related to those services are the responsibility of Marin Transit.

3. **Comment:** I'm glad that you're having an additional comment period for Marin City, but in the future it's important that more advertising and outreach is implemented. Many residents were unaware about the meeting and the comment period.

Staff response: See response to Comment #2. Future outreach efforts in Marin City will include more extensive communication efforts.

4. **Comment:** It appears the proposals brought to the hearing are all about raising fares and arguing about whether or not the District can raise some and not others without discrimination. The point should be THERE SHOULD BE NO FARE INCREASES, BUT FARE DECREASES.

Staff response: The proposed policies provide a framework to evaluate future potential service and fare changes. No fare changes are proposed at this time.

5. **Comment:** The District's Allocation of resources between bus and ferry services needs to be re-evaluated in view of Title VI. There is a disproportionate amount of resources going to wealthy ferry riders and not to low-income bus riders.

Response: Duly noted. The proposed policies do not address specific to the District's allocation of transit resources between modes. The District plans to analyze the demographic characteristics of its ferry and regional bus riderships.

6. **Comment:** The job of the Golden Gate Transit District is to provide public transportation, in order to reduce automobile traffic and provide a reasonable-cost alternative to driving. The job of the District is transportation, NOT social justice, affirmative action or welfare. All this would do is raise the cost of transportation due to the additional resources needed to determine, implement and monitor these Title VI items. It is ridiculous to put the Transit District into this situation. The \$5,000 to conduct this initial public hearing will be pocket change to the cost of implementation. The bottom line is stick to your primary objective and tell the feds to make their own determinations that the Transit District is discriminatory, and make them prove it. Focus on serving the communities you service, while keeping costs down, and not on Washington D.C's social justice schemes.

Response: The proposed policies and overall compliance with Title VI is a condition of the District continuing to receive federal financial assistance for its public transportation programs.

7. **Comment:** I oppose any fare increases for the Golden Gate transit ferries, buses and bridge. The fares are exorbitant as they are now and are a huge burden on the average person's finances. This is supposed to be PUBLIC transportation, not ELITE transportation. It is only affordable to the rich.

Response: The proposed policies are not specific to any fare increase at this time. They will be used to evaluate future fare increase proposals.