

Appendix I: Results of Service and Fare Equity Analyses

**Title VI Fare Equity Analysis of Proposed Changes to
Fare and Program Eligibility for
Marin Access Paratransit and Mobility Management Programs
and Marin Transit Fixed Route Pass Programs
for July 1, 2020**

**Marin Transit
February 3, 2020**

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Executive Summary

At its February 3, 2020 meeting, the Marin Transit Board of Directors will consider a package of proposed changes to Marin Access Paratransit and Mobility Management Program fares, Marin Access Low Income Fare Assistance, and Marin Transit's fixed route pass programs. The proposal is provided as Appendix A to this report. Marin Transit has conducted a Title VI Fare Equity Analysis of the proposed July 2020 fare changes. This equity analysis evaluates the impacts of the proposed changes and mitigations as a package and applies the District's adopted policies for disparate impact and disproportionate burden.

This report describes the public participation components that led to the fare proposal and those conducted during the public review process as essential to understanding the concerns and priorities of riders. Public input is integral to developing the final staff recommendation and will inform the District's next phase of outreach to explain how the approved changes will alter fare payment, low-income fare assistance programs, and pricing and availability of fixed-route passes.

This equity analysis demonstrates that the overall package of proposed Marin Access fare and fare assistance program changes will not result in a disparate impact or disproportionate burden for minority or low-income clients. The equity analysis of Marin Transit's proposed changes to its fixed route pass programs will substantially benefit Marin Transit's older adult, disabled, minority, and low-income riders. Staff evaluated the relative benefits of the monthly pass price reductions and applied Marin Transit's thresholds for identifying disparate impact and disproportionate burden. The distribution of benefits does not meet the District's thresholds based on data from the 2017 on-board passenger survey.

Background

Marin Transit explored changes to its fare policies in the 2016 and 2018 Short Range Transit Plans (SRTP), and recommended changes to the Marin Access fares and eligibility thresholds in the 2016 Marin Access Strategic Analysis and Recommendations Study. Appendix B of the 2018 SRTP provided guidance on a potential fare change to meet District goals.

For the proposed 2020-2029 SRTP, staff performed a comprehensive assessment of fare policies across all programs and evaluated eligibility standards for Marin Access programs. The goals that guided the development of recommended changes were to:

- Simplify Marin Access program eligibility;
- Encourage use of pass and Clipper electronic fare media over cash payment to streamline and improve operations;
- Offer fare media that incentivizes ridership and simplifies payment;
- Keep fares and subsidy levels commensurate with the services offered across programs;

- Adjust fare assistance programs to maximize social equity and provide mobility options for all Marin residents;
- Maintain cost-effectiveness targets by service typology; and
- Keep Marin Transit fare policies consistent with regional efforts to coordinate and integrate transit agencies fares.

Staff weighed the recommended changes and guidelines to ensure they are consistent with regional goals and facilitate transfers with partner transit agencies. Staff conducted a survey of Marin Access riders in 2017 and 2018 and prepared a detailed data analysis to develop the recommended fare change proposal. The comprehensive review evaluated these three areas in combination:

1. Low-income fare assistance (LIFA) for older adults and persons with disabilities;
2. Program eligibility for demand response programs; and
3. Fare policies for mobility management programs, paratransit, and fixed-route services.

The changing structure of the regional Clipper electronic fare payment program also influenced the recommendations. Marin Transit cannot independently change its fares within the Clipper system as it shares its fare table in Clipper with Golden Gate Transit. All changes to local fares must be agreed upon by both Marin Transit and Golden Gate Transit until Marin Transit is provided independence under Clipper. Based on these factors, staff updated the proposed changes as an important next step in implementing new programs and advanced technologies.

In July 2019, staff provided the Marin Transit Board with an overview of the District’s fares and fare policies. At the September and November 2019 meetings, staff summarized current fares and eligibility standards and presented formal recommendations to change fare and eligibility policies. Based on Board feedback, staff updated the draft Proposal on Fare Policy, Program Eligibility, and Low-Income Fare Assistance. The full proposal is included as Appendix B of this report. It summarizes key considerations that guided the proposed changes to the District fares and program eligibility policies.

Title VI Requirements

Title VI of the Civil Rights Act of 1964, Section 601 states: “No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Marin Transit seeks to avoid, minimize or mitigate disproportionately high and adverse impacts on minority and low-income populations. As a recipient of financial assistance from the Federal Transit Administration (FTA), Marin Transit is required to comply with Title VI of the Civil Rights Act of 1964 by evaluating service and fare changes at the planning and programming stages to determine whether those changes have discriminatory impacts, including Disparate Impacts on minority populations and/or Disproportionate Burdens on low-income populations.

In 2012, FTA issued guidance under FTA Circular 4702.1B (Title VI Requirements and Guidelines for

Federal Transit Administration Recipients) and Circular 4703.1 (Environmental Justice Policy Guidance for Federal Transit Administration Recipients) requiring transit agencies to develop policies when they contemplate service or fare changes. Despite being an FTA requirement, a Title VI Equity Analysis does not replace the responsibility for conducting an ongoing process that considers equity among other factors when designing fare changes, service changes, or discretionary policies and programs.

Marin Transit's Title VI Program

Marin County has approximately 250,000 residents, and they are located primarily along the U.S. Highway 101 corridor stretching to Sonoma in the north and San Francisco to the south. Most of Marin County consists of protected open space; national, state, and local parks; and agricultural preservation areas in South and West Marin. Marin Transit carries 3.5 million local transit and paratransit trips each year. Based on a 2017 Marin Transit fixed route passenger survey, approximately 59 percent of local riders are low-income and approximately 71 percent identify as minority or other. Over half of the survey respondents identified as Hispanic (52%).

Table 1 below updates demographic analysis in the District's Title VI Program table with the results of the 2017 On-board Ridership Surveys and 2017 American Community Survey (ACS) data. Consistent with FTA's Title VI guidance, minority population is defined as all persons who self-identify as not white in the US Census and persons who identify as Latino or Hispanic regardless of race. As applied in Marin Transit's 2017 Title VI Program, low-income is defined as households earning less than \$50,000 annually. The countywide average proportion of minorities residing in Marin County is 28 percent. In all cases, Marin Transit routes serve predominantly minority and low-income residents based on passenger survey results and ridership statistics. Marin Transit conducted its most recent onboard passenger survey in 2017, and the most recent survey of Marin Access paratransit and mobility management program clients was conducted in 2018.

The 2017 Board-adopted Title VI Program sets procedures that the District must follow regarding fare and major service change proposals. As defined under the program, major service and fare changes are subjected to an equity analysis to identify disparate and disproportionate impacts. Marin Transit fare change proposals are developed based on a long process of research, survey, and public participation. Before Board approval of any fare change, the District provides a meaningful opportunity for riders and the general public to discuss possible impacts and comment on any proposed mitigation measures. This includes discussion of less discriminatory alternatives that may be available, in advance of any action on the proposals that the Board of Directors may approve.

To comply with the 2012 FTA Title VI guidance, the Marin Transit Board adopted Policies on Major Service Change, Disparate Impact, and Disproportionate Burden for evaluating service and fare changes on June 24, 2013. These three policies established a definition of what constitutes a major service change to require an equity analysis and a statistical threshold to determine whether minority and low-income riders are disproportionately impacted by a service or fare change. These are provided as Appendix A with a description of the public outreach efforts associated with establishing these policies.

Table 1: Demographic Overview of Transit Riders in Marin County

	Transit Rider (Onboard Survey Results)				Marin County % ⁽¹⁾
	2005	2008	2012	2017 ⁽²⁾	
Age					
Persons under 18 years old	18%	25%	21%	11%	20%
Persons between 18 and 65 years	78%	70%	72%	80%	60%
Persons 65 years old and older	4%	5%	7%	9%	20%
Gender					
Female	48%	46%	49%	44%	51%
Male	52%	54%	51%	56%	49%
Household Income					
Under \$25,000	51%	61%	57%	35%	12%
\$25,000 to \$49,999	28%	18%	20%	24%	13%
\$50,000 to \$74,999	10%	8%	7%	12%	12%
\$75,000 or more	10%	13%	16%	29%	63%
Race					
Hispanic	n/a	49%	43%	52%	16%
Caucasian/White	n/a	36%	39%	29%	72%
African American	n/a	9%	7%	7%	2%
Asian	n/a	8%	5%	5%	6%
Other	n/a	5%	6%	7%	4%

Notes: (1) U.S. Census Bureau, 2013-2017 American Community Survey

(2) The 2017 Marin Transit onboard survey did not include Supplemental school routes that were included in previous survey efforts.

Developing the Proposal to Change Marin Access Fare Policies and Program Eligibility and Marin Transit Fixed Route Passes

In 2016, Marin Transit completed an extensive two-year study of its suite of Marin Access programs, including paratransit, the *Marin Access Strategic Analysis and Recommendations Study*. Ten recommendations emerged from this review of programs, rider characteristics, and an analysis of existing and future market conditions. Marin Transit staff worked collaboratively with stakeholders to develop an Action and Implementation Plan guided by these recommendations. The primary stakeholder groups include the Marin County Paratransit Coordinating Council and the Marin Mobility Consortium, which consists of representatives of community and social service organizations, advocates, and riders. Two recommendations from the Study specifically relate to the changes considered in this proposal.

The first Marin Access Study recommendation:

- **Reevaluate fare policies to optimize public subsidy, achieve sustainable programs, ensure fares are equitable (maintains a safety net for low-income), and create pricing that manages consumer demand for services.**

“Fares and fare policies across the Marin Access programs are inconsistent, especially between paratransit and Catch-A-Ride. Paratransit requires a base fare while Catch-A-Ride only requires payment if a trip exceeds a specific length. This structure makes the more convenient program cheaper than the shared ride service for shorter trips.

Changes to Marin Access fare policy could increase revenues, encourage ridership during certain times, and improve fare equity among users. Analysis is needed to consider the effects of any potential changes, particularly on low-income riders and those ‘in the gap,’ living above the Federal Poverty Level but below the Elder Index, and to gauge the response of current and future ridership. Fare policies should be evaluated in tandem with any changes to program eligibility thresholds. Action Items might include: Conduct a Fare Policy SWOT [strengths, weaknesses, opportunities, and threats] analysis, perform customer research, and evaluate alternatives; Reassess fixed route fares for Marin Access users to encourage usage for these services and shift demand during peak hours.”

The second Marin Access Study recommendation:

- **Reassess eligibility thresholds to achieve consistency and equity across all Marin Access and Marin Transit programs.**

“Eligibility for nearly all Marin Access programs differs and creates confusion for the user and inconsistency across the services. Many Marin Access clients also rely on auxiliary services, not operated by Marin Transit, that are subject to their own requirements and eligibility thresholds. Establishing a consistent and clear eligibility process for all Marin Access program is an important step in improving the user experience and ensuring programs are easy to understand and use. Changes to Marin Access

eligibility thresholds need to be considered jointly with potential fare policy changes and developed with an understanding of eligibility requirements established by other service providers in the county and the Bay Area. Action Items might include: Standardize eligibility across Marin Access and Marin Transit services and programs; Develop recommendations for a system-wide low-income fare policy.”

Marin Transit Fare Policies and the Short Range Transit Plan

Marin Transit updates its Short Range Transit Plan (SRTP) every two years. The SRTP is a fiscally constrained five-year blueprint with a ten-year financial outlook. The SRTP is informed by completed and ongoing planning efforts, including the 2016 Marin Access Study and related actions. The Marin Access and Marin Transit fare policy and program proposals build on the principles and priorities of the SRTP and extensive public participation opportunities. These include community-based transportation plans for Marin City in Southern Marin and for the Canal neighborhood in San Rafael and ongoing public participation activities. The 2016, 2018, and 2020 plans reflect the goals and guiding principles for proposed changes to fare policies and programs. Appendix B of this report is from the current draft SRTP proposed for adoption at the Marin Transit Board meeting on February 3, 2020.

Public Participation Before and After the Public Comment Period

Following US Department of Transportation planning regulations, Marin Transit developed a documented public participation plan to provide adequate notice of public participation activities and early and continuous opportunities for public review and comment at key decision points. The federal statutory and regulatory framework creates a proactive program of engagement, interaction, and accountability for decision makers, interested parties, and the public. Fundamental to this program, the District seeks out and considers the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment, healthcare, and other services. The outreach plan in advance of the final recommendation to the Board is fully consistent with the District’s Title VI Program Public Participation Plan.

Marin Transit identified and remedied potential adverse effects based on public input and the established goals for improving the availability and incentives for Marin Access programs. The section discusses the public participation process for developing this proposal and identifying adverse effects.

In addition to workshops and feedback forms, staff participated in stakeholder meetings and events with community organizations and conducted surveys of Marin Access clients. At each event, staff described the proposed fare and eligibility changes in detail, answered questions, and requested input.

Appendix E to this report summarizes all stakeholder and community partner comments and indicates how staff used these comments to revise the draft proposal.

Marin Transit staff provided materials and made presentations to community groups and organizations that serve older adults, the disabled community, and the Spanish-speaking community. Staff provided a detailed Fact Sheet and *Frequently Asked Questions* that describe the proposed changes and information on how to provide input on the proposal. All materials were professionally translated into Spanish.

Notice of the proposed changes and the public hearing were posted inside each Marin Transit and Marin Access vehicle and at major transfer locations, including notice of how to obtain additional information. All notices were posted in English and Spanish.

Marin Transit met with community leaders in the San Rafael's largely Hispanic neighborhood in the Canal District to seek input on how to more effectively reach residents and riders and discuss how to provide information that will assist riders with understanding their fare payment options after the changes are implemented. The Canal Alliance developed and posted a five and a half minute video in Spanish on their Facebook page providing information about the proposal with an interview of Marin Transit staff to answer questions. This dialog will continue in advance of the changes, and staff is scheduled to participate in a neighborhood leadership council that meets regularly.

Marin Transit released a draft Fare Policy, Program Eligibility, and Low-Income Fare Assistance Proposal for public review and comment at the Board's November 18th meeting and requested that they open the formal public comment period and set a public hearing for January 13, 2020.

Public comments on the proposed changes were recorded at the community meetings and travel navigator workshops, transcribed from phone calls and comment cards, and documented from emails and online comment forms. The Marin Transit Board of Directors held the public hearing at its January 13, 2020 meeting where simultaneous professional translation was provided. Staff presented all comments received up until that time. All comments received prior to the public hearing, during the hearing, and up until January 29, 2020 are provided in **Appendix D** along with staff responses.

Options for public input on the draft proposal included an online comment form, mail, email, telephone and in-person. Staff provided notice of these opportunities in Spanish and English in the Marin Independent Journal, inside Marin Transit buses and at major bus stops, on the District's website, and through emails, social media, and community partner newsletters. The Marin Access Fare & Eligibility Policy Change Comment Form is provided as **Appendix H**.

As part of the targeted outreach to riders who may be impacted by this proposal, Marin Transit staff sent postcards via mail to all active Marin Access riders. Staff conducted a series of presentations at Marin Transit's Paratransit Coordinating Council and other community partner meetings, including the Marin Mobility Consortium and the Canal Alliance. Since November 2018, Marin Transit staff provided information and engaged Marin Access clients at scheduled satellite hours at the San Geronimo and San Rafael Community Center and at Pickleweed in the Canal neighborhood through December. Staff conducted additional satellite hours in January at the Corte Madera Community Center, Mill Valley Community Center, Margaret Todd Senior Center in Novato, and West Marin Senior Services at the Dance Palace in Point Reyes Station. These satellite hours are advertised on the District's website and promoted through community partners.

Adjustments to the Proposal Resulting from Public Outreach and Subsequent Analysis

Based on input from the Marin County Paratransit Coordinating Council, staff changed the recommended criteria for determining eligibility for the low-income fare assistance program. Originally, staff proposed using 200 percent of the federal poverty index. PCC members requested that Marin Transit utilize the Elder Economic Index as more suitable for Marin County and clients of Marin Access programs. The Elder Economic Index is based on annual household income depending on household size and ownership or renter status. For Marin County, a one-person household owner with no mortgage and an income of \$22,272 or less will be eligible for the Low-Income Fare Assistance Program or LIFA. The proposed use of the Elder Economic Index for LIFA is also consistent with the County of Marin's policy to increase its use of this Index in planning and program eligibility.

Marin Access Rider Surveys and Client Database as Data Sources

Marin Access rider surveys are administered annually via US Mail. To ensure at least a 20 percent response rate, Travel Navigators administer some surveys via phone. The surveys are sent to all active riders (i.e. those that have taken a trip on one of the Marin Access services within the past year). Data is from the 2017 and 2018 rider survey. Staff cleaned this data to remove duplicate responses and retain the most recent response. Respondents self-report their income, race/ethnicity, and whether they use a particular Marin Access service.

The Marin Access Travel Navigator Database (MA-TN) houses all applicant information reported at the time of application, with periodic updates to client records based on subsequent information received. Applicants self-report income, or income was inferred by eligibility for SSI and/or Marin Access Low Fare Assistance Program info. Race/ethnicity is not requested or reported at intake. Data used for the analysis is from the most recent backup of the MA-TN Database on January 21, 2020. There were 10,930 registered and 'active' clients in the database. Clients are marked inactive when staff learn that a client has moved or is deceased.

