



Agenda Item No. (4)

To: Transportation Committee/Committee of the Whole  
Meeting of October 27, 2022

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

Subject: **ADOPT TITLE VI EQUITY ANALYSIS FINDINGS RELATIVE TO ASSUMPTION OF ANGEL ISLAND FERRY SERVICE AND FARES, AND ADOPTING THE CURRENT SERVICE MODEL AND FARES ON A PERMANENT BASIS**

### **Recommendation**

The Transportation Committee recommends that the Board of Directors (Board) approve the following actions:

1. Adopt the findings of the attached Title VI equity analysis for assumption of the Angel Island ferry service; and,
2. Adopt the Angel Island ferry service and fares upon completion of the current service and fare pilots.

The equity analysis concludes that introduction of this new service does not have a disparate impact on minority riders; however, it does represent a disproportionate benefit to non-low-income riders under the Golden Gate Bridge, Highway and Transportation District's (District) Title VI Policies. Additionally, the fares on the Angel Island did not disparately impact minority riders but constitute a slight disproportionate impact to low-income riders on Golden Gate Ferry (GGF) service.

This matter will be presented to the Board of Directors at its October 28, 2022, meeting for appropriate action.

### **Background**

In December 2020, Blue & Gold Fleet (Blue & Gold) notified the State of California Department of Parks and Recreation (State Parks) of its intent to end its contract for ferry service between San Francisco and Angel Island. Blue & Gold's application to be relieved of its obligation to provide this service is still pending with the California Public Utilities Commission.

In anticipation of Blue & Gold ceasing its Angel Island service, the Board of Directors voted on October 22, 2021 to establish a new Golden Gate Ferry route between San Francisco and Angel Island, to be initially implemented as a one-year demonstration project. The Board held a public hearing on the proposed San Francisco-Angel Island ferry service fares on November 5, 2021 and approved the fares on November 19, 2021.

Then in February 2022, in response to public comment received during the November 2021 public process for setting Angel Island fares, the Board approved new discounted Non-Profit/Educational Group Fares on Golden Gate Ferry that are applicable to its Angel Island service.

As part of this action, Staff proposes the Board approve the following one-way fares, which applied during the service and fare pilots:

Adult Limited Use Single Ride	\$14.00
Clipper Adult	\$9.00
Youth (aged 5-18)	\$7.00
Senior	\$7.00
Disabled/Medicare	\$7.00
Clipper START (Regional Low-Income Fare Pilot)	\$7.00
Children (aged 4 and under)	Free
Private Group Adult	\$9.00
Private Group Youth/Senior/Disabled	\$7.00
Non-Profit/Educational Group Adult	\$7.00
Non-Profit/Educational Group Youth/Senior/Disabled	\$4.50

Under the current Federal Transit Administration (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 (Title VI regulations and guidelines), transit agencies are not required to perform a Title VI service equity analysis unless a demonstration project lasts longer than one year and it otherwise qualifies as a major service change under the transit agency's major service change policy. The District's Major Service Change Policy defines 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.

Angel Island ferry service commenced on December 13, 2021 and may continue beyond one year, if the attached analysis is approved by the Board. Adding Angel Island ferry service constitutes a major service change under the District's Major Service Change Policy because this new service resulted in a 100% increase in the total vehicle revenue miles in service on a route. After operating the service for about eight months, Staff was able to gather rider demographic information through a survey, thereby enabling the District to conduct the requisite Title VI equity analysis for its new Angel Island ferry service.

The Title VI equity analysis, attached as Appendix A, conforms to the requirements of the Title VI regulations and guidelines and the District's Title VI Policies, including analyzing demographic

data to demonstrate how the service would address the transportation needs of disadvantaged communities.

### **Title VI Findings**

The assumption of Angel Island ferry service from Blue & Gold does not constitute a disparate impact on minority riders. It does, however, present sufficiently less benefit to low-income riders, compared to non-low-income riders, to be considered a disproportionate burden under the District's Title VI Policies.

Despite providing a disproportionately lesser benefit to low-income riders, the Angel Island ferry service represents an important means of access to a national historic landmark in the Bay Area and the largest natural island in San Francisco Bay. Home to a former U.S. Immigration Station that processed immigrants from all over the world, and predominantly immigrants from China and other Asian countries during the early 20<sup>th</sup> century, the state park now provides guided tours of the facilities. Angel Island is also a popular locale for hiking, boating, and recreation. Providing public ferry service allows visitors from all over the Bay Area and beyond to conveniently access this beautiful and important historic site.

