



Title VI Program Update

2023-2026

Adopted by Marin Transit Board of Directors

June 2023

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1. Introduction

Marin Transit is committed to ensuring that no person is excluded from participation in, denied the benefits of, or discriminated against under its projects, programs, or activities on the basis of race, color, creed, national origin, sex or age, as provided in Title VI of the Civil Rights Act and 49 United States Code Section 5332. The Marin Transit Title VI Program addresses both the general and transit-specific requirements per Federal Transit Administration (FTA) Title VI guidance issued on October 1, 2012 (Appendix A of FTA circular 4702.1B).

Overview of Marin Transit

Marin County Transit District (Marin Transit or the District) was formed by a vote of the people of Marin County in 1964 and was given the responsibility for providing local transit service within Marin County. Although Marin Transit has responsibility for local transit services, it does not employ its own drivers. Instead, Marin Transit contracts with public, private, and nonprofit providers for local bus and paratransit services and maintenance. Staff are directly responsible for planning, capital investments, financial management, and operations oversight. Marin Transit is financially supported by Marin County Measure AA Funds, State Transportation Development Act Funds, fares, property taxes and Federal Section 5311 rural transit funds. Marin Transit services encompass all public bus routes that begin and end within Marin County.

Marin Transit offers services under the following broad categories:

- Traditional local fixed route service operated in high-capacity transit vehicles on major travel corridors.
- Community shuttle service operated in smaller vehicles and tailored to serve lower density neighborhoods.
- Rural fixed route service providing a link between rural west Marin County and the major activity centers in the county.
- Muir Woods Shuttle – a service operated in partnership with the National Park Service to relieve congestion around the Muir Woods National Monument.
- School services, offered through Supplemental transit routes and a dedicated home to school yellow school bus service.
- Demand-response paratransit services for those eligible under the Americans with Disabilities Act (ADA).
- Specialized services and programs for the older adult and disability community through its Marin Access program.

In addition, the District utilizes over 600 bus stops in Marin County that serve regional and/or local bus routes. While Marin Transit does not own any of these bus stops, it shares responsibility for maintaining and improving most stops throughout the County.

Overview of Title VI Program

The commitment to comply with Title VI is an essential element of Marin Transit’s service operation. Marin Transit’s Title VI Program will continue to evolve through lessons learned while conducting planning analyses, evaluating service impacts, and putting into place inclusive participation programs and outreach activities. Every three years, Marin Transit updates this document for the Federal Transit Administration as a record of the District’s most current Title VI Program.

The efforts associated with updating the Language Assistance Plan and the Public Participation Plan that fed into this program have assisted the District in developing strategies and practices that will continue to ensure on-going compliance with Title VI principles. These include:

1. Updated Language Assistance Plan and Public Participation Plans that focus on improving upon and integrating language assistance measures into day-to-day activities.
2. Developing staff training materials and practices to ensure that staff and contracted staff are familiar with Title VI requirements, policies, and procedures.
3. Updating Title VI materials and agency vital documents to include expanded safe harbor languages including Vietnamese and Chinese (Written Simplified Chinese).¹
4. Continuing to ensure that all federal compliance activities, including Title VI, are included in future work plans.

¹ Based on a census-based analysis of languages spoken by Limited English Proficient (LEP) populations, Marin Transit found that Chinese (including Mandarin and Cantonese speakers) should be included for translation services, as Chinese is spoken by greater than 1,000 LEP individuals in the county and rises to the level of a “safe harbor” language under federal guidelines. Due to the greater prevalence of Mandarin speakers in Marin County, documents will be translated into Simplified Chinese which is the written form of Mandarin.

2. Title VI Notice to Beneficiaries

Marin Transit District provides a Title VI notice to beneficiaries in key locations including the District's administrative offices, the District's contractor offices that are open to the public, on the Marin Transit website, on Marin Transit vehicles, and at major transit hubs. With this update of the Title VI Program, text of the notice has been revised to include the new safe harbor languages of English, Spanish, Vietnamese, and Chinese (Written Simplified Chinese). Marin Transit will update this Notice in all relevant locations upon adoption of this updated Title VI Program.