In the Marin Access 2017 and 2018 Rider Survey, respondents self-reported their use of paratransit, income, and race/ethnicity. The Rider Survey data does not differentiate ridership between mandated paratransit and paratransit trips beyond the mandated service area. Marin Access has referred to these as "paratransit, extended." The proposed fare changes eliminate this separate fare category. The 2018 Marin Access Rider Survey is provided as **Appendix G**.

Table 2: Marin Access Client Survey Participation (2017 and 2018)

	2017	2018
Total Surveys Mailed	1750	1996
Target Response Rate	Unknown	20%
Surveys Needed	-	399
Surveys Received	347	272
Completed by Phone	-	130
Actual Response Rate	20%	20%

For the Catch-A-Ride data, respondents self-reported their use of the service, income, and race/ethnicity.

Proposed Changes to Marin Access and General Purpose Dial-A-Ride Fares

Marin Access Paratransit and Catch-A-Ride Fare Changes Proposed in Two Phases

If approved by Marin Transit, the first phase will be effective July 1, 2020 on Marin Access Paratransit and Catch-A-Ride. Phase 2 would go into effect three years later on July 1, 2023.

Phase 1 proposes that fares for ADA-mandated and non-mandated paratransit trips will increase to \$3.00. Currently, ADA-mandated trips are priced the same as fixed route adult fares at \$2.00 per trip. Non-mandated paratransit trips are priced at \$2.50. Marin Transit adult fixed route and paratransit fares have been held constant since 2004. Going forward there will be no differentiation in fares for mandated and non-mandated paratransit.

The second phase will be effective July 2023 and is proposed to further increase the per trip paratransit fare from \$3.00 to \$4.00. The Catch-A-Ride program subsidies will also change in Phase 2. **Table 3** below provides the current and proposed fare and subsidy structure for Catch-A-Ride.

Table 3: Proposed Changes to Catch-A-Ride Subsidized Same-Day Taxi Service

Current Catch-A-Ride	Phase 1	Phase 2
Free up to \$14.00/\$18.00	\$4.00 + 100% of fare above \$18.00	\$5.00 + 100% of fare above \$19.00
Limit of 8 trips/month ⁽¹⁾	Limit of 10 trips/month	Limit of 10 trips/ month

Note: (1) Qualified low-income riders get an additional \$4.00 in subsidy per ride or free rides up to \$18.00.

The Catch-A-Ride is provided for ADA-eligible riders as a convenient same-day service alternative to paratransit and to older adults based on age requirements. At no charge to the rider, this service currently provides up to \$18 in distance-based service per trip for low-income riders and \$14 for those who are not low-income. In both cases, riders are limited to eight trips per month. The proposal alters the fare structure by adding a \$4.00 fare per trip with subsidy of \$14 per trip. Above \$18, the rider will pay 100 percent of the trip cost. At \$14, the subsidy per trip will remain the same as currently provided for those who are not low-income. The number of subsidized trips for each client will increase from eight to ten trips per month, a 25 percent increase.

In Phase 2, the base fare is proposed to rise from \$4.00 to \$5.00 beginning in July 1, 2023. The rider will pay 100 percent of the trip cost above \$19.

Proposed Changes to Dial-A-Ride Fares

The fares for the two rural Dial-A-Rides and the Novato Dial-A-Ride (DAR) are proposed to change on July 1, 2020. The Novato DAR offers an on-demand shuttle for travel within the City of Novato with curb to curb service. Currently, the Novato DAR per trip fares are the same as on Marin Transit’s fixed route services at \$2.00 for Adults and \$1.00 for Senior, Disabled, and Youth riders. Marin Transit is proposing to increase the fare on the Novato Dial-A-Ride to \$4.00 for Adults and \$2.00 for Senior, Disabled, and Youth riders.

The Dillon Beach/Tomales Dial-A-Ride operates one round trip per week on Wednesdays by reservation. It provides curb-to-curb pick-up and drop-off service between Dillon Beach, Tomales, and Petaluma in Sonoma County. The Point Reyes Dial-A-Ride operates two round trips per month on the first and third Mondays, by reservation. It offers curb-to-curb pick-up and drop-off service between Point Reyes Station and Novato.

The current fare for the two rural services is \$2.50 each way. For both rural Dial-A-Ride services, Marin Transit is proposing to raise the one-way fare to \$4.00 for Adults and to lower the fare for Senior, Disabled, and Youth riders to \$2.00.

Notes on Dial-A-Ride Ride Data

Dial-A-Ride ridership information is from the trip history for calendar years 2017 and 2018. Marin Transit does not collect income or race/ethnicity information from these riders. Date of birth is collected from riders that disclose this information at the time of trip scheduling or based on information Marin Transit has if the rider is eligible for Marin Access Paratransit. Dial-A-Ride and Marin Access Paratransit are both scheduled using TripSpark PASS. To determine data for use in the Fare Equity Analysis, staff combined trip history data with Marin Access Travel Navigator Database information to determine whether a rider reported minority and/or low-income status.

Title VI Fare Equity Analysis for Marin Access Program and Dial-A-Ride Fare Changes

Based on survey data, **Table 4** below indicates that the burden of the fare increase is shared equally among Marin Access riders. There is no difference between the impact to minority and low-income clients and those who are not. Based on Title VI guidance, there is no disparate impact or disproportionate burden.

Table 4: Marin Access Survey Data and Fare Equity Analysis for Phase 1 (July 1, 2020)

Marin Access Programs	Ridership Information (Numbers)				Fare Information				Average Fare Change				
	Minority	Non-minority	Low-income	Non low-income	Current fare	Proposed fare	Fare change %	Fare change absolute	Minority	Non-minority	Low-income	Non low-income	
Paratransit	86	369	317	53	\$2.00	\$3.00	50%	\$1.00	\$86.00	\$369.00	\$317.00	\$53.00	
Non-Mandated Paratransit					\$2.50	\$3.00	20%	\$0.50					
Catch-A-Ride subsidized taxi	49	241	190	47	Distance-based, variable fare	\$4.00		See Table 4					
Dial-a-Ride, Seniors	Unknown	Unknown	99	1	\$1.00	\$2.00	100%	\$1.00			\$99.00	\$1.00	
Dial-a-Ride, Adults	Unknown	Unknown	Unknown	Unknown	\$2.00	\$4.00	100%	\$2.00					
Dial-a-Ride, Rural	Unknown	Unknown	2	0	\$2.50	\$4.00	60%	\$1.50			\$2.00	\$0.00	
									Average	\$1.00	\$1.00	\$1.00	\$1.00
									Percent Increase	50%	50%	50%	50%

Marin Access Clients Able to Ride Marin Transit Fixed-Route Services

Table 5 provides data from two sources for Marin Access older adult and disabled clients who report that they ride Marin Transit fixed route services when they are able to do so. The rider survey and Travel Navigator database are consistent in finding that those riders are primarily low-income. Currently, Marin Transit’s monthly pass for senior /disabled passengers is \$25. Marin Transit is proposing to further lower the price of this monthly pass to \$20. As discussed in the Marin Low-Income Assistance Program section below, eligible low-income clients will receive a free Marin Transit Monthly Pass for access to all local Fixed Route services.

Table 5: Marin Access Survey, Clients Who Ride Fixed Route Services

Data Sources	Responded to Race / Ethnicity			Responded to Income		Non Low-Income
	Question	Minority	Non-Minority	Question	Low-Income	
(1) Marin Access Rider Survey	157	28	129	130	107	23
(2) Travel Navigator Database	N/A	Unknown	Unknown	135	127	8

- (1) Marin Access 2017 + 2018 Rider Survey. Self-reported use of fixed route, income, and race/ethnicity.
- (2) Travel Navigator Database through 1/22/2020. This houses all applicant information. Applicants self-report income or was inferred by eligibility for SSI or Marin Access LIFA. Race/ethnicity is not currently requested or reported at intake.

Mitigations for Marin Access Fare Changes

Program Eligibility

One of the recommendations from the 2016 Strategic Analysis Study was to make program eligibility consistent across Marin Access mobility programs. Paratransit eligibility will continue to follow ADA requirements. In all cases ADA-paratransit riders are eligible to ride the other programs. In terms of age, eligibility for Volunteer Driver Reimbursement Programs will increase from 60+ to 65+. There will be no impact on those who currently utilize these programs as they will remain eligible. Catch-A-Ride will be

open to all riders age 65+. The current and proposed program eligibility criteria are summarized below in **Table 6**.

Table 6: Current and Proposed Marin Access Program Eligibility Criteria

Demand Response Program	Current Eligibility Criteria	Proposed Eligibility Criteria	Applies to
Local Paratransit (mandated and extended)	Marin County resident or visitor and approved for ADA service based on ability-based evaluation	No Change	No Change
Volunteer Driver Reimbursement Programs (STAR & TRIP)	Marin County resident, age 60+ -or- ADA approved	Marin County Resident, age 65+ -or- ADA approved	<ul style="list-style-type: none"> ▪ Existing clients are grandfathered into programs ▪ New eligibility criteria apply to all new applicants
Catch A Ride	Marin County resident, age 80+, or 60-79 and no longer driving -or- ADA approved	Marin County Resident, age 65+ -or- ADA approved	No Change
Marin Transit Connect Dial-A-Ride	None (General Public Services)	No Change	No Change

Marin Access Low-Income Assistance Program Changes

Table 7 below summarizes the current eligibility and proposed changes for the Low-Income Assistance Program (LIFA) serving Marin Access clients. These changes are intended to provide consistency and to substantially offset the burden on low-income clients of the increase in paratransit fares. The eligibility requirements and financial assistance benefits for paratransit and Catch-A-Ride are combined and will rely on the Elder Economic Index or qualification for Medi-Cal.

New Financial Assistance for LIFA-eligible Marin Access Clients

Under the proposal, all LIFA eligible clients will receive a \$20.00 credit each month for use on all Demand Response programs. These include Paratransit, Catch-A-Ride, Marin Transit Connect, and the Dial-A-Rides serving Novato, Point Reyes, and Dillon Beach/Tomales. LIFA clients will also receive a free Marin Transit Monthly Pass to ride all local Fixed Route services.

Table 7: Low-Income Fare Assistance Programs Current and Proposed

	Paratransit	Catch A Ride	Proposed Low-Income Fare Assistance
Program Eligibility⁽¹⁾	Marin County resident or visitor and approved for ADA service based on ability-based evaluation	Marin County resident, age 80+, or 60-79 and no longer driving -or- ADA approved	Marin County Resident, age 65+ -or- ADA approved
LIFA Eligibility Threshold	SSI Eligibility ⁽²⁾	Income Tied to Elder Economic Index ⁽³⁾	Income tied to Elder Economic Index ⁽³⁾ or Medi-Cal Qualified
Financial Assistance	Ticket booklets valued at total of \$40 per quarter	Additional \$4 subsidy per ride (up to \$32 per month)	<ul style="list-style-type: none"> ▪ \$20.00 in credit each month for use on all Demand Response programs.(4) ▪ Monthly Pass for free access to Fixed Route.
Documentation Required to Demonstrate Eligibility	SSI Eligibility Letter	Self-Reported	<ul style="list-style-type: none"> ▪ Medi-Cal status can be confirmed with County of Marin ▪ Proof of age/address/ income required (documentation can include SSI letter, AGI from federal income tax forms, recent paystubs, Marin County General Assistance Letter, etc.)
Program Applicability	Paratransit Only	Catch-A-Ride Only	All Programs that require a fare
Process	Two 10-ticket/ride booklets mailed to participant on a quarterly basis by Travel Navigators	Additional subsidy applied at booking beyond CAR subsidy	Credit added into e-wallet account to scheduling software and applied at time of booking; Fixed Route monthly pass distribution TBD

Delivery	Paper, manual process	None - managed through Access database	None - managed through scheduling software
Eligibility Renewal	N/A	N/A	Annual

Table 7 Notes:

- (1) Recipients of LIFA must apply and be approved for one of the Marin Access programs including ADA paratransit, Volunteer Driver, or Catch-A-Ride.
- (2) The income limit for SSI is the federal benefit rate (FBR), which is \$771 per month/\$9,252 annually for an individual and \$1,157 per month/\$13,884 for a couple in 2019.
- (3) Based on annual household income: \$22,272 / 1-person household, Owner w/o Mortgage.
- (4) Demand Response programs include Paratransit, Catch-A-Ride, Connect, Novato Dial-A-Ride, and Point Reyes Dial-A-Ride and Dillon Beach Dial-A-Ride (in West Marin).

Proposed Changes to Marin Transit Fixed Route Pass Programs

Marin Transit has analyzed data on fixed route fare payment methods from its most recent on-board passenger survey in 2017. This is summarized in **Table 8**, below. Marin Transit used the survey data to identify the fare media usage distinguished by rider characteristics, i.e. minority and low-income.

Minority populations are those who identified themselves as American, Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latin, Native Hawaiian or Other Pacific Islander. Consistent with the Marin Transit 2017 Title VI Program, low-income is considered as households that earn less than \$50,000 annually.

The 2017 passenger survey data did not differentiate between Adult, Senior/Disabled and Youth Local Passes or 1-day, 7-day, or monthly categories.

Table 8: Survey Results for all Marin Transit Fare Payment Methods by Minority and Income Status, Actual Total Reported Methods

Fixed Route Passes (Day, 7-Day, or 31- Dday)	Ridership Information (Numbers)				
	Minority	Non-minority	Low-income (below \$50,000)	Non low- income (\$50,000 or more)	Total Surveys
Marin Local Pass, Adult	49	19	36	24	1,214
Marin Local Pass, Youth	4	2	2	1	
Marin Local Pass, Senior/Disabled	11	13	15	3	
Cash	529	182	464	124	
Clipper Electronic Card	113	82	127	42	
Regional Discount Card for Disabled Passengers	9	13	15	2	
College Pass	53	35	55	14	
Youth Pass	83	10	38	17	
Total	851	356	752	227	

Based on 1,214 surveys, **Table 9** shows the percentage of reported Pass program participants out of the total reported fare payment methods by minority and income status.

Table 9: Survey Results for all Marin Transit Pass Program Methods by Minority and Income Status, As a Proportion of Total Reported Methods

Fixed Route Passes (Day, 7-Day, or 31-Day) Combined	Ridership Information (%)				Total Surveys
	Minority	Non-minority	Low-income (below \$50,000)	Non low- income (\$50,000 or more)	
Marin Local Pass, Adult	5.8%	5.3%	4.8%	10.6%	1,214
Marin Local Pass, Youth	0.5%	0.6%	0.3%	0.4%	
Marin Local Pass, Senior/Disabled	1.3%	3.7%	2.0%	1.3%	

Title VI Equity Analysis of Changes to Marin Transit Pass Programs

Table 10 below estimates the proportion of minority and low-income riders who purchase Marin Transit Passes, by applying the proportions in the 2017 survey data and actual pass usage in fiscal year 2017. This provides context for evaluating the relative impacts of the proposed changes to Marin Transit Pass programs.

The District is proposing to cut the price of an Adult monthly pass from \$80 to \$40 and the monthly pass for Senior/Disabled passengers from \$25 to \$20. The Youth pass is proposed to be eliminated, as there is no demonstrated use. The 7-Day Pass program is proposed to be eliminated. This section analyzes these proposals and describes the FTA guidance for determining disparate impact on minority populations and disproportionate impact on low-income populations.