The fares on the Angel Island service do not disparately impact minority riders but constitute a slight disproportionate impact to low-income riders on Golden Gate Ferry (GGF) service.

### **Fiscal Impact**

There is no fiscal impact associated with adoption of the findings of this Title VI equity analysis. There also is no anticipated fiscal impact associated with making the piloted Angel Island ferry service fare structure permanent.

Attachment: Appendix A – Title VI Equity Analysis

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**Appendix A**  
**Title VI Equity Analysis: Assume Operation of Angel Island Ferry Service**

**Presented to the Golden Gate Bridge, Highway and Transportation District**  
**Transportation Committee of the Board of Directors**  
**October 27, 2022**

**I. Background**

In December 2020, Blue & Gold Fleet (Blue & Gold) notified the State of California Department of Parks and Recreation (State Parks) of its intent to end its contract for ferry service between San Francisco and Angel Island. Blue & Gold's application with the California Public Utilities Commission to be relieved of its obligation to provide this service is still pending.

In anticipation of Blue & Gold ceasing its Angel Island service, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) voted on October 22, 2021 to establish a new Golden Gate Ferry route between San Francisco and Angel Island, to be initially implemented as a one-year demonstration project. The Board held a public hearing on fares for the proposed San Francisco-Angel Island ferry service on November 5, 2021 and approved the fares on November 19, 2021.

Then in February 2022, in response to public comment received during the November 2021 public process for setting Angel Island fares, the Board approved new discounted Non-Profit/Educational Group Fares on Golden Gate Ferry that are applicable to its Angel Island service.

Under the current Federal Transit Administration (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 (Title VI guidelines), transit agencies are not required to perform a Title VI service equity analysis unless a demonstration project lasts longer than one year and it otherwise qualifies as a major service change under the transit agency's major service change policy.

One of the cornerstones of the Title VI equity analysis is to use demographic data to demonstrate how the service would address the transportation needs of disadvantaged communities. The required components of the Title VI equity analyses are set forth in the Title VI regulations and guidelines, and the District's Title VI Policies.

The demographic data regarding Angel Island ferry riders was collected in late August and early September 2022, as detailed below in Section V, under "Data Sources."

**II. Title VI Policies (Adopted August 2013)**

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 Major Service Change 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 on 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 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 on 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.

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

**III. Golden Gate Ferry Services**

The District’s Golden Gate Ferry (GGF) service currently includes six routes between Marin County and San Francisco: Sausalito, Larkspur, Tiburon, Angel Island, 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, weekday service consists of seven southbound trips, two of which operate during the morning commute period, and six northbound trips, two of which operate during the evening commute period. On weekends, five round trips operate between the hours of 10:30 a.m. and 7:45 p.m.
- 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, nine southbound trips and ten northbound trips are operated on weekdays between the hours of 6:30 a.m. and 8:30 p.m. Five round trips are operated on weekends, between the hours of 8:00 a.m. and 9:00 p.m.
- 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 seven round trips between the hours of 6:45 a.m. and 7:00 p.m. Weekend service was added on

January 31, 2022, which consists of three southbound and four northbound trips, between the hours of 9:15 a.m. and 5:30 p.m.

- Angel Island service was offered starting on December 13, 2021. There are a total of four round trips operated seven days a week, with half the service in the morning and half in the afternoon.
- Special Event Service to Oracle Park was suspended for most of the pandemic but now has resumed operations 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 and has not resumed.
- Special Event Services are not operated daily and are not part of the regular ferry network intended for providing regional mobility. In addition, Special Event Services are expected to pay for their own operating costs, making them different from regular ferry service. This means that ridership is closely monitored on these routes to ensure that fares collected cover the cost of operation. Therefore, reductions in Special Event services are not included in this analysis.