English

Marin Transit Passenger – Non-Discrimination Policy

Marin Transit grants all citizens equal access to transportation services and is committed to ensuring that no person is excluded from participation in 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 of 1964. For more information on our Title VI program or how to file a complaint, contact (415) 226-0855 or TDD 711, email info@marintransit.org or visit our offices at 711 Grand Avenue, Suite 110, San Rafael, CA 94901.

For more information about Marin Transit's Title VI program, please visit www.marintransit.org/titlevi or call (415) 226-0855 or TDD 711.

If information is needed in another language, contact Marin Transit at (415) 226-0855.

Spanish

Pasajero de Marin Transit - Política de no discriminación

Marin Transit otorga a todos los ciudadanos la igualdad de acceso a sus servicios de transporte. Marin Transit tiene el compromiso de garantizar que ninguna persona sea excluida de participar o que se le nieguen los beneficios de sus servicios sobre la base de raza, color u origen nacional, según se proteja por el Título VI de la Ley de Derechos Civiles de 1964. Para obtener más información sobre nuestro programa Título VI o cómo presentar una queja, comuníquese con (415) 226-0855 o TDD 711, envíe un correo electrónico a info@marintransit.org o visite nuestras oficinas en 711 Grand Avenue, Suite 110, San Rafael, CA 94901.

Para obtener más información sobre el programa Título VI de Marin Transit, visite <http://www.marintransit.org/titlevi> o llame al (415) 226-0855 o TDD 711.

Si necesita información en otro idioma, comuníquese con Marin Transit al (415) 226-0855.

Vietnamese

Hành khách sử dụng xe buýt Marin Transit – Chính sách không phân biệt đối xử

Marin Transit cho phép mọi công dân tiếp cận bình đẳng với các dịch vụ vận chuyển và cam kết đảm bảo rằng không ai bị loại trừ khỏi việc tham gia hoặc bị từ chối các lợi ích từ các dịch vụ của Marin Transit trên cơ sở chủng tộc, màu da hoặc nguồn gốc quốc gia như được bảo vệ bởi Tiêu đề VI của Đạo luật về Quyền Công dân năm 1964. Để biết thêm thông tin về chương trình Tiêu đề VI của chúng tôi hoặc cách nộp đơn khiếu nại, hãy liên lạc với số điện thoại (415) 226-0855 hoặc TDD 711, hoặc truy cập vào info@marintransit.org hoặc đến văn phòng của chúng tôi tại 711 Grand Avenue, Suite 110, San Rafael, CA 94901.

Để biết thêm thông tin về chương trình Tiêu đề VI của Marin Transit, vui lòng truy cập vào <http://www.marintransit.org/titlevi> hoặc gọi (415) 226-0855 hoặc TDD 711.

Nếu cần thông tin bằng ngôn ngữ khác, hãy liên lạc với Marin Transit theo số (415) 226-0855.

Chinese (Written Simplified Chinese)

馬林縣公共交通乘客–非歧視政策

馬林縣公共交通(Marin Transit)致力於確保所有公民都能平等獲得公交服務，並承諾不會因種族、膚色或原國籍而排除任何人參與或享受其服務的權益，這些權益受到《1964年民權法案》(Civil Rights Act of 1964)第六章(Title VI)的保護。如需了解有關我們的第六章計劃或如何提出投訴的更多信息，請通過以下方式聯繫我們：致電(415) 226-0855 或 TDD 711，發電郵至 info@marintransit.org，或者親臨我們辦公室（地址是711 Grand Avenue, Suite 110, San Rafael, CA 94901）。

如需了解有關馬林縣公共交通(Marin Transit)第六章計劃的更多信息，請訪問 <http://www.marintransit.org/titlevi>，或者致電(415) 226-0855 或TDD 711。

如需其他語言的信息，請致電Marin Transit (415) 226-0855。

3. Title VI Complaint Procedures and Complaint Form

As a recipient of federal dollars, Marin Transit is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a nondiscriminatory basis. Marin Transit has developed a Title VI Complaint Procedure that outlines a process for the disposition of Title VI complaints and is consistent with guidelines found in the FTA Circular 4702.1B.