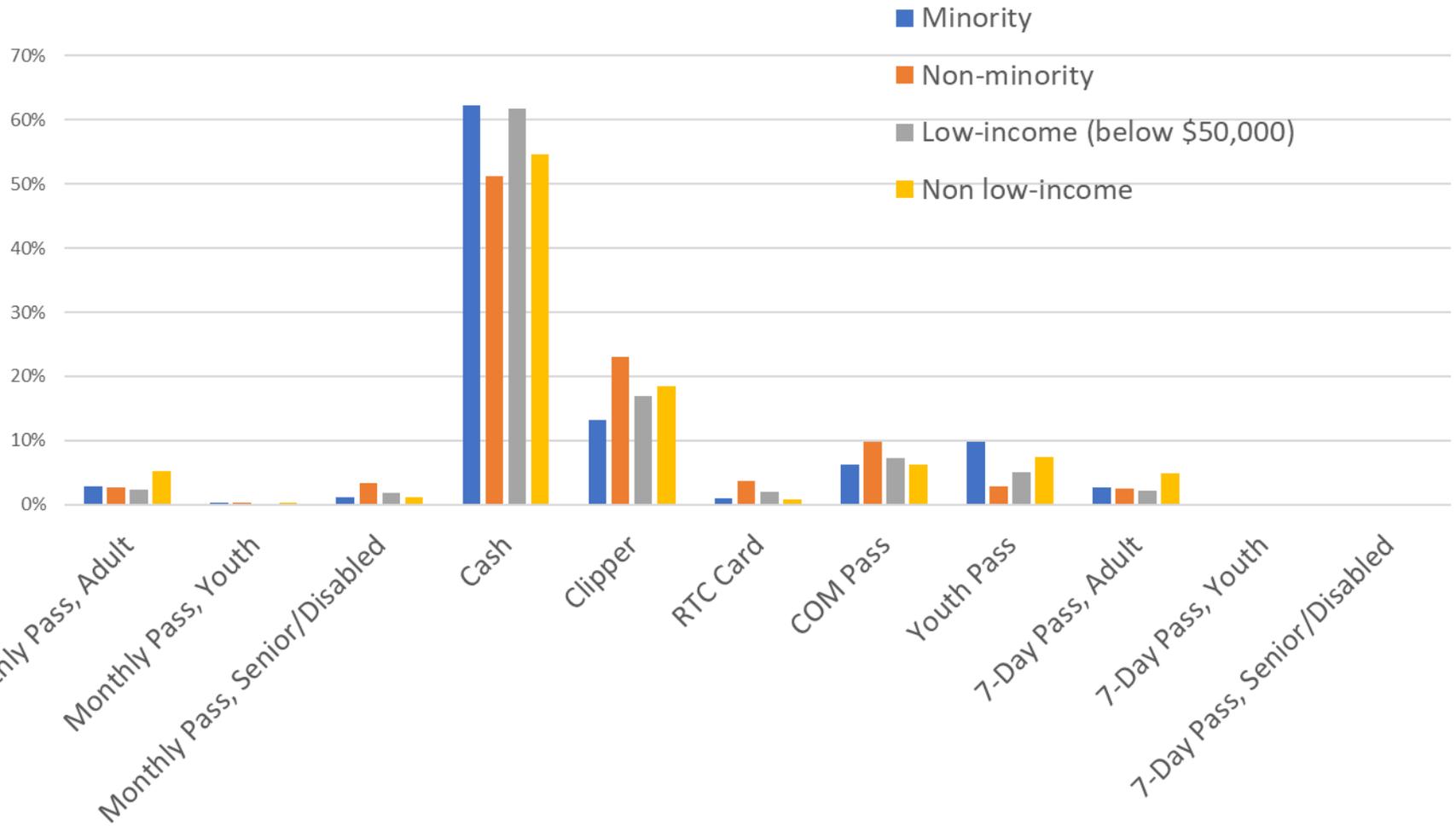
Table 10: Proportion Using Marin Transit Passes Based on Overall Fare Payment Methods Used by Minority and Low-Income Riders

Fare Payment Methods	Ridership Information (%)			
	Minority	Non-minority	Low-income (below \$50,000)	Non low-income
Monthly Pass, Adult	3%	3%	2%	5%
Monthly Pass, Youth	0%	0%	0%	0%
Monthly Pass, Senior/Disabled	1%	3%	2%	1%
Cash	62%	51%	62%	55%
Clipper Electronic Fare Card	13%	23%	17%	19%
Regional Discount Card for Disabled Riders (RTC)	1%	4%	2%	1%
College of Marin (COM) Pass	6%	10%	7%	6%
Annual & Semester Youth Pass *	10%	3%	5%	7%
7-Day Pass, Adult	3%	2%	2%	5%
7-Day Pass, Youth	0.1%	0.1%	0.1%	0.11%
7-Day Pass, Senior/Disabled	0.0%	0.1%	0.1%	0.01%

***Under Marin Transit’s Annual and Six-Month Youth Pass Program, 94% of passes are distributed free to eligible low-income students. See page 25 of this report.**

The data from **Table 10** is displayed as a chart on the following page and shows the low usage of Marin Transit Monthly and Weekly Passes compared to cash fares and use of the regional electronic Clipper card.

Fare Payment by Ridership Group



In **Table 11**, staff uses the results of the 2017 on-board passenger survey to analyze the potential for disparate impacts based on minority status or disproportionate burden based on low-income (those reporting annual household incomes below \$50,000). The analysis finds that the reduction in the price of monthly passes provides significant net benefits to each population. Based on the responses, minority riders will experience more benefits than non-minority. Minorities will experience 58.8 percent of the benefit from the reductions and non-minority riders will experience 41.2 percent. The results for low-income riders who purchase monthly passes is reversed. Low-income riders will experience 43.6 percent of the overall benefit while non-low income riders will experience 56.4 percent of the benefit. Marin Transit's policy on disproportionate burden has a threshold of 20 percent variance in the relative burden or benefit of a fare change. The variance in the equity analysis is 12.8 percent.

Note that this analysis is based on a statistically small number of surveyed riders who purchase monthly passes. Of those who responded, 18 identified as low-income and 12 identified as not low-income.

FTA requires Marin Transit to document the percentage change and the absolute change in fares to determine the relative distribution of benefits or burdens. Under FTA guidance, an agency multiplies the fare increase or decrease of each specific fare with the number of riders for each specific fare.

Using the data in **Table 11**, this calculation is $(\$40)(24 \text{ minority riders})$, then $(\$40)(9 \text{ non-minority riders})$ and $(\$40)(18 \text{ low-income riders})$ and $(\$40)(12 \text{ non low-income riders})$. The results of multiplying these figures show the distribution of average monthly benefit of the pass price reductions, as follows:

- \$27.29 for minority pass purchase;
- \$19.09 for non-minority pass purchasers;
- \$23.94 for low-income pass purchasers; and
- \$30.94 for non-low income pass purchasers.

FTA guidance specifies that the transit agency add the average fare changes and divide them by the total number of riders in that category. The average minority ridership decrease is \$29.70, which is derived by adding \$960 and \$50 (\$1,010) and dividing that figure by the total number of minority monthly pass purchasers (34, excluding the youth pass category).

The next step is to add the average pass price decrease for minority and non-minority (\$29.70 and \$20) and divide the minority rider figure and non-minority figure separately by the aggregate figure (\$49.70). This is used to determine the percentage decrease for minority and non-minority riders from the average reduction in the cost of the monthly pass calculated as $\$29.70/\49.70 minority and $\$20.00/\49.70 non-minority. Based on the survey responses, the results indicate that minority riders will receive 60 percent of the benefit and non-minority riders will receive 40 percent. Minority riders will benefit substantially more than non-minority riders, and there is no disparate impact from the monthly pass price reduction. The 2017 survey indicated that 71 percent of Marin Transit identify as non-white. Marin Transit anticipates that the price reduction will provide an additional incentive for minority riders to purchase a monthly pass.

Staff repeated this calculation for low income and non-low income riders, using \$24.68/\$57.68 to determine the share of benefits for low-income riders and \$33.00/\$57.68 to determine the share of benefits for non-low income riders. Based on the survey responses, these results indicate that low-income riders will receive 43 percent of the benefit and non-low income riders will receive 57 percent.

The percentage difference in benefit for low-income versus non-low-income riders is 14 percent. This figure is within Marin Transit's threshold for disproportionate burden, which is 20 percent. According to the 2017 on-board survey, 59 percent of Marin Transit riders are from low-income households.

Marin Transit anticipates that cutting the price of the Adult Monthly Pass from \$80 to \$40 will provide an incentive for a higher proportion of low-income riders to purchase a monthly pass. The \$40 pass price is two times the current weekly pass price of \$20.

These results are shown in **Table 11**, below.

Table 11: Title VI Equity Analysis of Fixed Route Pass Program Changes, On-Board Survey

2017 Fixed Route Survey Findings (out of 1214 surveys)	Fare Information				Average Fare Change				Relative Distribution of Fare Change by Category			
	Minority	Non-minority	Low-income (below \$50,000)	Non low-income	Current fare	New fare	Fare change %	Fare change absolute	Minority	Non-minority	Low-income	Non-low-income
Monthly Pass, Adult	24	9	18	12	\$80.00	\$40.00	-50%	\$40.00	\$960	\$360	\$720	\$480
Monthly Pass, Youth	3	1	1	1	\$40.00	\$40.00	0%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Monthly Pass, Senior/Disabled	10	12	14	3	\$25.00	\$20.00	-25%	\$5.00	\$50	\$60	\$70	\$15
Average benefit for each category									\$29.70	\$20.00	\$24.68	\$33.00
Percent benefit by category									60%	40%	43%	57%

Table 12: On-Board Survey of Marin Transit 7-Day Pass Purchases, by Category

2017 Fixed Route Survey (out of 1214 total surveys)	Minority	Non-minority	Low-income (below \$50,000)	Non low-income	Pass Price	Proposed Action
7-Day Pass, Adult	22	9	16	11	\$20.00	Eliminate
7-Day Pass, Youth	1	0	0	0	\$10.00	Eliminate
7-Day Pass, Senior/ Disabled	0	0	1	0	\$10.00	Eliminate

Eliminating the Weekly Pass

Table 12 above summarizes the number of fixed-route passengers that stated that they purchased a 7-Day Pass in the 2017 on-board surveys by minority and low-income status. Out of 1214 surveys, 49 passengers or four percent responded that they purchased the 7-Day Pass. Based on actual recorded use of the 7-Day Pass, less than one percent of all Marin Transit riders use this pass.

The proposal eliminates Marin Transit's seven-day passes for all categories. The price is currently \$20 for adults, which is equivalent to an \$80 monthly pass. The fare proposal cuts the price of adult monthly passes by 50 percent, from \$80 down to \$40. The monthly pass for youth will be rolled into the adult pass and the price will be the same. By cutting the monthly pass price in half, Marin Transit hopes to incentivize ridership in two ways. First, promote the purchase of a \$40 monthly pass. Second, encourage more passengers to take advantage of the fare discounts that accompany use of the regional Clipper Electronic Fare Card. Clipper provides a ten percent discount per trip.

The current weekly pass for Senior and Disabled riders is \$10, and the monthly pass is \$25. The proposal will reduce the price of a monthly pass to \$20. This is equivalent to the price of two current weekly passes. For Youth, the current weekly pass price is also \$10. The monthly pass for youth riders will remain at \$40.

Impact of Eliminating Marin Transit's Six-Month Youth Pass

Marin Transit has offered a school-based Youth Pass program to Marin County students for the past ten years. In fiscal year 2018/19, over 4,600 youth pass "stickers" were distributed to 33 participating public and private schools. Of these, 49 were for six-month passes. The six-month stickers distributed constitute just one percent of the total distributed. The six-month pass costs \$175, and the annual pass costs \$325. The annual pass provides a 5-10 percent discount for students who ride Marin Transit daily to and from school. Students whose families demonstrate income restrictions similar to the State-administered free and reduced-price meal program participate in the Youth Pass Program at no charge. Of the 49 six-month passes issued, 39 were purchased and ten were issued to students for free.

Based on the District's annual report, *Analysis of the 2018-19 Marin Transit Youth Pass Program*, 94 percent of all Marin Transit youth passes are distributed for free to low-income students. Only six percent of the youth passes were purchased. Marin Transit has data that tracks youth flash pass usage. However, that data does not distinguish between the two categories of youth passes (the six-month and annual youth pass).

As part of the proposed changes to Marin Transit passes, the District proposes eliminating the six-month pass. The free pass program for income-eligible students will remain unchanged.

Youth who are not eligible for the free pass program will continue to have the option to purchase the \$1.00 youth cash fare, a monthly pass at the current price of \$40, or to purchase the annual pass. Marin Transit anticipates there will be minimal impacts due to eliminating the six-month youth pass. There will be no impact on low-income students due to the availability of the free pass program.

Conclusion

Using the results of the Marin Access rider survey, the fare equity analysis of the proposed increase in Paratransit fares indicates that the burden of the fare increase is shared equally among Marin Access riders. There is no difference between the impact to minority and low-income clients and those who are not and, therefore, no disparate impact or disproportionate burden. At the same time, Marin Transit has identified a package of mobility program incentives and revisions to the Marin Access Low-Income Fare Assistance program that mitigate the impacts. These will increase subsidies for alternative and premium mobility options while clarifying program eligibility for low-income clients using the Elder Economic Index. Low-income eligible clients who are able to ride fixed route services will receive free monthly passes.

Based on analysis of 2017 Marin Transit fixed-route survey responses, minority riders will receive 60 percent of the benefit and non-minority riders will receive 40 percent from the reductions in monthly pass prices. This indicates that minority riders will benefit substantially more than non-minority riders, and there is no disparate impact from the monthly pass price reduction. In the 2017 survey, 71 percent of Marin Transit riders stated that they were either minority or other. Marin Transit anticipates that the reduced monthly pass price will provide lead to more participation from minority riders.

For Marin Transit's low-income riders, the equity analysis indicates that low-income riders will receive 43 percent of the benefit and non-low income riders will receive 57 percent. The difference in benefit for low-income and non-low-income riders is 14 percent and within Marin Transit's threshold for determining disproportionate burden, which is 20 percent.

The 2017 on-board survey found that 59 percent of Marin Transit riders are from low-income households. Marin Transit anticipates that reducing the Adult Monthly Pass from \$80 to \$40 will increase the incentive for low-income riders to purchase a monthly pass.

Marin Transit is prepared to conduct a thorough, multi-faceted public education campaign in Spanish and English after changes are approved by the Board. Marin Transit anticipates implementing the fare proposal package on July 1, 2020. The District will monitor changes in travel behavior and program participation by minority and low-income Marin Access eligible clients and identify any unanticipated impacts. Marin Transit meets regularly with the Marin County Paratransit Coordinating Council and the Marin Mobility Consortium. These meetings provide a forum for discussing the impacts of the changes and identifying improvements. The District will continue to use rider survey data and review comments from Marin Access and Marin Transit fixed-route riders and monitor Pass program usage. Staff will develop future recommendations for improvements, as needed, to ensure that Marin Transit is meeting its goals and maximizing mobility for its most vulnerable riders.

**Title VI Fare Equity Analysis
Proposed Pilot Program to Discount Marin Transit
Fixed Route Fares for Eligible Low-Income Riders on the Regional
Electronic Fare Payment System**

Marin Transit

October 5, 2020

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Executive Summary

At its October 5, 2020 meeting, the Marin Transit Board of Directors will consider whether the District will participate in the region's Clipper START Program to provide discounted fares on Marin Transit's fixed route services. The Metropolitan Transportation Commission (MTC) is sponsoring this pilot program, which is a product of a multi-year Bay Area study of means-based fares. The MTC program description is provided as Appendix A to this report. The Program would provide a ten percent fare subsidy for single rides that provide a 50 percent discount for eligible riders on Marin Transit fixed route services.

Marin Transit is proposing to participate in this program, and staff have conducted a Title VI Fare Equity Analysis of the fixed route fare changes proposed for November 2020. To take advantage of the reduced fares, eligible riders will need to utilize the Clipper regional electronic fare system. This equity analysis examines how the proposed electronic fare reduction will alter incentives for fare payment and offers discounted low-income fares for eligible riders. The analysis evaluates the impacts of the proposed changes, identifies mitigations, and applies the District's adopted polices for disparate impact and disproportionate burden.

This report will describe the public participation components that led to the Metropolitan Transportation Commission to implement a program to support regional means-based fare discounts. Public input is essential to understanding the concerns and priorities of riders. Marin Transit will hold a public hearing on October 5, 2020 to obtain input on the District's participation prior to approval. Public input will also inform the District's outreach efforts in advance of implementing the fare discount program. MTC has proposed November 2020 for Marin Transit's participation.

In early 2020, staff completed a fare equity analysis that demonstrated that an overall package of proposed Marin Access fare and fare assistance program changes will not result in a disparate impact or disproportionate burden for minority or low-income clients. Most important for this report, the equity analysis also considered proposed changes to Marin Transit fixed route pass programs that determined these changes will substantially benefit Marin Transit's older adult, disabled, minority, and low-income riders. Staff reviewed and reported on the District's extensive planning and public participation process that informed the development of these proposals. In February, the Board of Directors approved the package of changes to mobility management fares and program eligibility and the cost of fixed route passes. These changes went into effect on July 1, 2020.

For the current proposal, staff evaluated the relative benefits of the electronic-only fare reductions for eligible low-income residents and applied Marin Transit's thresholds for identifying disparate impact and disproportionate burden. This analysis is based on data from the 2017 on-board passenger survey regarding fare payment methods by minority and low-income status. The results indicate that the relative distribution of benefits from participating in Clipper START do not meet the District's thresholds.

Background

Marin Transit staff actively participated in MTC's 2015-2016 regional means-based fare study meetings to develop the pilot project that ultimately became Clipper START. Marin Transit has an extended history of exploring potential changes to its fare policies in the 2016 and 2018 Short Range Transit Plans (SRTP). The District's 2018 SRTP provided guidance on a potential fare change to meet District goals. For the 2020-2029 SRTP, staff performed a comprehensive assessment of fare policies across all programs. The assessment and resulting recommendations are described in Appendix B of the 2020 -29 SRTP. The goals that guided the development of recommended changes significantly overlap with the goals of the Clipper START program. Marin Transit's fare policy goals are to:

- Encourage use of pass and Clipper electronic fare media over cash payment to streamline and improve operations;
- Offer fare media that incentivizes ridership and simplifies payment;
- Keep fares and subsidy levels commensurate with the services offered across programs;
- Adjust fare assistance programs to maximize social equity and provide mobility options for all Marin residents;
- Maintain cost-effectiveness targets by service typology; and
- Keep Marin Transit fare policies consistent with regional efforts to coordinate and integrate transit agencies fares.

Staff weighed the recommended changes and guidelines to ensure they are consistent with regional goals and facilitate transfers with partner transit agencies. Staff prepared a detailed data analysis to develop the recommended fare change proposal. The comprehensive review evaluated these three areas in combination:

1. Low-income fare assistance (LIFA) for older adults and persons with disabilities;
2. Program eligibility for demand response programs; and
3. Fare policies for mobility management programs, paratransit, and fixed-route services.

The changing structure of the regional Clipper electronic fare payment program also influenced the recommendations. Marin Transit cannot independently change its fares within the Clipper system as it shares its fare table in Clipper with Golden Gate Transit. All changes to local fares must be agreed upon by both Marin Transit and Golden Gate Transit until Marin Transit is provided independence under Clipper. Based on these factors, staff updated the proposed changes as an important next step in implementing new programs and advanced technologies.