#### **IV. The Angel Island Ferry Service Change Proposal, Fare Proposal, and Public Outreach (2020-2022)**

The District performed the following outreach regarding GGF's assumption of Angel Island ferry service:

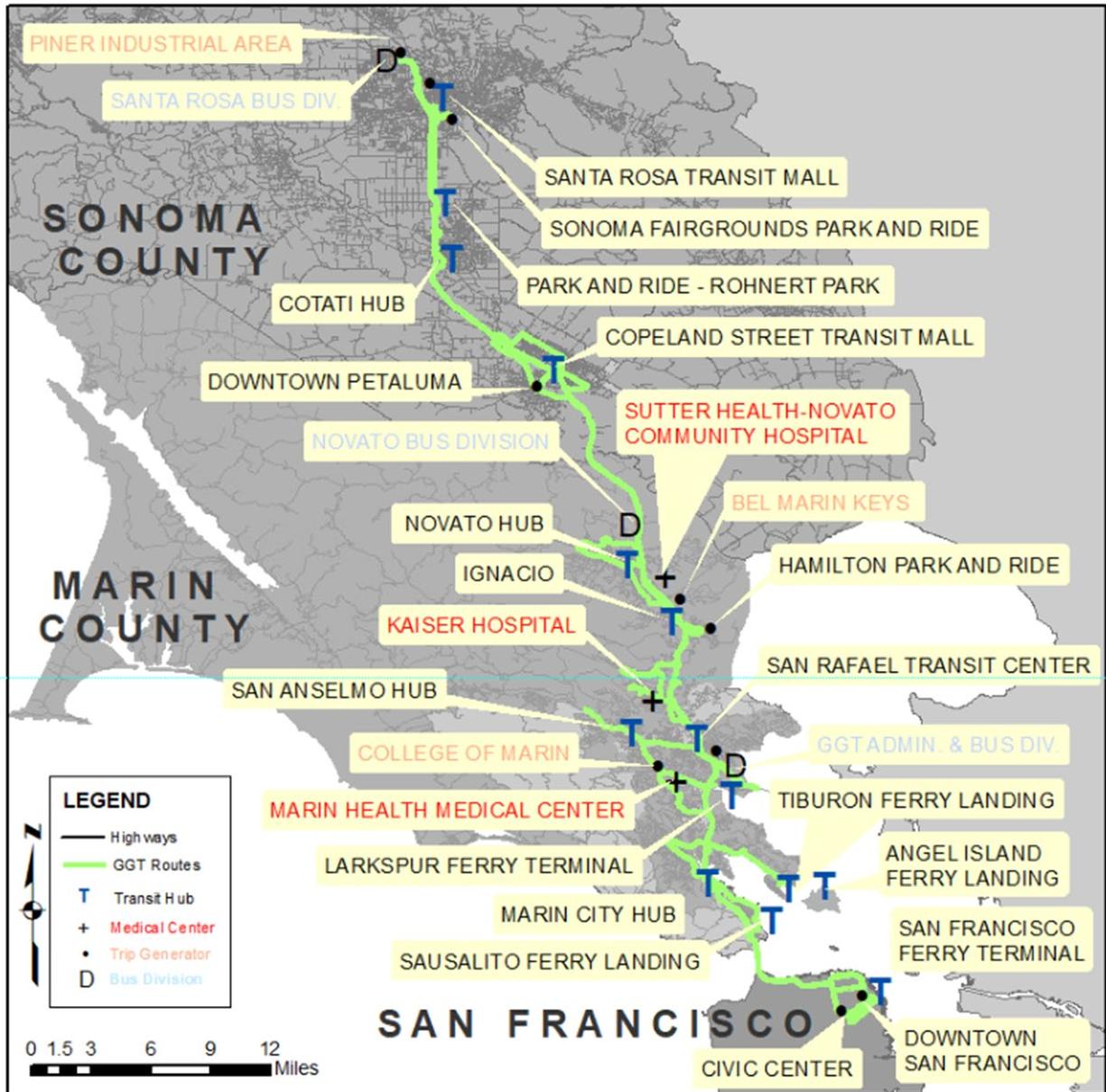
- Press release sent to local news media and stakeholders
- Article in the Marin Independent Journal
- Article in the Golden Gate Gazette newsletter
- Monthly e-blasts sent to customer database
- Promotion of service on social media (Facebook, Instagram, and Twitter)
- Signage posted on board ferry vessels and in terminals and on board buses

In addition, a public hearing was held on November 5, 2021 to receive comments on the proposed fares for the Angel Island ferry service. Then in February 2022, in response to public comment received during the public process for the proposed fares, the Board approved a Pilot Program for lower Non-Profit/Educational Group Fares on Golden Gate Ferry that are applicable to its Angel Island service.

Since the Angel Island service started, the District has received a handful of comments on Angel Island service related to general information requests, passenger and staff conduct, purchasing tickets, and the ferry route.