The following Complaint Procedure is posted on the www.marintransit.org website:

Title VI Complaint Procedure

If you believe that you have received discriminatory treatment by Marin Transit on the basis of your race, color, or national origin, you have the right to file a complaint with the Civil Rights Officer. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident. This document and the Title VI complaint form are available on Marin Transit website www.marintransit.org/titlevi.html

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and send it to:

Civil Rights Officer
Marin Transit
711 Grand Avenue, Suite 110
San Rafael, CA 94901

Verbal complaints will be accepted and transcribed by the Civil Rights Officer. To make a verbal complaint, call (415) 226-0855 or TDD 711.

You also have the right to file a complaint with an external entity such as the Department of Transportation (DOT), a federal or state agency, or a federal or state court. Should a complaint be filed with Marin Transit and an external entity simultaneously, the external complaint shall supersede Marin Transit complaint and Marin Transit's complaint procedures will be suspended pending the external entity's findings.

The Marin Transit Civil Rights Officer will review and investigate all Title VI complaints that are complete. Once the complaint is received, Marin Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. Reasonable measures will be undertaken to preserve any information that is confidential. The investigation may include a review of all relevant documents, practices and procedures as well as discussion(s) of the complaint with all affected parties to determine the nature of the problem. The investigation will be conducted and generally completed within 60 days of receipt of a formal complaint.

Based on the information received, an investigation report will be prepared by the Civil Rights Officer for submittal to the Marin Transit General Manager. On behalf of the General Manager, the Civil Rights Officer will issue one of two letters to the complainant: 1) a closure letter or a 2) a Letter of Finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the

case will be closed. A Letter of Finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. Parties will have 14 calendar days from the date of the outcome letter to appeal. If the complainant wishes to appeal the decision, he or she may appeal directly to the United States Department of Transportation, the Equal Employment Opportunity Commission or the California Department of Fair Employment and Housing, as appropriate.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Investigation Procedures

The Civil Rights Officer will maintain a log of Title VI complaints received that shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken by Marin Transit in response to the complaint.

If requested, documents describing Marin Transit's Title VI Policy Statement and Complaint Procedures can be translated into languages other than English.

Title VI Complaint Forms

Marin Transit provides Title VI Complaint Forms in English, Spanish, Vietnamese and Chinese (Written Simplified Chinese), as shown below.

Figure 1 Title VI Complaint Form-English

Marin Transit Title VI Complaint Form

Marin Transit is committed to ensuring that no person is excluded from participation in, 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 of 1964, as amended ("Title VI").

Please provide the following information necessary in order to process your Title VI complaint. Assistance is available upon request.

1. Complainant's Name _____
2. Address _____
3. City, State and Zip Code _____
4. Telephone Number (home) _____ (business) _____
5. Electronic Mail Address _____
6. Accessible Format Requirements? Large Print Audio Tape
 a. TDD Other
7. Person discriminated against (if someone other than the complainant)
 Name _____
 a. Address _____
 b. City, State and Zip Code _____
8. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:
 a. Race _____
 b. Color _____
 c. National Origin _____
9. What date did the alleged discrimination take place? _____

10. In your own words, describe the alleged discrimination. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. Include the date of the encounter, the route number and direction of travel, and the time the incident occurred. If you have it, include the bus number. Please use the back of this form if additional space is required

11. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? _____ Yes _____ No

12. If yes, check all that apply: _____ Federal agency _____ Federal court _____ State agency _____ State court _____ Local agency