In 2018 and 2019, Marin Transit conducted an extensive public participation process to develop a comprehensive fare change proposal for July 2020 implementation. The Board approved a combination of changes to the District's Fare Policy, Program Eligibility, and Low-Income Fare Assistance in February 2020.

Title VI Requirements

Title VI of the Civil Rights Act of 1964, Section 601 states: “No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Marin Transit seeks to avoid, minimize or mitigate disproportionately high and adverse impacts on minority and low-income populations. As a recipient of financial assistance from the Federal Transit Administration (FTA), Marin Transit is required to comply with Title VI of the Civil Rights Act of 1964 by evaluating service and fare changes at the planning and programming stages to determine whether those changes have discriminatory impacts, including Disparate Impacts on minority populations and/or Disproportionate Burdens on low-income populations.

In 2012, FTA issued guidance under FTA Circular 4702.1B (Title VI Requirements and Guidelines for Federal Transit Administration Recipients) and Circular 4703.1 (Environmental Justice Policy Guidance for Federal Transit Administration Recipients) requiring transit agencies to develop policies when they contemplate service or fare changes. Despite being an FTA requirement, a Title VI Equity Analysis does not replace the responsibility for conducting an ongoing process that considers equity among other factors when designing fare changes, service changes, or discretionary policies and programs.

Marin Transit’s Title VI Program

Marin County has approximately 250,000 residents, and they are located primarily along the U.S. Highway 101 corridor stretching to Sonoma in the north and San Francisco to the south. Most of Marin County consists of protected open space; national, state, and local parks; and agricultural preservation areas in South and West Marin. Marin Transit carries 3.3 million local transit and paratransit trips each year. Based on a 2017 Marin Transit fixed route passenger survey, approximately 59 percent of local riders are low-income and approximately 71 percent identify as minority or other. Consistent with FTA’s Title VI guidance, minority population is defined as all persons who self-identify as not white in the US Census and persons who identify as Latino or Hispanic regardless of race. As applied in Marin Transit’s 2017 Title VI Program, low-income is defined as households earning less than \$50,000 annually. Over half of the survey respondents identified as Hispanic (52%).

Table 1 below updates demographic analysis in the District’s Title VI Program table with the results of the 2017 On-board Ridership Surveys and 2017 American Community Survey (ACS) data. The countywide average proportion of minorities residing in Marin County is 28 percent. In all cases, Marin Transit routes serve predominantly minority and low-income residents based on passenger survey results and ridership statistics. Marin Transit conducted its most recent onboard passenger survey in 2017.

The 2017 Board-adopted Title VI Program sets procedures that the District must follow regarding fare and major service change proposals. As defined under the program, major service and fare changes are subjected to an equity analysis to identify disparate and disproportionate impacts. Marin Transit fare

change proposals are developed based on a long process of research, survey, and public participation. Before Board approval of any fare change, the District provides a meaningful opportunity for riders and the general public to discuss possible impacts and comment on any proposed mitigation measures. This includes discussion of less discriminatory alternatives that may be available, in advance of any action on the proposals that the Board of Directors may approve.

To comply with the 2012 FTA Title VI guidance, the Marin Transit Board adopted Policies on Major Service Change, Disparate Impact, and Disproportionate Burden for evaluating service and fare changes on June 24, 2013. These three policies established a definition of what constitutes a major service change to require an equity analysis and a statistical threshold to determine whether minority and low-income riders are disproportionately impacted by a service or fare change. These are provided as **Appendix A** with a description of the public outreach efforts associated with establishing these policies.

Table 1: Demographic Overview of Transit Riders in Marin County

	Transit Rider (Onboard Survey Results)				Marin County % ⁽¹⁾
	2005	2008	2012	2017 ⁽²⁾	
Age					
Persons under 18 years old	18%	25%	21%	11%	20%
Persons between 18 and 65 years	78%	70%	72%	80%	60%
Persons 65 years old and older	4%	5%	7%	9%	20%
Gender					
Female	48%	46%	49%	44%	51%
Male	52%	54%	51%	56%	49%
Household Income					
Under \$25,000	51%	61%	57%	35%	12%
\$25,000 to \$49,999	28%	18%	20%	24%	13%
\$50,000 to \$74,999	10%	8%	7%	12%	12%
\$75,000 or more	10%	13%	16%	29%	63%
Race					
Hispanic	n/a	49%	43%	52%	16%
Caucasian/White	n/a	36%	39%	29%	72%
African American	n/a	9%	7%	7%	2%
Asian	n/a	8%	5%	5%	6%
Other	n/a	5%	6%	7%	4%

Notes: (1) U.S. Census Bureau, 2013-2017 American Community Survey

(2) The 2017 Marin Transit onboard survey did not include Supplemental school routes that were included in previous survey efforts.

Process for Developing the Regional Mean-Based Discount Fare Program

Public and Stakeholder Engagement

The Metropolitan Transportation Commission (MTC) is the metropolitan planning organization serving the nine-county San Francisco Bay Area. Marin Transit and peer transit operators met regularly with MTC staff during the development of the pilot program to discuss goals and study findings and provide feedback.

Concurrent to these meetings, MTC established a Technical Advisory Committee (TAC) to provide input and feedback on the study. The TAC consists of a broad-based group of stakeholders including representatives from public transit operators, social and human services agencies, academia and non-profit organizations. Starting in May 2015, the TAC met four times through the course of the study on these dates, here linked to the minutes for each: [May 28, 2015](#), [August 3, 2015](#), [August 4, 2016](#), and [December 16, 2016](#). MTC advertised these meetings consistent with the Brown Act and invited public participation, and the minutes document the comments and questions at each stage. The second and the third meetings provided input into evaluating alternative program scenarios and the fourth on the draft study reports.

MTC Reports Resulting from the Means-Based Fare Study

Links to Draft Final MTC Reports, as of October 2020

- [Project Overview Report](#)
An executive summary of the study, encompasses information from each of the detailed tech memos below.
- [Tech Memo #1: Policies and Conditions](#)
- [Tech Memo #2: Alternative Fare Scenarios](#)
- [Tech Memo #3: Evaluation of Alternative Means-Based Transit Fare Scenarios](#)
- [Tech Memo #4: Alternatives Evaluation and Recommended Actions](#)

Clipper 2.0 and Clipper START

As MTC identified in its Plan Bay Area 2040 goals, increasing the region's transit mode share requires multi-agency transit trips to play a more significant role in Bay Area travel. In May 2018, MTC approved a revised Resolution No. 4320. Regional Means-Based Transit Fare Pilot Program Framework to develop a Means Based Transit Fare Pilot Program. To start, four large Bay Area transit operators (BART, Caltrain, Golden Gate Bridge and Ferry, and SFMTA) would participate in the pilot program and offer a 20 -50 percent discount on single rides to eligible patrons.

Clipper START is a tool to create a seamless transit experience that prioritizes consistency, predictability, and convenience for low-income riders. MTC convened a Fare Integration Seminar with partner transit

operators that reached agreement to pursue a business case and implementation study. For the region, the Clipper START pilot is one component of a larger effort to better understand the economic, strategic, financial, and operational case for multiple new regional fare concepts.

The Clipper START program allows adults who live in the Bay Area and whose annual earnings are up to 200 percent of the federal poverty level to qualify for fare discounts. The Clipper START pilot requires riders to use Clipper for fare payment. Riders can apply online or by submitting a paper application. Applicants will need to provide proof of identity and proof of income, and those approved will receive a personalized Clipper card that can be used for single-ride discounts on the participating transit agencies' systems. More information about the program and the online application can be found at www.clipperstartcard.com. See **Appendix F** for a fact sheet on Clipper START administration and eligibility requirements.

MTC and partner transit operators determined that the timing of the second generation of Clipper (2.0) provided the opportunity to test this regional discount fare while simplifying business rules. In June 2019, the MTC Board of Commissioners made a formal request to the Clipper Executive Board to develop and implement a means-based discount program. The initial four large transit operators implemented the START program in mid-2020. Marin Transit is included as one of the second phase operators to participate in the pilot, after Board consideration and approval.

Marin Transit Fare Policy Updates and Participation in Clipper START Pilot Program

Marin Transit is committed to ensuring that no person is excluded from participation or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act. The District follows a set of performance standards and objectives that reflect the District's mission to promote environmental justice and provide equal access to its transportation services.

In 2016, the District released the *Marin Access Strategic Analysis and Recommendations Study*. This Study recommended changes to Marin Access fares and eligibility thresholds.

As part of the SRTP 2020-2029, Marin Transit conducted a comprehensive evaluation of fare pricing and policies across all programs and evaluated eligibility standards for Marin Access program to develop changes that will benefit riders and increase the financial sustainability of Marin Transit programs.

The primary goals that guided the July 2020 changes to the District's fare policy included:

- Maximizing social equity and providing mobility options for all Marin residents, and
- Keeping Marin Transit fare policies consistent with regional efforts to coordinate and integrate transit agencies fares.

Changes to Marin Access fare policy introduced an expanded Low-income Fare Assistance (LIFA) program that increased the income thresholds and bridged the gap for the low-income riders with household income above the Federal Poverty Level and below the Elder Index. Marin Transit designed the new Fare Assistance program to increase the financial safety net for older adults and persons with

disabilities who rely on mobility management programs and services, including Rural Dial-A-Ride in West Marin. Eligible low-income riders can also opt-in to receive a free pass to use on Marin Transit local bus service.

The District's updated fare policy also adjusted pricing of fixed route period passes to provide an additional discount for regular riders who regularly ride public transit. These changes reduced the price of Adult Monthly Passes by 50 percent and Senior Monthly Passes by 20 percent.

Marin Transit staff participated in the MTC Means-Based Fare Policy TAC concurrently with this effort to reconfigure the Marin Transit fare policies and programs. The regional Clipper START pilot program is consistent with the Marin Transit's goals and recommendations that went into developing the July 2020 changes to the District's Fare Policies. Clipper START is a tool to create a seamless transit experience that prioritizes consistency, predictability, and convenience for low-income riders.

Marin Transit Fare Policies and the Short Range Transit Plan

Marin Transit updates its Short Range Transit Plan (SRTP) every two years. The SRTP is a fiscally constrained five-year blueprint with a ten-year financial outlook. The SRTP is informed by completed and ongoing planning efforts, including the 2016 Marin Access Study and related actions. The Marin Transit fare policy and program proposals build on the principles and priorities of the SRTP and extensive public participation opportunities. These include community-based transportation plans for Marin City in Southern Marin and for the Canal neighborhood in San Rafael and ongoing public participation activities. The 2016, 2018, and 2020 plans reflect the goals and guiding principles for proposed changes to fare policies and programs.

As approved by the Board in early 2020, **Table 2** shows Marin Transit's fare structure and pricing effective July 1, 2020.

Table 2: Current Marin Transit Fixed Route, Dial-a-Ride, and Mobility Management Program Fares, next page

Marin Transit Fares	Current (as of July 1, 2020)	July 1, 2023 (2 nd Phase of Marin Access Changes)
Adult		
Adult Cash Fare	\$2.00	No change
Adult Clipper Single Ride	\$1.80	No change
Adult 1-Day Pass	\$5.00	No change
Adult 31-Day Pass	\$40.00	No change
Older adults 65+ / Persons with Disabilities		
S/D Cash Fare	\$1.00	No change
S/D Clipper Single Ride	\$1.00	No change
S/D 1-Day Pass	\$2.50	No change
S/D 31-Day Pass	\$20.00	No change
Youth Ages 5 - 18		
Youth Cash Fare	\$1.00	No change
Youth Clipper Single Ride	\$1.00	No change
Youth 1-Day Pass	\$2.50	No change
Youth 31-Day Pass	\$40.00	No change
Annual Youth Pass	\$325.00	No change
Annual Youth Pass - low income	Free	No change
Marin Access		
Novato Dial-A-Ride	\$4.00/\$2.00	No change
Rural Dial-A-Ride	\$4.00/\$2.00	No change
Paratransit - Mandated	\$3.00	\$4.00
Paratransit - Extended	\$3.00	\$4.00
Catch A Ride	\$4.00 + 100% of fare above \$18.00 Limit of 10 trips/month	\$5.00 + 100% of fare above \$19.00 Limit of 10 trips/ month
Volunteer Driver	No Fare - Driver reimbursement of \$0.60/mile	No change

Public Participation Before and After the Public Comment Period on Clipper START

Marin Transit developed and documented public participation plan to provide adequate notice of public participation activities and opportunities for public review and comment at key decision points to develop a changes in the District's Fare Policies. That plan informs the District's participation plan for Clipper START pilot program and this equity analysis.

Marin Transit's public participation strategies follow US Department of Transportation planning regulations. The federal statutory and regulatory framework creates a proactive program of engagement, interaction, and accountability for decision makers, interested parties, and the public. Fundamental to this program, the District seeks out and considers the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment, healthcare, and other services. The outreach plan in advance of the final recommendation to the Board was fully consistent with the District's Title VI Program Public Participation Plan.

Marin Transit identified and remedied potential adverse effects based on public input. This section summarizes the recent public participation process for developing this proposal and identifying adverse effects. This provides background and leads into the public process to consider the proposed Clipper Fixed Route Fare Discount for eligible riders.

The Marin Transit Board opened the public comment period at its September 14, 2020 meeting, and will hold a public hearing on the current proposal at its October 5, 2020 meeting. Simultaneous professional translation will be provided on request. Options for public input on the proposal Clipper fare discount include mail, email, telephone, online comment form, and in-person. Staff provided notice of these opportunities in Spanish and English in the Marin Independent Journal, on the District's website, on-board buses and at major bus stops, and through emails, social media, and community partner newsletters. The District established a webpage to provide information on the proposal at marintransit.org/clipperstart. Staff recorded all public comments, and documented emails and online comment forms (provided in **Appendix G**).

Clipper START Eligibility Thresholds

For the Clipper START discount equity analysis, eligibility is based on incomes that are at or below 200 percent of the federal poverty level. Marin Transit relied on the 2017 Passenger Survey, which identified low-income households as those with incomes of \$50,000 or less.

Note that MTC uses the current equivalent of 200 percent of the federal poverty level – about \$52,500 annually for a four-person household. The eligibility and income thresholds are summarized in **Table 3** below and in the factsheet provided in **Appendix F**. Marin Transit will consider updating the income categories in future passenger surveys to better reflect this standard.

Table 3: Clipper START Eligibility Thresholds by Household Size

Household	Household income up to
1	\$25,520
2	\$34,480
3	\$43,440
4	\$52,400
5	\$61,360
6	\$70,320
7	\$79,280
8	\$88,240

Proposed Discount to Marin Transit Fixed Route Fares for Eligible Low-Income Riders

Marin Transit’s Clipper START fares and Marin Local fares on Golden Gate Transit regional routes

Marin Transit discount amount for Marin Transit will be 50 percent off of the Adult Cash Fares defined in **Table 4** below. The zones refer to Golden Gate Transit fare zones, as programmed in Clipper. Marin Transit anticipates that its fare categories will become independent of Golden Gate Transit in early 2024. Note that the Golden Gate Bridge Highway and Transportation District (GGBHTD) will hold a public hearing to consider comment on applying the Clipper START fare to Marin Local Fares paid on Golden Gate Transit regional routes. GGBHTD will evaluate the results of their separate Title VI analysis of the Clipper START program for riders of regional services within Marin County at an October 2020 meeting and consider approval at that time. At this time, Marin Local riders on GGBHTD regional routes pay the same fares as those on Marin Transit based on fare category.

Table 4: Marin Transit – Current Adult Cash Fares

Zones		To Zone		
		Z2	Z3	Z4
From Zone	Z2	\$2.00	\$2.00	\$2.00
	Z3	\$2.00	\$2.00	\$2.00
	Z4	\$2.00	\$2.00	\$2.00

Table 5: Marin Transit – Means-Based Discount (Clipper START) Adult Fares

Zones		To Zone		
		Z2	Z3	Z4
From Zone	Z2	\$1.00	\$1.00	\$1.00
	Z3	\$1.00	\$1.00	\$1.00
	Z4	\$1.00	\$1.00	\$1.00

The Marin Transit Adult fares when using Clipper Coupon are reduced by 50 percent from the Adult Cash Fares defined in **Table 4** above. For eligible Clipper START participants who already use Clipper, the discount is \$.80 or 44 percent.

Transfers from Regional Operators

Golden Gate Bus to Marin Transit - Two additional free rides within two hours of first boarding Marin Transit and tagging off the last Marin Transit ride.

Golden Gate Ferry to Marin Transit - Two additional free rides within three hours of boarding Golden Gate Ferry.

SMART to Marin Transit - Discounted ride within four hours of tagging off SMART and tagging off Marin Transit. Transfer Discount (Clipper START Discounted Adult): \$1.50

Table 6: Transfer Credits for Clipper START Participants

Zones		To Zone		
		Z2	Z3	Z4
From Zone	Z2	-	-	-
	Z3	\$0.25	\$0.25	\$0.25
	Z4	\$0.25	\$0.25	\$0.25

SMART accepts fare payment through e-ticket apps or Clipper. Clipper electronic fare cards can be loaded with either e-cash or a monthly pass. SMART e-tickets do not receive the transfer credit, and SMART transfers are entirely through Clipper.