The following map shows the location of both GGF and Golden Gate Transit (GGT) services relative to major destination and boarding locations.

**Golden Gate Transit and Ferry Service Area Map**



***V. Title VI Service Equity Analysis for the Assumption of the Angel Island Ferry Service***

***Equity Analysis Methodology***

In accordance with the District's Title VI Policies, disparate impact is measured by comparing the percentage of minority riders on the GGF system as a whole to the percentage of minority riders on affected routes, and disproportionate burden is measured by comparing the percentage of low-income riders on the GGF system as a whole to the percentage of low-income riders on affected routes.

To analyze fare equity, the fare increase for minority and non-minority riders and low-income and non-low-income riders is compared. If the average fare increase for minority riders is more than 10% greater than the average fare increase for non-minority riders, there is a finding of disparate impact. If the average fare increase for low-income riders is more than 10% greater for low-income than for non-low-income riders, there is a finding of disproportionate burden.

### ***Data Sources***

With the exception of the Angel Island ferry service, all data on minority and low-income ridership 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 to conduct this study surveyed all of the District's services, including GGT and GGF. Data was collected on-board a sample of ferry trips. Questionnaires were produced in Spanish and English and included questions about the trip being taken and demographics.

Data for Angel Island ferry riders was collected in a survey that was conducted on August 27, 2022 and September 2, 2022. Only trips destined to Angel Island were sampled to avoid surveying the same passengers on their return trip. Passengers completed a single-page survey asking their race, household income range, method of payment (Clipper Card, Clipper Phone App, Limited Use Ticket, or Group Sales Invoice), fare category (Adult, Youth, Senior, Disabled, Clipper Start, General Group Fare, or Student Group Fare), and city of residence. 394 responses were collected and tabulated by District staff.

Because school group fares are an element of Angel Island ferry ridership, information was collected from the District's Customer Service department about school groups that purchased group fares during the time period in which the on-board surveys were conducted. School group fares were purchased for a total of four different schools on August 25, August 26, September 1, and September 3, and an analysis was performed based on census data of the area immediately surrounding the location of schools that purchased these fares. This data was compiled with the on-board survey data to provide a more complete picture of racial composition and household income of Angel Island ferry ridership.

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 GGF's 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 in 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 Clipper card reader data and on manual ferry log data. The data is kept in District databases and accessed by staff via District-created software.

**Methodology**

To determine whether commencement of the Angel Island service results 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 affected by each service change.
- ii. Calculate what percentage of all affected passengers are low-income and what percentage are minority. For purposes of this analysis, the GGF system as a whole includes the Larkspur, Sausalito, Tiburon, and Angel Island routes.
- iii. Compare the percentage of low-income and minority passengers on the affected routes to the percentage of low-income and minority passengers for the GGF system as a whole.

**Disproportionate Burden Analysis and Findings**

**Table 1: Disproportionate Burden Analysis**

	Daily Ridership 1/2022-8/2022	Low-Income	Non-Low-Income	Refused to answer	Est. Low-Income Ridership	Est. Non-Low-Income Ridership
Angel Island	313	10.19%	86.59%	3.22%	32	271
GGF System	2496	46.05%	40.60%	13.35%	1149	1013

Table 1 shows the percentages of low-income and non-low-income riders on the Angel Island ferry when multiplied with the average daily ridership for the period from January 1 through August 31, 2022, giving an estimated low-income and non-low-income ridership number. 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) based on the cumulative impact of the service changes. Using the cut-off of **\$75,000** to define “low-income,” the percentage of low-income ferry riders on the Angel Island route (10.19%) is 35.86% lower than the percentage of low-income ferry riders on the GGF system as a whole (46.05%). Therefore, the addition of the Angel Island ferry service provides a disproportionately lesser benefit to low-income riders.

***Disparate Impact Analysis and Findings***

**Table 2: Disparate Impact Analysis**

	Daily Ridership 1/2022-8/2022	Minority	Non-Minority	Refused to answer	Est. Minority Ridership	Est. Non-Minority Ridership
Angel Island	313	51.34%	47.79%	0.60%	161	150
GGF System	2496	31.73%	68.10%	0.10%	792	1700

Table 2 shows the percentages of minority and non-minority riders on the Angel Island ferry, multiplied times the average daily ridership, giving an estimated minority and non-minority ridership number. Minority riders make up 51.34% of Angel Island ferry riders, compared to 31.73% on GGF system as a whole. Since the proportion of minority riders on Angel Island ferry is higher than that on GGF system as a whole, adding Angel Island service provides a greater positive impact on minority riders compared to non-minority riders. Therefore, there is no disparate impact on minority riders.