13. Please provide information about a contact person at the agency/court where the complaint was filed.

Name _____
Address _____
City, State, and Zip Code _____
Telephone Number _____

14. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature Date

Mail or Deliver the Completed Form to:

Civil Rights Officer
Marin Transit
711 Grand Avenue, Suite 110
San Rafael, CA 94901

10. En sus propias palabras, describa la presunta discriminación. Explique lo más claramente que pueda lo que pasó y por qué cree usted que le discriminaron. Describa todas las personas que estaban involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que le discriminaron (si se los sabe) así como los nombres y la información de contacto de los testigos que hubiera. Incluya la fecha del incidente, el número de la ruta y la dirección del viaje, y la hora en que ocurrió el incidente. Incluya el número de autobús si lo tiene. Por favor, use la parte de atrás de este formulario si necesita más espacio

11. ¿Ha presentado esta queja con otra agencia federal, estatal o local, o ante alguna corte federal o estatal? Sí No

12. Si es así, marque todas las que apliquen: Agencia federal Corte federal
 Agencia estatal Corte estatal Agencia local

13. Por favor proporcione la información de contacto de una persona en la agencia o corte donde se presentó la queja.

Nombre _____
Dirección _____
Ciudad, estado, código postal _____
Número telefónico _____

14. Por favor firme abajo. Puede adjuntar cualquier material escrito u otra información que crea pertinente para su queja.

Firma de la persona que presenta la queja Fecha

Envíe o entregue el formulario llenado a:

Civil Rights Officer
Marin Transit
711 Grand Avenue, Suite 110
San Rafael, CA 94901

Figure 3 Title VI Complaint Form - Vietnamese

Mẫu Đơn Khiếu nại Tiêu đề VI của Marin Transit

Marin Transit cam kết đảm bảo rằng không ai bị loại trừ khỏi việc tham gia hoặc bị từ chối các lợi ích của các dịch vụ của mình trên cơ sở chủng tộc, màu da hoặc nguồn gốc quốc gia như được bảo vệ bởi Tiêu đề VI của Đạo luật Dân quyền năm 1964, như đã được sửa đổi ("Tiêu đề VI").

Vui lòng cung cấp thông tin cần thiết sau đây để giải quyết khiếu nại Tiêu đề VI của bạn. Trợ giúp điền đơn có sẵn theo yêu cầu.

1. Tên Người Khiếu nại _____
2. Địa chỉ _____
3. Thành phố, Tiểu bang, Mã Zip _____
4. Số điện thoại (nhà) _____ (số) _____
5. Địa chỉ email _____
6. Đòi hỏi Dạng thức Tiếp cận? Chữ in to Bảng âm thanh
a. TDD Khác
7. Người bị phân biệt đối xử (nếu không phải là người khiếu nại)
Tên _____
a. Địa chỉ _____
b. Thành phố, Tiểu bang, Mã Zip _____
8. Điều nào sau đây mô tả đúng nhất lý do bạn tin rằng sự phân biệt đối xử đã diễn ra? Có phải vì:
a. Chủng tộc _____
b. Màu da _____
c. Nguồn gốc Quốc gia _____
9. Hành vi phân biệt đối xử bị cáo buộc diễn ra vào ngày nào? _____

10. Bằng ngôn từ của riêng bạn, hãy mô tả sự phân biệt đối xử bị cáo buộc. Giải thích càng rõ ràng càng tốt điều gì đã xảy ra và tại sao bạn tin rằng mình bị phân biệt đối xử. Mô tả tất cả những người có liên quan. Bao gồm tên và thông tin liên lạc của (những) người đã phân biệt đối xử với bạn (nếu biết) cũng như tên và thông tin liên lạc của bất cứ nhân chứng nào. Bao gồm ngày xảy ra vụ việc, số tuyến đường và hướng di chuyển cũng như thời gian xảy ra vụ việc. Nếu bạn có nó, bao gồm số xe buýt. Vui lòng sử dụng mặt sau của mẫu này nếu cần thêm chỗ.