Because Marin Transit is linked with Golden Gate Transit in Clipper, Marin Transit is not able to separate out transfers between SMART to Golden Gate Transit and SMART to Marin Transit. Marin Transit did not include questions regarding transfer behavior in its 2017 Passenger Survey. Thus, there is no demographic data available related to these riders. Prior to the COVID-19 pandemic, staff estimates there were approximately 100 transfers per day occurring between SMART and Marin Transit.

Fare Payment Methods from the 2017 Passenger Survey

Marin Transit has analyzed data on fixed route fare payment methods from its most recent on-board passenger survey in 2017. This is summarized in **Table 7**, below. Marin Transit used the survey data to identify the fare media usage distinguished by rider characteristics, i.e. minority and low-income.

Minority populations are those who identified themselves as American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latin, Native Hawaiian or Other Pacific Islander. Consistent with the Marin Transit 2017 Title VI Program, low-income is considered as households that earn less than \$50,000 annually.

Table 7: Survey Results for all Marin Transit Fare Payment Methods by Minority and Income Status, Actual Total Reported Methods

Fare Payment Method	Ridership Information (Numbers)				Total Surveys
	Minority	Non-minority	Low-income (below \$50,000)	Non low-income (\$50,000 or more)	
Cash	529	182	464	124	1,214
Clipper	113	82	127	42	
Marin Local	4	2	2	1	
Marin Local	11	13	15	3	
Regional	9	13	15	2	
College Pass	53	35	55	14	
Youth Pass	83	10	38	17	
Total	851	356	752	227	

Based on 1,214 surveys, **Table 8** shows the percentage of reporting fare payments using Clipper and Cash out of the total reported fare payment methods by minority and income status.

Table 8: Survey Results for Clipper and Cash Fare Payments by Minority and Income Status, As a Proportion of Total Reported Methods (2017)

	Ridership Information (%)				Total Surveys
	Minority	Non-minority	Low-income (below \$50,000)	Non low-income (\$50,000 or more)	
Cash	62.2%	51.1%	61.7%	54.6%	1,214
Clipper	13.3%	23%	16.9%	18.5%	

Title VI Equity Analysis of the Proposed 50 Percent Discount for Eligible Riders on Marin Transit using Clipper

Table 8 below estimates the proportion of minority and low-income riders who use Clipper, by applying the proportions in the 2017 survey data and actual payment methods in fiscal year 2017. This provides context for evaluating the relative impacts of the proposed mean-based Clipper discount.

The District is proposing to reduce the Adult fare on Clipper from \$1.80 to \$1.00 for eligible low-income riders who apply for the program. For eligible riders new to Clipper, the fare will be reduced from \$2.00 to \$1.00 or 50 percent. This section analyzes this proposal and describes the FTA guidance for determining disparate impact on minority populations and disproportionate impact on low-income populations.

Table 9: Proportion Using Clipper on Marin Transit Based on Overall Fare Payment Methods Used by Minority and Low-Income Riders

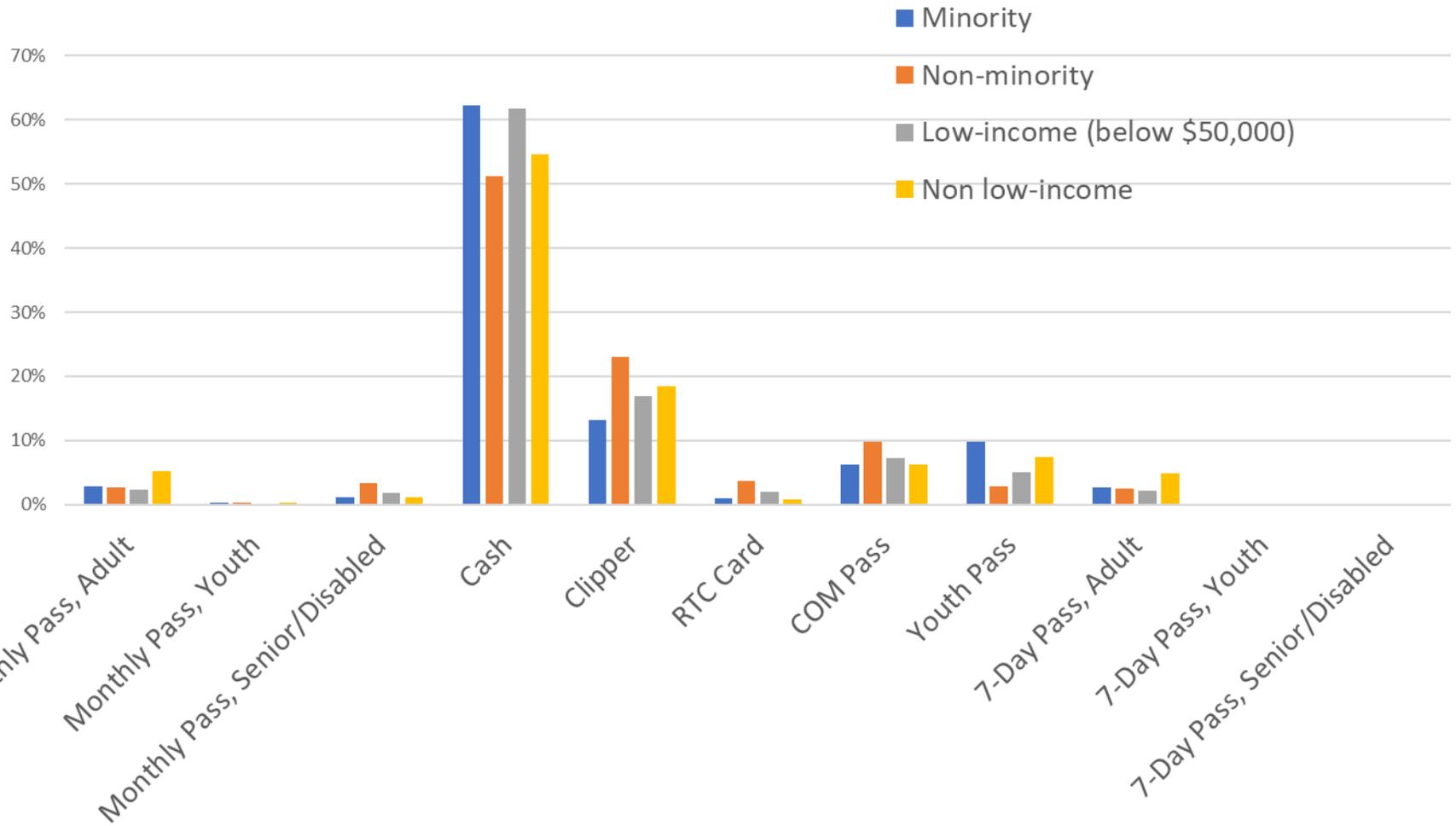
Marin Transit Fare Payment Methods Used	Ridership Information (%)			
	Minority	Non-minority	Low-income (below \$50,000)	Non low-income
Cash	62%	51%	62%	55%
Clipper Electronic Fare Card	13%	23%	17%	19%
Regional Discount Card for	1%	4%	2%	1%
Monthly Pass, Adult	3%	3%	2%	5%
Monthly Pass, Youth	0%	0%	0%	0%
Monthly Pass, Senior/Disabled	1%	3%	2%	1%
College of Marin (COM) Pass	6%	10%	7%	6%
Annual & Semester Youth Pass*	10%	3%	5%	7%
7-Day Pass, Adult**	3%	2%	2%	5%
7-Day Pass, Youth**	0.1%	0.1%	0.1%	0.11%
7-Day Pass, Senior/Disabled**	0.0%	0.1%	0.1%	0.01%

* Under Marin Transit's Annual and Six-Month Youth Pass Program, 94% of passes are distributed free to eligible low-income students.

**Eliminated as of July 1, 2020

The data from **Table 9** is displayed as a chart on the following page and shows the relative distribution of Marin Transit cash fares, use of the regional electronic Clipper card, and other payment methods.

Fare Payment by Ridership Group



In **Table 10**, staff uses the results of the 2017 on-board passenger survey to analyze the potential for disparate impacts based on minority status or disproportionate burden based on low-income (those reporting annual household incomes below \$50,000). The 50 percent discount on Clipper START is intended to be a significant incentive for eligible low-income riders to transition from cash fare payments.

The analysis finds that the reduction in the Clipper START program provides significant net benefits to each population. Based on the survey responses, minority riders will experience more benefits than non-minority. Minorities will experience 50.5 percent of the benefit from the reductions and non-minority riders will experience 49.5 percent. Low-income riders will experience 50.5 percent of the overall benefit while non-low income riders will experience 49.7 percent of the benefit. Marin Transit's policy on disproportionate burden has a threshold of 20 percent variance in the relative burden or benefit of a fare change. The equity analysis is described in detail below.

FTA requires Marin Transit to document the percentage change and the absolute change in fares to determine the relative distribution of benefits or burdens. Under FTA guidance, an agency multiplies the fare increase or decrease of each specific fare with the number of riders for each specific fare.

Using the data in **Table 10**, this calculation for cash paying discount eligible riders is (\$1)(529 minority riders), then (\$1)(182 non-minority riders) and (\$1)(464 low-income riders) and (\$1)(124 non low-income riders). The results of multiplying these figures show the distribution of average benefit of the fare reduction for eligible riders, as follows:

- \$529 for minority;
- \$182 for non-minority;
- \$464 for low-income; and
- \$124 for non-low income

For current Clipper users who are eligible for Clipper START, this calculation (\$0.80)(113 minority riders), then (\$0.80)(82 non-minority riders) and (\$0.80)(127 low-income riders) and (\$0.80)(42 non low-income riders). The results of multiplying these figures show the distribution of average benefit of the fare reduction for eligible riders, as follows:

- \$90.4 for minority;
- \$65.6 for non-minority;
- \$101.6 for low-income; and
- \$33.6 for non-low income

FTA guidance specifies that the transit agency add the average fare changes and divide them by the total number of riders in that category to determine the distribution of costs or benefits. The average minority ridership fare decrease is \$.96, which is derived by adding \$529 and \$90.4 (\$629.4) and dividing that figure by the total number of minority riders who pay cash (642). The average non-minority ridership fare decrease is \$.94, derived by adding \$182 and \$65.6 (\$247.6) and dividing that figure by the total number of non-minority riders who pay cash (591).

The next step is to add the average fare decrease for START eligible minority and non-minority riders (\$.96 and \$.94) and divide the minority rider figure and non-minority figure separately by the aggregate figure (\$1.90). This determines the percentage decrease for minority and non-minority riders from the average reduction in the cost of adult fares on Clipper START and is calculated as $\$.96/\1.90 minority and $\$.94/\1.90 non-minority. Based on the survey responses, the results indicate that minority riders will receive 50.5 percent of the benefit and non-minority riders will receive 49.5 percent. Minority riders will benefit one percent point more than non-minority riders, and there is no disparate impact from the monthly pass price reduction. The 2017 survey indicated that 71 percent of Marin Transit identify as non-white. The 50 percent discount on Clipper START is anticipated to be a significant incentive for eligible low-income riders to transition from cash fare payments.

Staff repeated this calculation for low income and non-low income riders, using $\$.96/\1.91 to determine the share of benefits for low-income riders and $\$.95/\1.91 to determine the share of benefits for non-low income riders. Based on the survey responses, these results indicate that low-income riders will receive 50.5 percent of the benefit and non-low income riders will receive 49.7 percent.

The percentage difference in benefit for low-income versus non-low-income riders is .08 percent. This figure is below Marin Transit's threshold for disproportionate burden, which is 20 percent. According to the 2017 on-board survey, 59 percent of Marin Transit riders are from low-income households. As an indicator for low-income riders, Marin Transit uses annual household income of \$50,000 or less.

These results are shown in **Table 10**, below.

Table 10: Title VI Equity Analysis of Fixed Route Fares Discounts For Eligible Low-Income Riders, On-Board Survey

2017 Fixed Route Survey Findings (out of 1214 surveys)	Fare Information				Average Fare Change				Relative Distribution of Fare Change by Category			
	Minority	Non-minority	Low-income (below \$50,000)	Non low-income	Current fare	New Fare for low income riders	Fare change %	Fare change absolute	Minority	Non-minority	Low-income	Non-low-income
Cash	529	182	464	124	\$2.00	\$1.00	-50%	\$1.00	-\$529	-\$182	-\$464	-\$124
Clipper	113	82	127	42	\$1.80	\$1.00	-44%	\$0.80	-\$90.4	-\$65.6	-\$101.6	-\$33.6
Total	642	264	591	166								
Average benefit for each category									-\$0.96	-\$0.94	-\$0.96	-\$0.95
Percent benefit by category									-50.5%	-49.5%	-50.5%	-49.7%

Conclusion

Using the results of the 2017 Marin Transit Passenger Survey, the fare equity analysis of the proposed discount in fares indicates that the benefits of the Clipper START discount program are shared equally among eligible riders. There is no difference between the impact to minority and low-income riders and those who are not and, therefore, no disparate impact or disproportionate burden.

Based on analysis of 2017 Marin Transit fixed-route survey responses, minority riders will receive 50.5 percent of the benefit and non-minority riders will receive 49.5 percent from the reduction from participating in Clipper START. This indicates that there is no disparate impact. In the 2017 survey, 71 percent of Marin Transit riders stated that they were either minority or other.

For Marin Transit's low-income riders, the equity analysis indicates that low-income riders will receive 50.5 percent of the benefit and non-low income riders will receive 49.7 percent. The difference in benefit for low-income and non-low-income riders is negligible. However, Clipper START riders will need to be educated on how to properly utilize the Clipper electronic fare system in Marin County. A substantial marketing effort is required to understand the importance of tagging off Clipper when they exit the bus.

There is a penalty for not tagging off that impacts all Clipper users riding locally on Marin Transit and Golden Gate Transit regional buses. Given the design of Clipper START, this penalty will be significantly more burdensome for those in the Clipper START program. In each case, Clipper will charge the rider the maximum fare for travel on that bus regardless of status as a START program participant. In recent years, on average 6.5 percent of Marin local riders using Clipper neglect to tag off. MTC has signaled that they are willing to devote resources to market how to use Clipper to avoid being overcharged. MTC has agreed to coordinate a marketing campaign with SMART, Golden Gate Transit, and Marin Transit.

The 2017 Marin Transit on-board survey found that 59 percent of riders are from low-income households. Marin Transit anticipates that the 50 percent reduction in fares for eligible riders will significantly increase the incentive for low-income riders to utilize Clipper over cash fare payment.

Marin Transit is prepared to work with its partner agencies to conduct a thorough, multi-faceted public education campaign in Spanish and English should the District's Board approve the Clipper START fare reduction. Based on MTC timelines, Marin Transit anticipates implementing the low-income fare discount in November 2020. The District will monitor changes in fare payment methods by eligible minority and low-income riders and identify any unanticipated impacts. The District will continue to use rider survey data and review comments from Marin Transit fixed-route riders and monitor Clipper usage. Staff will monitor participation in the pilot discount program to ensure that Marin Transit is meeting its goals and maximizing mobility for its most vulnerable riders.



Service Equity Analysis for June 2023 Service Changes

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Background

Marin Transit is proposing a number of service changes to go into effect in June 2023. These service changes have been proposed to help keep fixed route bus service reliable in Marin County. Starting in 2021, as the COVID-19 vaccines came out and the economy began reopening, many factors have emerged (or returned) that are impacting our ability to deliver reliable service in the current environment. These include growing traffic congestion, driver and staffing shortages, and lack of a District-owned operations and maintenance facility.

Staff have been working collaboratively with our contractors and identified actions that can be taken directly by the District to address these challenges. These actions include: (1) adjusting service, routing, and schedules to better accommodate driver needs and the impacts of traffic, (2) working on contract amendments to increase driver/staff pay, (3) continuing to improve District-owned facilities, (4) continuing to pursue a dedicated operations and maintenance facility, and (5) exploring contracting options to sustain service beyond June 2023. This report evaluates the equity impact of the proposed service changes associated with the first item on this list.

The primary goal of the June service change proposal is to increase the reliability of service for riders while minimizing the overall impacts on existing rider patterns. The following factors were evaluated and considered in developing the proposal:

1. **Traffic.** Congestion related to increasing traffic volumes continue to impact transit's ability to efficiently operate on local roads and highways in Marin. As traffic volumes have returned, and in some cases exceeded, pre-pandemic levels, congestion has returned to many areas of the county. This growth in congestion, coupled with a lack of investment in transit priority measures, has forced staff to revisit transit runtime globally to improve on-time performance issues.
2. **Driver Shortages and Needs.** Driver shortages and driver workplace conditions, specifically while on route, were both taken into consideration during the development of the service changes. While the total service change is expected to marginally decrease service (-2.8%), the new packaging of the service allows for an estimated 8% decrease in the number of vehicles and drivers needed to support the service. This is done through a more efficient allocation of the service and the development of more full-time shifts. This reduction eases the current pressures on hiring and drivers working overtime. As it relates to workplace conditions, the new routing achieves longer layovers and layovers are at locations closer to supportive driver facilities including restrooms. The added layover time not only improves driver conditions, but also provides padding in the schedule to increase on-time performance.



- 3. Regional Transit Changes.** While many changes have been made during, and immediately following the pandemic, perhaps the most significant change in Marin County is the reduction of regional transit services. Approximately half of all regional bus service was cut during the pandemic and is still not restored. Many local transit trips are made on the regional services due to coordinated schedules between the local services and free transfers offered between the routes in Marin County. While some changes, like the doubling of service on Route 71, were made during the pandemic to target regional losses, other changes are still needed to better support local travel in Marin and better connect to the remaining regional bus and ferry services.