**VI. Title VI Fare Equity Analysis for the Angel Island Ferry Service Fares**

The GGF Angel Island service fares differ from the fares charged by the previous operator, Blue & Gold. Accordingly, the District determined it would be to conduct a Title VI fare equity Analysis on whether the different fares 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 one-way fares that applied during service and fare pilots, and studied via this equity analysis are:

Adult Limited Use Single Ride	\$14.00
Clipper Adult	\$9.00
Youth (aged 5-18)	\$7.00
Senior	\$7.00
Disabled/Medicare	\$7.00
Clipper START (Regional Low-Income Fare Pilot)	\$7.00
Children (aged 4 and under)	Free
Private Group Adult	\$9.00
Private Group Youth/Senior/Disabled	\$7.00
Non-Profit/Educational Group Adult	\$7.00
Non-Profit/Educational Group Youth/Senior/Disabled	\$4.50

### ***A. Equity Analysis Methodology***

To analyze the equity implications of the multiple fare changes for Angel Island ferry service, all fare payment media and fare types were examined for the level of use by low-income and minority patrons. The media and fare types examined were:

#### Fares Types

- Adult Cash fare
- Adult Clipper fare
- Senior/Youth/Disabled fare; Clipper Start fare (Discount fare)

#### Fare Media Types

- Adult Limited Use Single Ride fare (LU fare)
- Clipper (includes Clipper telephone app fares)
- Private group fare
- Adult Non-Profit/Educational Group fare
- Youth Non-Profit/Educational Group fare

It should be noted that these fare categories vary slightly from the questionnaire, because a distinction had to be made between student group fares for adults and youths when performing the analysis. Clipper Discount fares were not analyzed separately, because Clipper Discount and cash fares are the same. Clipper Start fares are also the same as the other discount fares, but no Clipper Start fares were recorded on this survey. It is important to note that this effort did not incorporate Private Group Fares, which are charged differently from School Group Fares. General Group Fares were analyzed with other fare media in the on-board survey.

Based on FTA Title VI guidelines, for proposed changes that increase or decrease fares by payment type or fare media, the District should analyze any available information generated from ridership surveys that indicates whether minority and/or low-income passengers are disproportionately more likely to use the payment types or fare media subject to the proposed change. The methodology developed to analyze the impact of setting the Angel Island service fares at a different level than other GGF fares on minority (compared to non-minority) populations and low-income (compared to non-low income) populations included the following steps:

1. Defining the term low-income as those with an annual household income at or below 90% of the median for the service area. As addressed above, for analysis of GGT service in Marin, staff uses the median for Marin County, making the threshold \$75,000.
2. Defining the term “minority” to mean those who self-identified as any ethnicity other than “white” alone in the 2018 Golden Gate Transit and Ferry On-Board Survey, and on the on-board Angel Island survey.
3. Using data collected internally on school groups riding the ferry, consult census data to identify the proportion of minority residents in the zip codes of the schools that the rider groups came from.
4. Using data from the 2018 Golden Gate Transit and Golden Gate Ferry On-Board Survey (a survey conducted as part of the MTC Regional Survey), the on-board Angel Island ferry survey, and the census data, along with current and proposed

fares, to determine whether the proposed fare differences will have a disparate impact or disproportionate burden on minority or low-income populations, respectively, based on the District's Title VI policies.

***Data used for the analysis: 2018 Golden Gate Transit and Golden Gate Ferry On-Board Survey, the On-board Angel Island Survey, and Data from the U.S. Census***

In late 2017, MTC hired consultant ETC Institute to perform an on-board passenger survey of the District's fixed-route bus and ferry services. The survey was designed to compile accurate trip information to support MTC's travel model and the District's Title VI obligations by providing both demographic and travel data. The survey collected information including traditional demographics, languages spoken, fare media used as well as information about the passenger's trip. The survey was conducted on board buses and ferries in April, May, and early June of 2018. ETC Institute has provided District staff with a complete summary report as well as underlying data collected as part of the survey.

Because GGF was not yet operating the Angel Island service at the time of the 2018 survey, staff lacked demographic data on Angel Island riders. To supply that data, staff conducted an on-board survey of all Angel Island trips from San Francisco to Angel Island on one Saturday, August 27, 2022 and on Friday, September 2, 2022. 394 survey responses were collected, representing a solid sampling of riders.

Because students are not expected to know their household income, a different approach was taken to understand the demographic composition of this important subset of Angel Island ridership. Data was collected by Customer Service staff from four student group trips that took place close to the dates of the on-board survey, on August 25, August 26, September 1, and September 3. This data is collected as part of the process of selling group fares. Staff analyzed the racial and ethnic composition and median income of the zip code where the subject schools were located, and determined the proportion of minority/non-minority populations for each group, as well as the median income for each rider in each group. Race/ethnicity and income data was from the American Community Survey Census for the period of 2016-2020, based on the individual's zip code. This data was then merged with the on-board Angel Island survey data to create an overall picture of the racial composition and income level of Angel Island ridership.

***B. Fare Equity Analysis Findings***

Staff analyzed the impacts of the proposed fare increase associated with GGF taking over the Angel Island service in the context of all regular ferry service, including Sausalito, Larkspur, and Tiburon service fares. Special Event Service to Oracle or Chase Center fares were not analyzed because those fares are self-supporting and are therefore not comparable.

As GGF has a somewhat complex fare structure with four different routes and several different fare categories and fare media on each, a relatively complex analysis was required. Fares vary based on three characteristics:

1. The route;
2. The fare category (Adult Cash, Adult Clipper, and Discount fares);
3. The fare media (Limited Use Single Ride fares (LU fares); Clipper and Clipper phone app; Private group fares; and adult and youth school group fares). Transfers are also included where applicable, though there are no current transfer agreements in the case of the Angel Island ferry.

Adult category passengers receive a discount when using the Clipper card, so Adult Clipper and Adult LU fares are different. 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 LU fare, so all discount fares are analyzed as one group.

First, using data from the 2018 Golden Gate Transit and Ferry On-Board Survey, the on-board Angel Island survey, and the census data, staff compared percentages of low-income to non-low-income riders and of minority riders to non-minority riders by fare media and fare payment category.

**Table 3: Fare Payment Type Usage, GGF Overall**

Payment Type	Low-Income	Non-Low-Income	Minority	Non-Minority
Cash Adult	3%	7%	4%	7%
Discount	4%	7%	3%	9%
Clipper Adult	13%	53%	12%	52%
Private Group	0%	1%	1%	1%
School Group Adult	0%	1%	1%	1%
School Group Youth	0%	10%	5%	5%

**Table 3: Fare Payment Type Usage, Angel Island Ferry**

Payment Type	Low-Income	Non-Low-Income	Minority	Non-Minority
Cash Adult	3%	10%	7%	7%
Discount	3%	4%	4%	5%
Clipper Adult	4%	23%	10%	9%
Private Group	1%	5%	4%	2%
School Group Adult	0%	6%	4%	3%
School Group Youth	0%	42%	23%	22%

As can be seen in the above tables, “Clipper Adult” is a more preponderant payment method in all four categories of riders on ferry overall than on Angel Island service. On the other hand “School Group Youth” is a much higher proportion of payments among non-low-income riders on Angel Island than it is on ferry overall. It also is the highest proportion of fare payment among both minority and non-minority riders. “Cash adult” represents a relatively low proportion of payment method on ferry in general and on Angel Island service specifically, with the highest proportion of users on Angel Island service being in the non-low-income category.

Next, staff estimated the increase or decrease in fares by payment type, based on the four categories of low-income, non-low-income, minority, and non-minority riders on Angel Island service. This was done by multiplying the number of passengers surveyed, separated by category, by the change in fare by payment method (whether by increase or decrease). This is reflected in Table 4 below.

**Table 4: Fare Change by Payment Type and Passenger Category**

Payment Type	Low-Income	Non-Low-Income	Minority	Non-Minority	Total
Cash Adult	\$80.75	\$297.50	\$195.90	\$208.25	\$378.25
Discount	\$23.00	\$32.00	\$29	\$31	\$55.00
Clipper Adult	(\$97.50)	(\$536.25)	(\$221.25)	(\$195.00)	(\$633.75)
Private Group	(\$3.00)	(\$26.26)	(\$19)	(\$12.00)	(\$29.26)
School Group Adult	\$0.00	(\$121.00)	(\$72)	(\$50)	(\$121.00)
School Group Youth	\$0.00	(\$300.00)	(\$153)	(\$147)	(\$300.00)
Grand Total	\$3.25	(\$654.01)	(\$239.60)	(\$164.25)	(\$650.76)