Proposed Changes to Marin Transit Fixed-Route Services

The service change proposal for June 2023 is the most widespread change in terms of the number of routes impacted and the number of service changes since June of 2016. While the District implemented many changes to service during the pandemic, some were temporary and most focused on one or two specific routes.

In total, half of the District's 24 fixed route services are included in the proposed service change package. Table 1 below shows if the proposal includes a change to the route alignment, a change in service levels (frequency or span of service), and if the route is proposed to be discontinued altogether. Replacement services are shown for any of the discontinued routes. Attachment A to the Board letter provides a more comprehensive description of the exact changes proposed for each route, including graphics showing the alignment adjustments.



Table 1: Service Proposal Summary (by Route)

Route	Alignment Change	Service Level Change (frequency or span of service)	Cancel / Discontinue	Replacement Service
22	(-)	(-)		
23	(+)	(+)		
23x			X	23
29	(+/-)	(+/-)		
35	(-)			
49	(+)			
71		(+)		
219	(-)	(-)		
251			X	49, 257
257	(+)	(+)		
645			X	35
651			X	49, 257

Note: (+) indicates increase, (-) indicates decrease, (+/-) indicates increase in some areas and decrease in other areas.

The District estimates that the cumulative change in fixed route service levels, as measured in revenue hours, will only decline by 2.1%, or approximately 3,900 fewer annual revenue hours.

Service Equity Analysis Overview

To understand the impacts of the proposed changes, staff analyzed the service changes through different lenses. This was, in part to satisfy FTA requirements under Title VI as described below. However, the report includes additional information to help the Board and public understand the impacts and benefits of the proposed changes. In addition to the required Title VI analysis, a Route Level Analysis and a Neighborhood Level Analysis were prepared to illustrate the impacts of the proposed changes on individual routes and neighborhoods, and to describe how individual riders' experiences may change under the proposed service plan.



Title VI Requirements

FTA Requirements

Whenever a fixed route service provider¹ enacts a Major Service Change, the Federal Transit Administration (FTA) requires a Service Equity Analysis be conducted to ensure that the proposed changes do not have a Disparate Impact on minority populations or a Disproportionate Burden on low-income populations. This is in accordance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin, as well as Executive Order 12898, which adds the requirement to check for a Disproportionate Burden on low-income populations. This report complies with FTA requirements for data analysis as defined in FTA Circular 4702.1B, and also includes a description of the public outreach conducted in compliance with FTA requirements and the Marin County Transit District Public Participation Plan (see Appendix A).

Marin Transit's Title VI Program

The Marin County Transit District Title VI Program, updated in June 2020, defines the District's thresholds for what is considered a Major Service Change and what is considered a Disparate Impact or a Disproportionate Burden. It also defines the District's Public Participation Plan. These policies are summarized here; the full Title VI program, with greater detail on these requirements, can be found on the District's website: <https://marintransit.org/titlevi>.

Major Service Change

With some exceptions, Marin Transit defines a Major Service Change as one of four criteria:

1. The addition of a new route
2. New service on streets not previously used by any route
3. An aggregate change of 30 percent or more of the revenue hours for a particular route
4. Changing 40 percent or more of a route's path

Note that the above list is a summary and does not include all details of the Major Service Change policy. See the Title VI program (linked above) for the complete policy.

Criteria 3 and 4, as listed above, apply to this service change due to the proposed changes on routes 35, 251, and 257. As the service change proposal was crafted together with replacement service for some routes in mind on other routes, the Title VI Service Equity Analysis examines

¹ Applies to service providers running more than 50 peak hour buses in urbanized areas with more than 200,000 people.



the service change proposal holistically rather than only examining the routes with changes that qualify as a Major Service Change.

Disparate Impact and Disproportionate Burden

The FTA defines Disparate Impact as a situation where minority populations bear a greater impact associated with a service change than would be expected based on their underlying share of the service population. For example, if minority populations make up 30% of the service population, but analysis indicates that they will bear 60% of the impact associated with a service change, then a Disparate Impact may occur. Similarly, a Disproportionate Burden is when the same occurs for low-income populations.

No service change can ever perfectly spread its impacts evenly across the population. As such, the FTA requires fixed route transit providers adopt a threshold over which the difference in impact on minority or low-income populations is considered disparate or disproportionate, respectively. Marin Transit's Disparate Impact and Disproportionate Burden policy defines this threshold as 20 percent for both populations. In other words, if minority populations make up 30 percent of the service population, then 50 percent of the impacts being on minority populations is the point at which the impact would be considered disparate. The same is true for low-income populations.

For more details on this policy, see the District's Title VI program (linked above).

Public Participation

The Marin Transit's Public Participation Plan provides a framework of options and strategies to guide a customized, systematic, and strategic approach to public participation. For Major Service Changes, the only set requirements are that the Board of Directors will hold a public hearing, that translation services be available to the public upon request, and that written comment in advance be available to the public. However, the plan also provides an extensive suite of other public participation strategies that the agency may use as appropriate. See the District's Title VI program (linked above) for more details.

In accordance with the District's Public Participation Plan, a public hearing was held at the Board of Directors meeting on Monday, March 6th, 2023, at 10:00 am. Spanish translation was provided; translation services for other languages were not requested. Written comment received in advance of the hearing was forwarded to the Board of Directors for consideration. In addition, Marin Transit performed extensive public outreach with community groups, at bus stops, and on-board buses in service.

Appendix A to this Board letter documents all public participation activities the District engaged in to solicit feedback on the proposed service changes.



Title VI Service Equity Analysis

The general approach to conducting the data analysis for this Service Equity Analysis is:

1. Segment level:
 - a. Separate each instance of service increase or decrease in service into individual segments
 - b. Quantify the change in service hours associated with each segment
 - c. Determine the service area associated with each segment
 - d. Sum the total population, minority population, and low-income population in each service area
 - e. Calculate the percent of each segment's impact that will fall on minority and low-income populations
2. Systemwide:
 - a. Sum the total service increase and the total service decrease that will fall on minority and low-income populations
 - b. Calculate the percent burden of the total service increase and the total service decrease that will fall on minority and low-income populations, and compare this to the demographics of the underlying systemwide service population

Segment Level Analysis

Table 2 shows the detailed segment results step 1 above. The service area for each individual component is defined as a ¼-mile radius from each bus stop affected by the component. Any census block group touching this ¼-mile radius is considered to be part of the service area. The low-income population is defined as individuals earning below 200% of the poverty line, in line with the regional definition associated with the Clipper START program.

Note that service hours shown in the table closely align, but do not perfectly match up with, the change in revenue hours described above. This is because revenue hours incorporate a portion of layover times, and are affected by blocking changes that do not affect time the buses spend in service.



Table 2: Individual Components of the Proposed Service Change and Associated Data

Service Change Description	Increase/Decrease	Change in Annual Service Hours	Minority Percent of Service Area Population	Low-Income Percent of Service Area Population
The 22 will no longer serve Strawberry in the Northbound direction	Decrease	-417	27%	12%
The 22 will cancel some late night service	Decrease	-863	26%	15%
The 23 will no longer offer express trips	No change in service hours: all old 23X service will get rolled into the 23.			
All 23 trips go to Manor	Increase	+839	17%	17%
The 29 will no longer serve the Canal	Decrease	-412	65%	38%
The 29 will no longer serve College of Marin	Decrease	-374	21%	14%
The 29 will now serve Larkspur and Corte Madera	Increase	+1,250	26%	13%
The 35 will no longer go to Novato	Decrease	-6,541	41%	19%
The 35 will now serve Nova Albion/Las Gallinas	Increase	+913	34%	16%
The 49 will no longer serve Redwood Blvd	Decrease	-1,104	35%	15%
The 49 will no longer serve Nova Albion/Las Gallinas	Decrease	-828	35%	17%
The 49 will now serve San Marin	Increase	+4,852	31%	15%
The 71 will increase midday frequency of service	Increase	+2,346	38%	19%
The 219 will decrease in frequency and no longer serve the Tiburon Hills	Decrease	-1,410	23%	10%
Discontinue the 251	Decrease	-9,509	39%	19%
The 257 will only serve Hamilton on short trips	Decrease	-134	45%	19%
Extend the 257 up to Downtown Novato and add frequency along this corridor	Increase	+6,836	39%	20%
Discontinue the 645	Decrease	-689	54%	29%
Discontinue the 651	Decrease	-622	39%	20%

Source (demographic data): American Community Survey 2021 5-Year Samples, Tables B03002 and C17002.



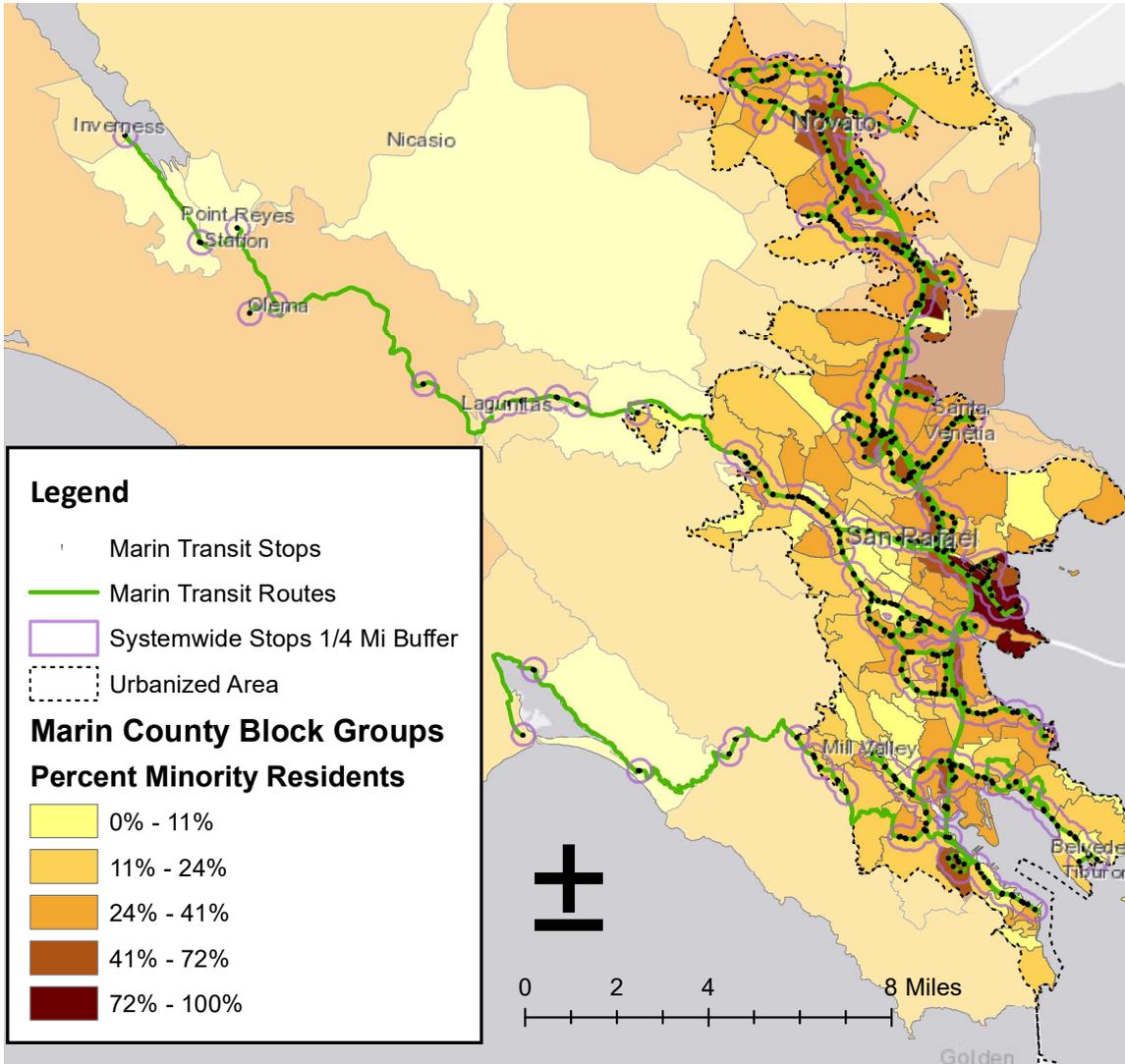
Cumulative Systemwide Analysis

The cumulative systemwide analysis forms the basis for concluding whether the proposed service changes will constitute a Disparate Impact or Disproportionate Burden.

The baseline systemwide demographics were calculated using the same methodology as the service area demographics above, using demographic information for all block groups within a ¼-mile radius of any Marin Transit bus stop. Figure 1 below shows the systemwide buffer used to calculate these demographics, with the percentage of residents belonging to minority groups shown underneath. Figure 2 shows the same with low-income residents. The final step of the Title VI analysis compares the service changes to these two numbers. The systemwide baseline is 31 percent minority residents and 16 percent low-income residents.



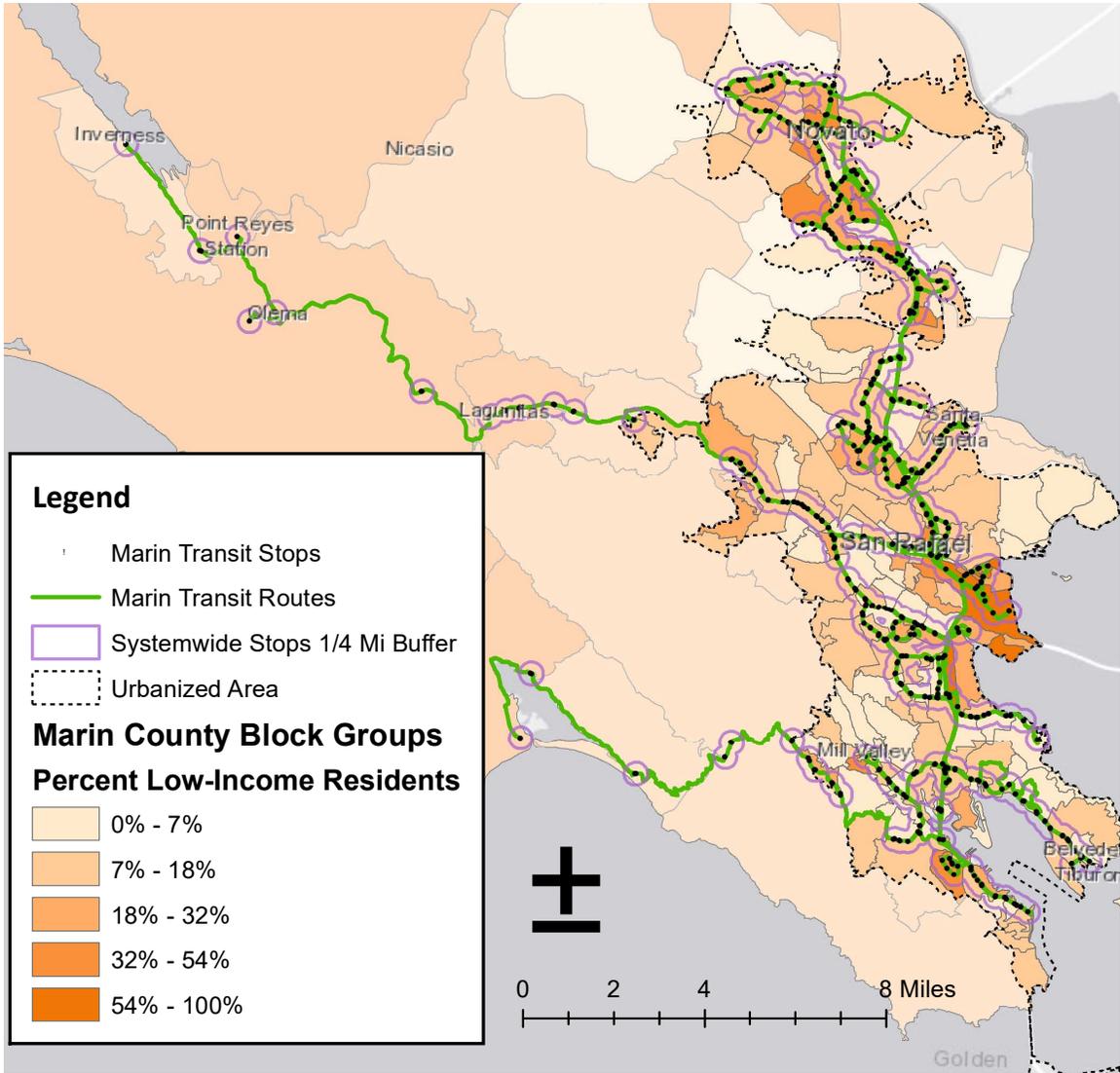
Figure 1: Systemwide Minority Residents by Block Group



Source (demographic data): American Community Survey 2021 5-Year Sample, Table B03002.



Figure 2: Systemwide Low-Income Residents by Block Group



Source (demographic data): American Community Survey 2021 5-Year Sample, Table C17002.

The systemwide baseline analysis does not take into account level of service in each neighborhood. The District’s fixed route service is concentrated in predominantly minority and low-income communities such as the Canal and Marin City, because this is where the highest ridership and demand for bus service is located. In the Canal, for example, bus service is offered every 15 minutes during peak periods on just Route 35, and between Routes 23 and 36, total service in the neighborhood is even higher most of the day. Meanwhile, in more rural areas such as Point Reyes and Bolinas, there can be an hour or more between buses. Since this



is not taken into account in the systemwide analysis, the baseline demographics likely underestimate the share of baseline service offered to minority and low-income populations.

Table 3 shows the results of step 2 above. The baseline systemwide demographics are included for comparison.

Table 3: Cumulative Assessment of Proposed Service Changes

	Total Hours	Minority Share (hours)	Low-Income Share (hours)	Percent Minority Share	Percent Low-Income Share
Cumulative Service Increase	17,036	5,850	3,018	34%	18%
Cumulative Service Decrease	22,903	8,713	4,212	38%	18%
Baseline Systemwide Demographics				31%	16%

Cummulative Service Increase

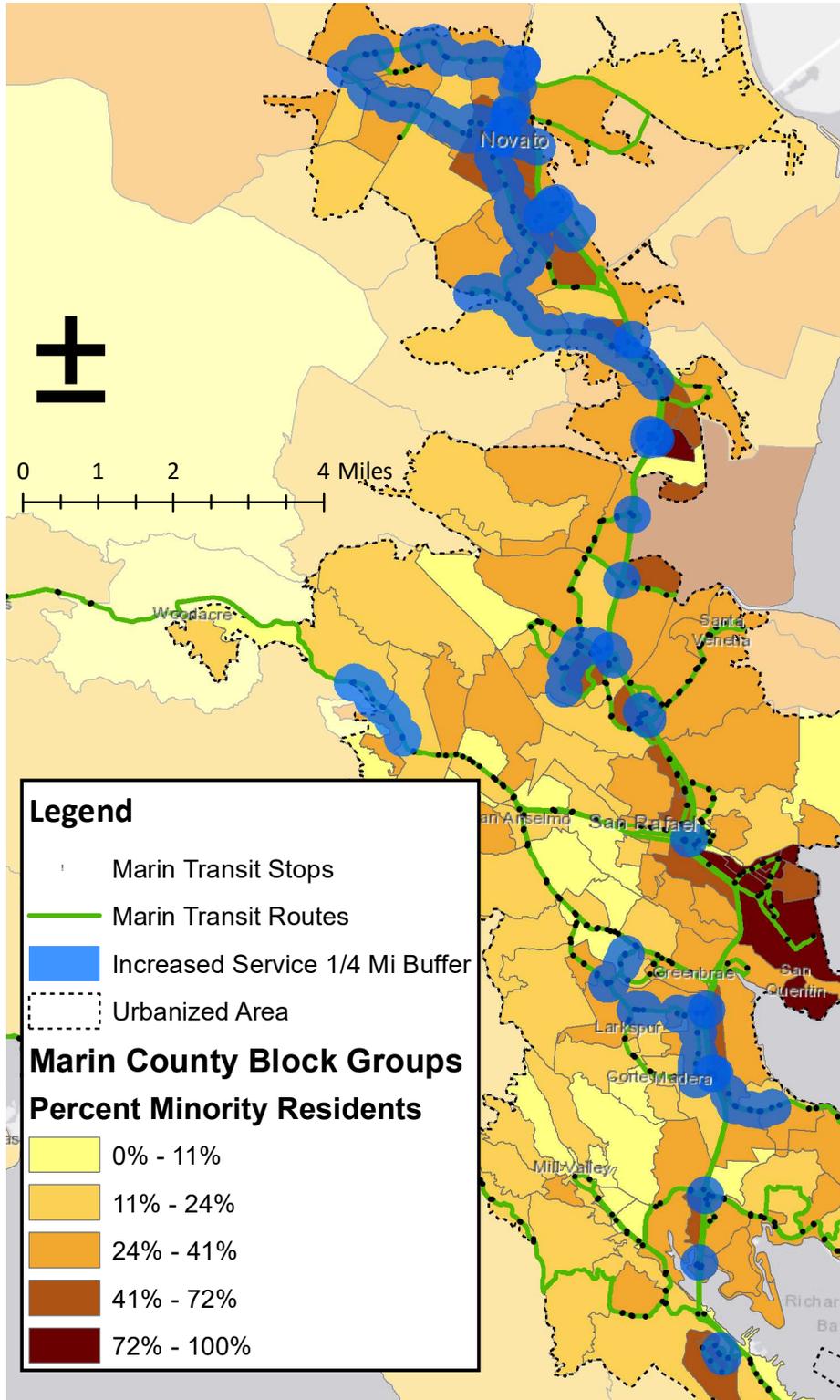
Figure 3 below shows the ¼-mile stop buffers for all of the increased service, systemwide, in the proposed service changes. This includes the proposed service increases on Routes 23, 29, 35, 49, 71 and 257.

As shown in Table 3, the minority share of the service increase will be 34 percent, compared to comprising 31 percent of the underlying service population. This is a difference of three percent, which is below the 20 percent threshold and does not constitute a Disparate Impact.

Similarly, the low-income share of the service increase will be 18 percent, compared to comprising 16 percent of the underlying service population. This is a difference of two percent, which is below the 20 percent threshold and does not constitute a Disproportionate Burden.



Figure 3: Systemwide Service Increases





Cummulative Service Decrease

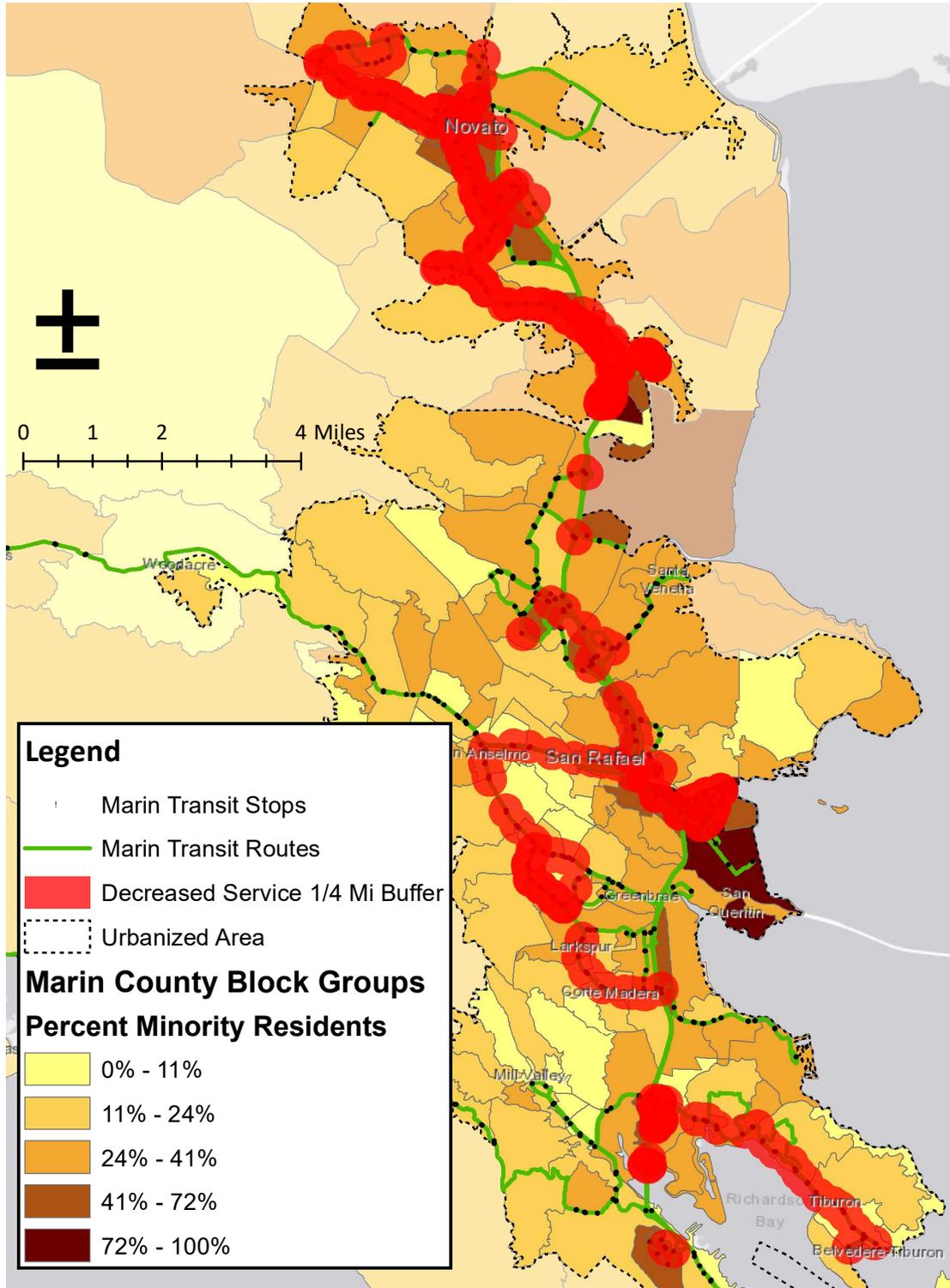
Figure 4 below shows the ¼-mile stop buffers for all of the decreased service, systemwide, in the proposed service changes. This includes the proposed service decreases on Routes 22, 29, 35, 49, 219, 251, 257, 645, and 651.

As shown in Table 3, the minority share of the service decrease will be 38 percent, compared to comprising 31 percent of the underlying service population. This is a difference of seven percent, which is below the 20 percent threshold and does not constitute a Disparate Impact.

Similarly, the low-income share of the service decrease will be 18 percent, compared to comprising 16 percent of the underlying service population. This is a difference of two percent, which is below the 20 percent threshold and does not constitute a Disproportionate Burden.



Figure 4: Systemwide Service Decreases





Other Analysis

These analyses are included for illustrative purposes only, to show the effects of the proposed service changes from multiple angles, and are not intended to fulfill FTA requirements under Title VI.

Route Level Analysis

The proposed service changes are intended to create operational efficiencies while minimizing the service level impacts on riders. To achieve this goal, for the most part, where routes were proposed for full cancellation, changes were made on other routes to provide substitute service. Routes proposed for segment cancellation were deconstructed, and the lost service was added to other routes. The table below shows how the routes proposed for service reduction or cancellation were replaced in other parts of the service change proposal.

Table 4: Route Level Service Replacements/Alternatives

	Proposed Reduction	Replacement / Alternative Service
Route 22	Northbound service to Strawberry; Evening service	<ul style="list-style-type: none"> Strawberry Service: Routes 17, 36, and proposed Route 219 Evening service (Marin City-Corte Madera): Routes 17 and 71 Evening service (Corte Madera-Larkspur): <i>No direct replacement / alternative</i> Evening service (San Rafael-San Anselmo): proposed Route 23, Route 228
Route 23x	Cancel Service	<ul style="list-style-type: none"> Consolidate with proposed Route 23
Route 29	Service to the Canal; Service along Sir Francis Drake/College west of Bon Air Road	<ul style="list-style-type: none"> Canal Service: Routes 35, 36, and proposed Route 23 Sir Francis Drake/College Service: Routes 22 and 228
Route 35	Service north of Northgate	<ul style="list-style-type: none"> Route 49, proposed Route 71 (see note), and proposed Route 257
Route 219/219f	Service to the hills, service frequency	<ul style="list-style-type: none"> <i>No direct replacement / alternative</i>
Route 251	Cancel Service	<ul style="list-style-type: none"> Service to San Marin: proposed Route 49 Novato service south of San Marin: proposed Route 257
Route 645	Cancel Service	<ul style="list-style-type: none"> Proposed Route 35
Route 651	Cancel Service	<ul style="list-style-type: none"> Proposed Routes 49 and 257

Note: In addition to the 1,000 hours of service to be added to Route 71 in this proposal, an additional 9,000 annual hours were added to Route 71 in June of 2021.



All service decreases are being countered with service increases on other routes or alternative service on existing routes with two exceptions: Routes 22 and 219/219f. Table 5 below shows the route level assessment and estimated burden on minority and low-income populations. Routes 22 and 219/219f are both below the threshold for disparate impact and disproportionate burden.

Table 5: Route Level Service Assessment

	Total Hours (net)	Minority Impact (hours)	Low-Income Impact (hours)	Percent Minority Impact	Percent Low-Income Impact
Route 22	-1,280	-342	-178	27%	14%
Route 23/23x	839	144	142	17%	17%
Route 29 (see note)	463	-22	-43	-5%	-9%
Route 35	-5,628	-2,366	-1,074	42%	19%
Route 49	2,920	849	409	29%	14%
Route 71	2,346	891	455	38%	19%
Route 219/219f	-1,410	-321	-142	23%	10%
Route 251	-9,509	-3,681	-1,813	39%	19%
Route 257	6,703	2,600	1,373	39%	20%
Route 645	-689	-372	-201	54%	29%
Route 651	-622	-243	-122	39%	20%

Note: Although the route-wide change in service hours on Route 29 is net positive, the net change in hours for minority and low-income residents is negative.

Neighborhood Level Analysis

The net impact of the proposed service changes on individual riders and residents can best be understood at the neighborhood level.

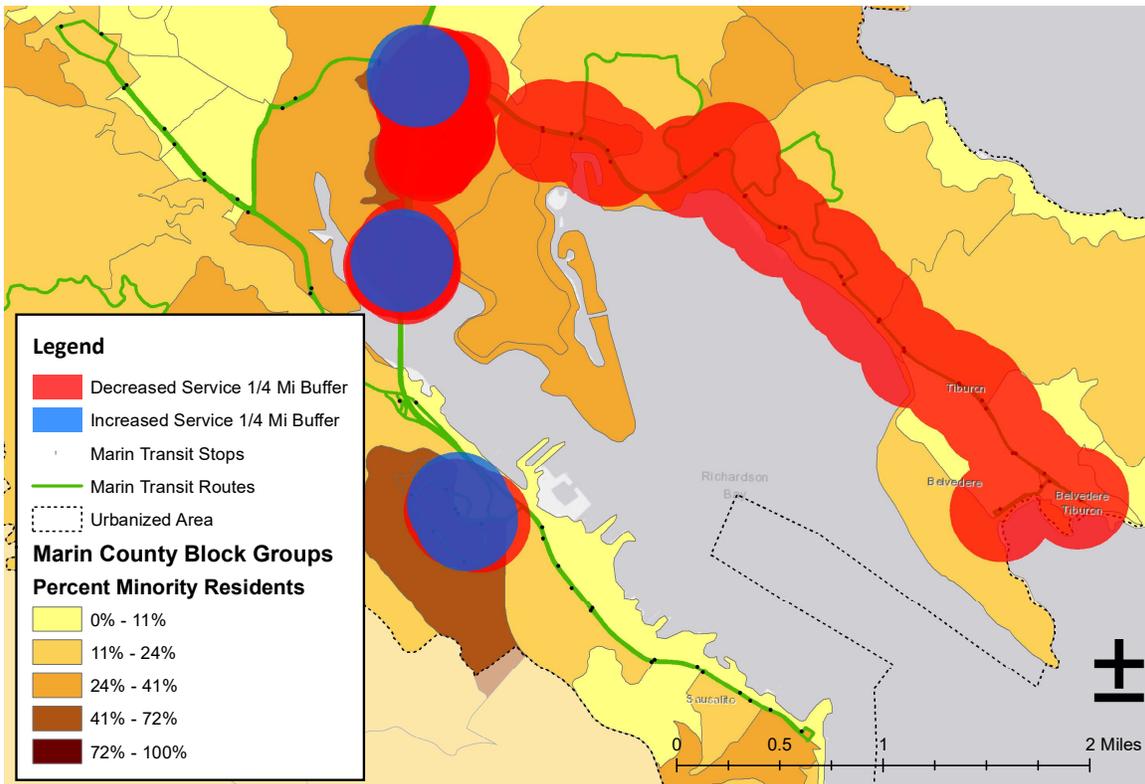
The maps in this section show service increases in blue and decreases in red. Note that these colors only show the direction of the service change (increase/decrease), and do not indicate the scale of the proposed change. Service changes on multiple routes in the same location may layer on top of each other and appear more vivid, but the scale of this change may be less than a single change on a different route.



Tiburon/Strawberry/Marin City

Figure 5 below shows the proposed service increases and decreases in Tiburon, Strawberry, and Marin City. Service reductions on Route 219/219f, with no replacement service, mean that Tiburon will receive a net service reduction. Removing the Strawberry stops from Route 22 in the northbound direction, along with reducing late night service on Route 22, will mean that the Strawberry stops have a slight reduction in service (note that the majority of service to these stops occurs on Route 36, which will be unaffected by the proposed service change). Increased service on Route 71 will lead to a net service increase at the Highway 101 bus pads in this area (Tiburon Wye and Seminary Dr), along with the Marin City hub.