**Table 5: Fare Change by Payment Type and Passenger Category (Percent)**

Payment Type	Low-Income	Non-Low-Income	Minority	Non-Minority	Total
Cash Adult	-12.41%	-45.72%	-48.51%	-51.57%	-58.12%
Discount	-3.53%	-4.92%	-7.18%	-7.68%	-8.45%
Clipper Adult	14.98%	82.40%	54.79%	48.29%	97.39%
Private Group	0.46%	4.04%	4.64%	2.97%	4.50%
School Group Adult	0.00%	18.59%	17.70%	12.26%	18.59%
School Group Youth	0.00%	46.10%	37.89%	36.40%	46.10%
Overall by Category	-0.50%	100.50%	59.33%	40.67%	100.00%

In Table 5, the amounts in parentheses indicate a decrease in fare amounts. Whereas those paying cash adult and any kind of discount fare paid more with the new Angel Island fares, those paying Clipper Adult fares and all kinds of group fares paid less.

It should be noted that in Table 6, because the fare increase or decrease is being divided by a negative number (the grand total of -\$650.76), the negative percentages indicate a fare increase and the positive percentages indicate a fare decrease. Though low-income riders experienced an increase in adult cash fares and discount fares, they also experienced a decrease in Clipper Adult fares, they experienced an overall half percent increase in fares. Minority riders also experienced an increase in Cash Adult and Discount fares, but overall they received 59% of the benefits of lowered fares compared to 41% for non-minority riders.

**Table 6: Summary of Fare Impacts**

	Low-Income	Non-Low Income	Minority	Non-Minority
Percentage of ridership	10.19%	86.59%	51.34%	47.79%
Percentage of fare impact	-0.50%	100.50%	59.33%	40.67%
Difference	10.69%	-13.91%	-7.99%	7.12%

The analysis showed that minority riders overall received a benefit from the new Angel Island fares. Minority passengers constitute 25.49% of ferry ridership overall and 51.34% of Angel Island ridership. Minority riders received 59.33% of the benefit from the new fares. Low-income riders represent 20.64% of overall ferry riders and 10.19% of Angel Island ridership. Low-income riders received a slight overall fare increase based on the new fares which represents a half a percentage point greater than their representation in the ridership. This constitutes a small disproportionate burden. In the first case, minority riders disparately benefit from the fare decision made by the District, while low-income riders are slightly more disadvantaged than would be expected by their representation among the ridership. Therefore, staff concluded that there was not a disparate impact but a small disproportionate burden created by this fare change.

***Conclusion***

The assumption of Angel Island ferry service (e.g., the major service change resulting from introducing a new service) does not constitute a disparate impact on minority riders, as they are using the service at disproportionately higher rates. It does, however, represent a disproportionate benefit to non-low-income riders under the District's Title VI Policies, as these riders are using the service at disproportionately lower rates.

Despite the disproportionate benefit to low-income riders, the District has determined that continuing to provide the service serves greater equity goals as the Angel Island ferry service represents an important means of access to a major historical site in the Bay Area, with particular relevance for disenfranchised populations, because the site was home to the former immigration station that processed immigrants from all over the world, and predominantly immigrants from China and other Asian countries during the early 20th century. Information and documentation on the station's history is provided on-site by the State Park Service and the Angel Island Immigration Station Foundation. Visitors come from all over the Bay Area and beyond to view this very important historical site, and the San Francisco to Angel Island ferry service provides them with the most convenient way to access this site from San Francisco.

Lastly, the adjusted fares on the Angel Island service constitute a slight disproportionate burden to low-income riders but do not disparately impact minority riders on GGF service.

**ATTACHMENT:**

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

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

**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,

**RESOLUTION NO. 2013-078**  
**BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013**  
**PAGE 2**

**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](mailto: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.

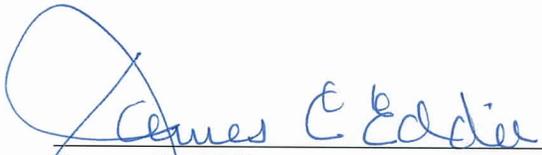
**RESOLUTION NO. 2013-078**  
**BOARD OF DIRECTORS MEETING OF AUGUST 9, 2013**  
**PAGE 3**

**ADOPTED** this 9<sup>th</sup> 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.