Figure 5: Tiburon/Strawberry/Marin City Proposed Service Changes

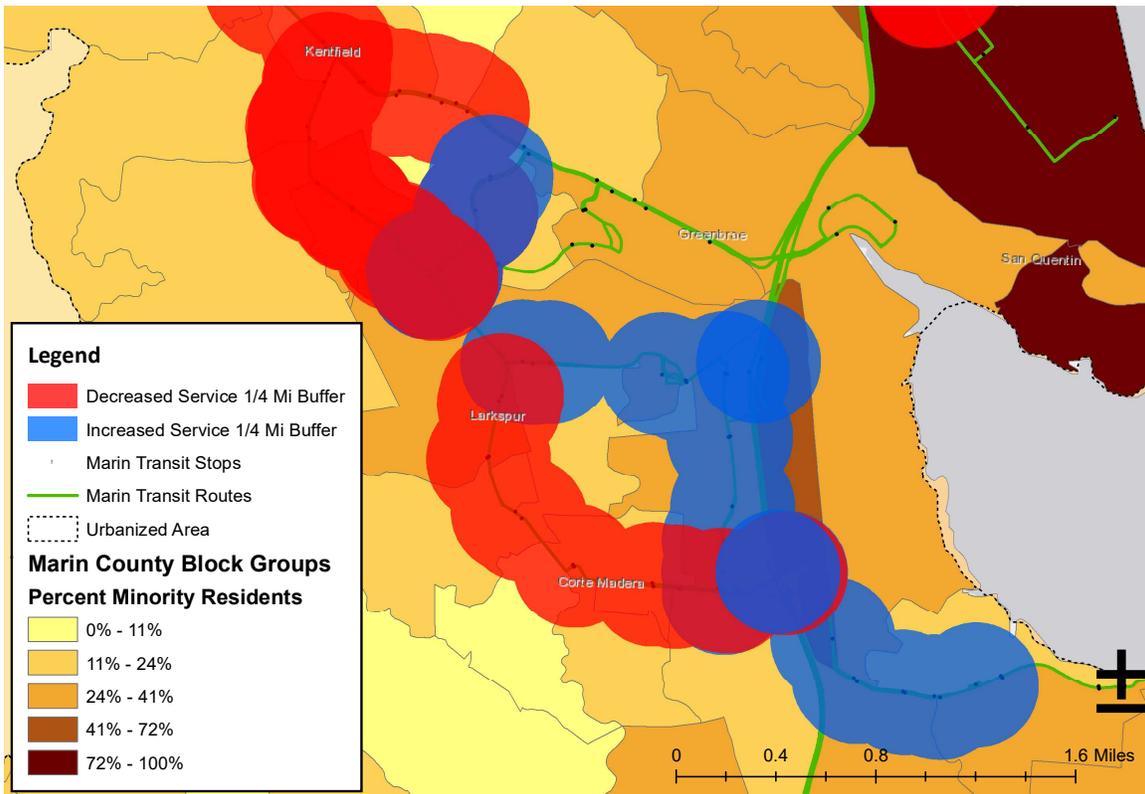




Corte Madera/Larkspur/Kentfield

Figure 6 below shows the proposed service increases and decreases in Corte Madera, Larkspur, and Kentfield. The route change on Route 29 will mean a reduction in service for the Kentfield/College of Marin loop during peak hours, but an increase in service along the corridor shown in blue into Corte Madera. Peak hour service to Kentfield/College of Marin will continue on Routes 22 and 228. The reduction in late night service on Route 22 will mean a reduction in service after 8:00 pm in this area. Increased service on Route 71 will increase the frequency of service on the Highway 101 bus pads in this area (Lucky Dr and Tamalpais/Paradise Dr).

Figure 6: Corte Madera/Larkspur/Kentfield Proposed Service Changes





The Canal

Between the change on Route 29 and the cancellation of Route 645, the Canal will receive a decrease in service as part of the proposed service changes. However, the proposed cut is fairly small, and the Canal currently has the highest level of bus service of any neighborhood in Marin County. The proposed changes would represent a 5.8% reduction in weekday trips to the Canal and no reduction in weekend service, as shown in Table 6 and Table 7 below. The reduction will occur primarily during peak hours only, when remaining service combines to offer roughly eight-minute headways in the neighborhood. All trips to and from the Canal will still be possible, although trips between the Canal and Novato or Marin General will now require a (timed) transfer at the San Rafael Transit Center. There will be no impact to the span of service to the Canal.

Table 6: Weekday Bus Service in the Canal

Route	Trips per Day (current)	Trips per Day (proposed)
23	17	25
23x	6	0
29	7	0
35	59	59
36	29	29
645	2	0
Total	120	113

Table 7: Weekend Bus Service in the Canal

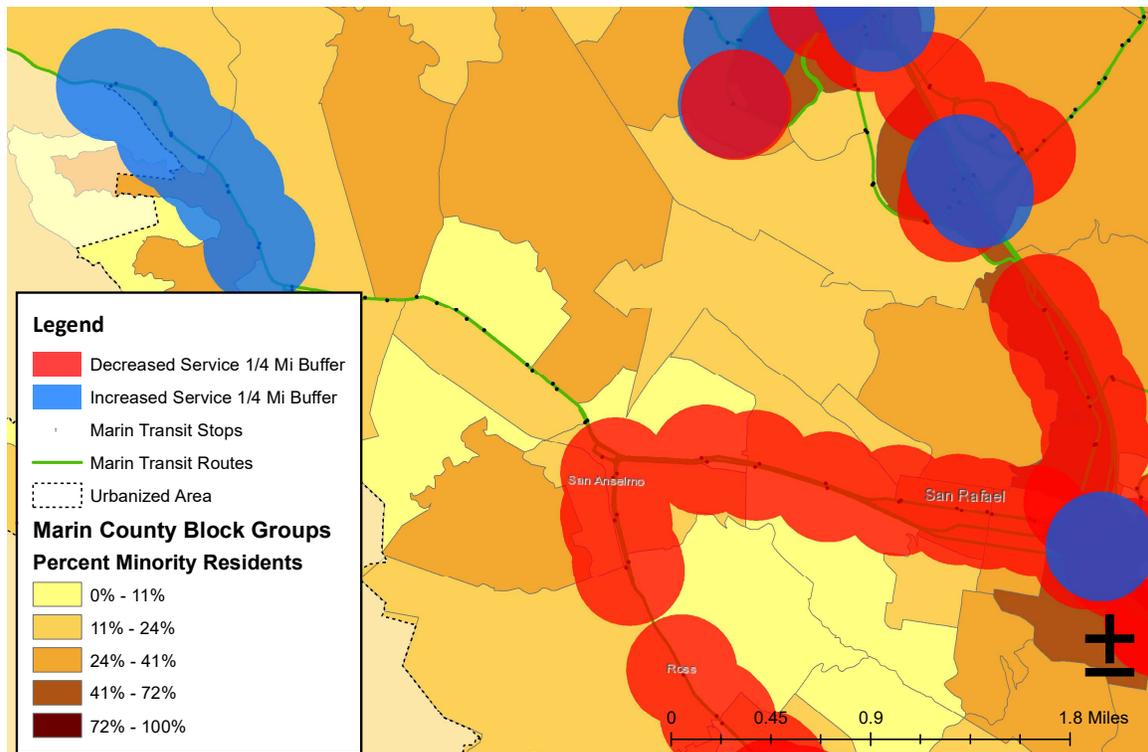
Route	Trips per Day (current)	Trips per Day (proposed)
23	15	15
35	43	43
36	23	23
Total	81	81



Downtown San Rafael/San Anselmo/Ross/Manor

Figure 7 below shows the proposed service increases and decreases in Downtown San Rafael, San Anselmo, Ross, and Manor. Note that Santa Venetia and Terra Linda are discussed in the next section. The reduction in late night service on Route 22 will mean a slight reduction in service along the Fourth St/Red Hill Ave corridor in San Rafael into San Anselmo, and then along Sir Francis Drake Blvd into Ross. Note that Routes 23 and 68 will continue to provide late night service along Fourth St/Red Hill Ave. The cancellation of Route 645 will mean a slight reduction in service along Lincoln Ave, although service along Lincoln Ave is primarily provided by Routes 35, 233, and 257. The extension of Route 23 will increase service into Manor, and increased service on Route 71 will increase service to the San Rafael Transit Center. Overall service at the San Rafael Transit Center will remain roughly the same, with the increase in midday service on Route 71 and decrease in late night service on Route 22 both being relatively minor.

Figure 7: Downtown San Rafael/San Anselmo/Ross/Manor Proposed Service Changes

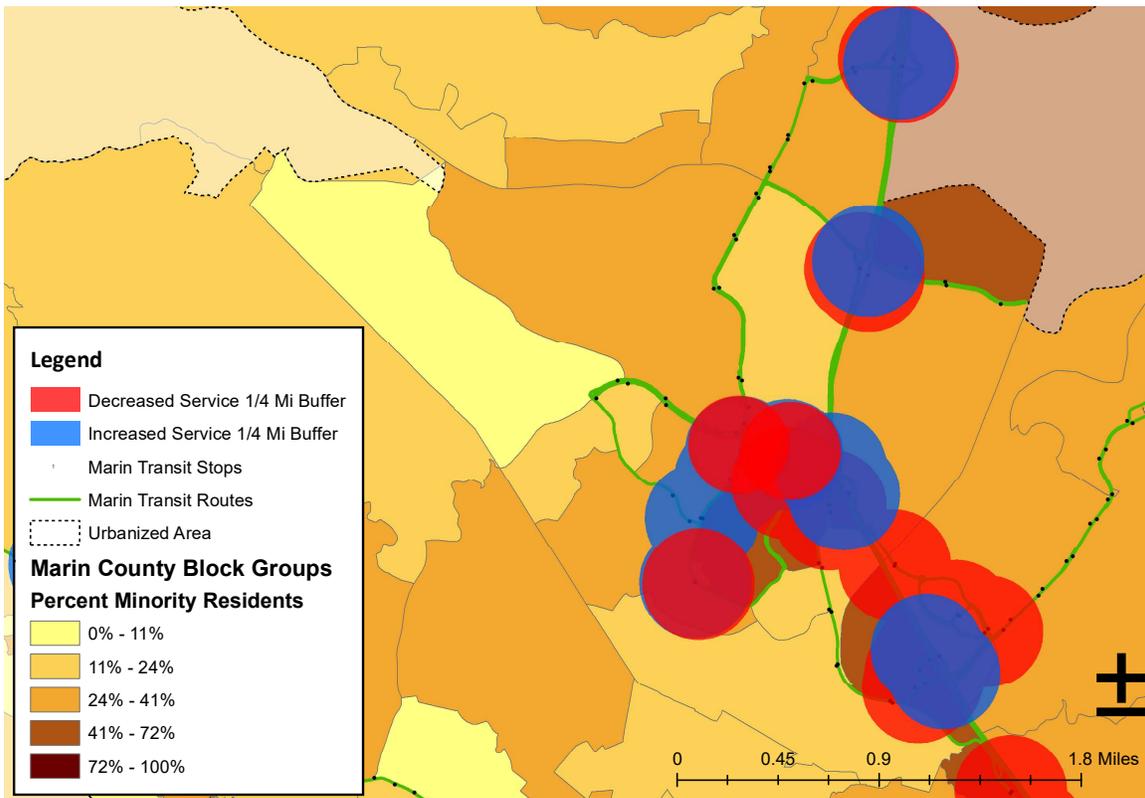




Santa Venetia/Terra Linda/Marinwood

Figure 8 below shows the proposed service increases and decreases in Santa Venetia, Terra Linda, and Marinwood. The cancellation of Route 645 will mean a slight reduction in service to the Marin Civic Center area; note that service to that neighborhood is primarily provided by Routes 35, 49, and 233, and the N San Pedro Rd bus pads will increase in service as part of Route 71's increase. Terra Linda will also see a slight reduction due to the cancellation of Route 645 and Route 49 no longer serving Nova Albion/Las Gallinas, but this reduction will be more than compensated for by the increase in service due to the rerouting of Route 35 into Terra Linda. The Terra Linda bus pads will also see an increase in service on Route 71. Bus pads in this area (Smith Ranch/Lucas Valley Rd and Marinwood) will see service switch from Route 35 to Route 71, which will entail a slight reduction in frequency.

Figure 8: Santa Venetia/Terra Linda/St Vincent Proposed Service Changes





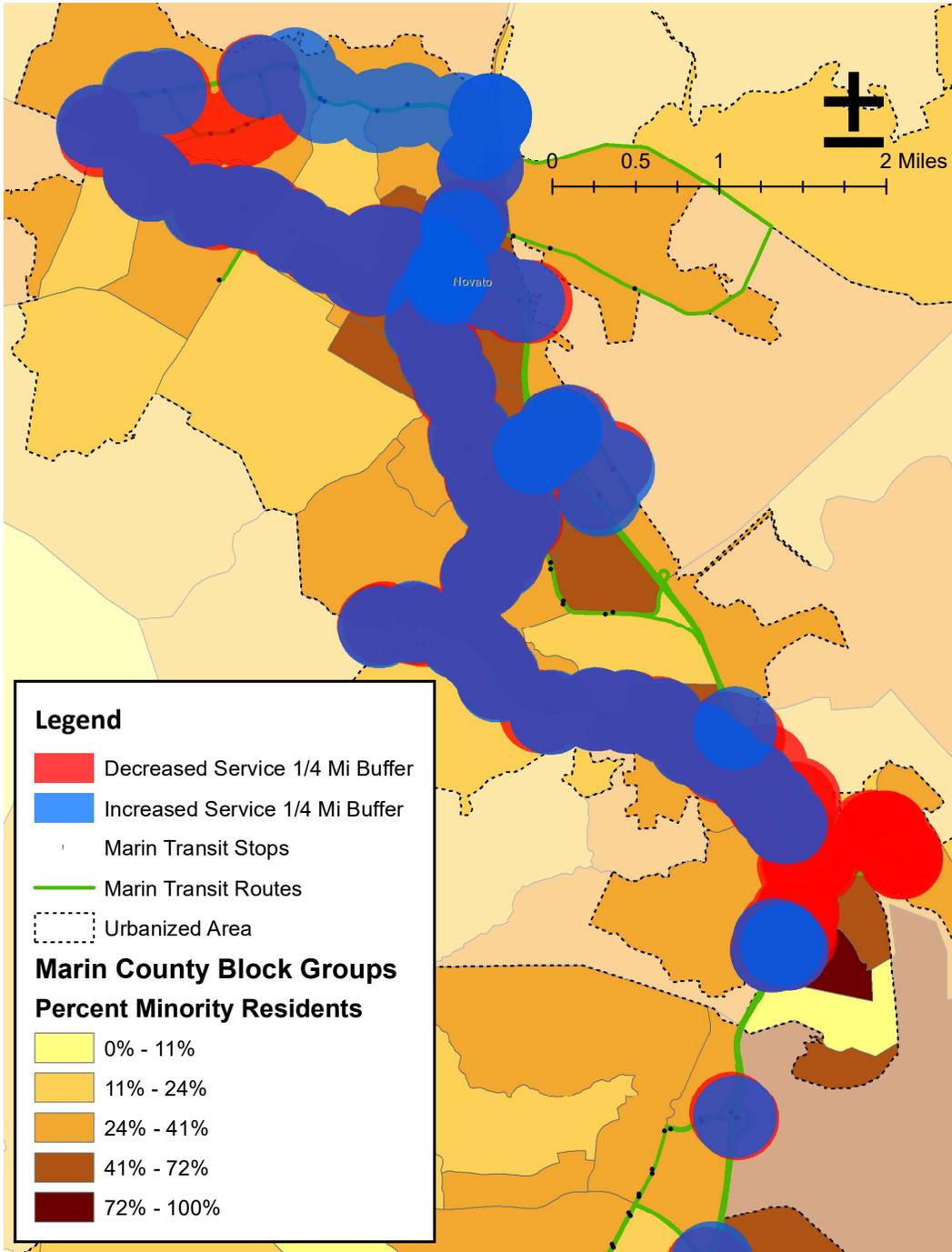
Novato

Figure 9 below shows the proposed service increases and decreases in Novato. The bus pads along Highway 101 will see a shift in service from Route 35 to Route 71, which will entail a slight reduction in frequency. The Hamilton neighborhood will see a slight decrease in service during weekday midday times due to the cancellation of Routes 251 and the re-routing of Route 257. Note that primary service to this neighborhood is on Route 49, which will remain unchanged, and Route 257 short trips will continue serving Hamilton as well. The Ignacio Blvd corridor from Hamilton to Indian Valley Campus, along with the Sunset Pkwy/S Novato Blvd corridor from Indian Valley Campus to Downtown Novato, will see a roughly even shift of service from Route 251 to the new added service and route extension on Route 257. There will be a slight decrease in total service along this corridor due to the cancellation of Route 651 and route consolidation along the Ignacio Blvd portion of the corridor.

Redwood Blvd between Grant Ave and the San Marin SMART station will see service shift from Routes 35 and 49 to Routes 71 and 257, which will entail a slight reduction in service; note that Route 71 terminates at Olive Ave (where Route 35 currently terminates as well). The San Marin neighborhood will see service shift from Routes 251 and 651 to Route 49, which will result in a net increase in service, especially along San Marin Dr east of San Carlos Way. Note that the stops on San Carlos Way will lose service and riders will now need to walk up to a half mile to access service along San Marin Dr. It should also be noted that riders traveling between San Marin and Vintage Oaks will now need to make a transfer in Downtown Novato or at the San Marin SMART station to complete this trip.



Figure 9: Novato Proposed Service Changes





Conclusion

As demonstrated above, the proposed service change package does not constitute a Disparate Impact on minority populations or a Disproportionate Burden on low-income populations under Title VI. District staff carefully formulated the service change proposal to ensure that, to the greatest extent possible, any service being cut from one route would be replaced by added service on another route. The data backs this up.

This analysis only looks at the demographic and service data to ensure that the impact of the proposed changes will not be disparately or disproportionately targeted towards minority or low-income populations. The public comments received as part of the public outreach process are not analyzed in this report, but can be found in Appendixes B and C. This report should be considered alongside the public comment received; it does not supersede it.