11. Bạn đã nộp đơn khiếu nại này với bất cứ cơ quan liên bang, tiểu bang hoặc địa phương nào khác chưa; hoặc với bất cứ tòa án liên bang hoặc tiểu bang nào khác chưa?
_____ Có _____ Không

12. Nếu có, hãy đánh dấu vào tất cả các mục phù hợp: _____ Cơ quan liên bang _____ Tòa án liên bang _____ Cơ quan tiểu bang _____ Tòa án tiểu bang _____ Cơ quan địa phương

13. Vui lòng cung cấp thông tin về người liên hệ tại cơ quan/tòa án nơi nộp đơn khiếu nại.

Tên _____
Địa chỉ _____
Thành phố, Tiểu bang, Mã Zip _____
Số điện thoại _____

14. Vui lòng ký tên bên dưới. Bạn có thể đính kèm bất cứ tài liệu bằng văn bản hoặc thông tin nào khác mà bạn cho là có liên quan đến khiếu nại của mình.

Chữ ký Người Khiếu nại _____ Ngày _____

Gửi qua đường bưu điện hoặc gửi Mẫu đã điền về:

Civil Rights Officer
Marin Transit
711 Grand Avenue, Suite 110
San Rafael, CA 94901

Marin Transit Title VI 投訴表

Marin Transit 致力於確保任何人都不會因種族、膚色或原國籍而被排除在其服務之外，或被剝奪其服務權益，這些權益受到《1964 年民權法案》(Civil Rights Act of 1964) 第六章 (Title VI) 修正案的保護。

請提供以下必要信息，以便處理您的 Title VI 投訴。可應要求提供協助。

1. 投訴人姓名 _____
2. 地址 _____
3. 城市、州和郵政編碼 _____
4. 電話號碼 (家) _____ (公司) _____
5. 電子郵件地址 _____
6. 無障礙格式要求？ 大字體 錄音帶
 a. TDD 其他
7. 被歧視者 (如果是投訴人以外的人)
 姓名 _____
 a. 地址 _____
 b. 城市、州和郵政編碼 _____
8. 以下哪一項最能描述您認為發生歧視的原因？是因為您的：
 a. 種族 _____
 b. 膚色 _____
 c. 原國籍 _____
9. 指控歧視發生的日期？ _____

10. 請用您自己的話來描述所指控的歧視情況。請盡可能清楚地說明發生了什麼，以及您認為自己受到歧視的原因。請描述所有的涉及人員，包括歧視您的人的姓名和聯繫信息（如果知道），以及任何證人的姓名和聯繫信息。請提供事件發生的日期、路線編號和行進方向，以及發生的時間。如果您記得，請提供公交車號碼。如果需要更多空間，請使用此表格的背面。

11. 您是否已向任何其他聯邦、州或地方機構，或者任何聯邦或州法院提交了該投訴？
_____ 是 _____ 否

12. 如回答是，請勾選所有適用項： _____ 聯邦機構 _____ 聯邦法院 _____ 州機構
_____ 州法院 _____ 地方機構

13. 請提供有關提出投訴的機構/法院的聯繫人信息。

姓名 _____
地址 _____
城市、州和郵政編碼 _____
電話號碼 _____

14. 請在下面簽名。您可以附上任何您認為與投訴相關的書面材料或其他信息。

投訴人簽名 日期

將填妥的表格郵寄或遞交至：

Civil Rights Officer
Marin Transit
711 Grand Avenue, Suite 110
San Rafael, CA 94901

4. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

There have been no specific Title VI investigations, complaints or lawsuits that have been filed against Marin Transit between May 1, 2020 and March 31, 2023. Title VI complaints, if any, are tracked via the District’s centralized feedback repository, TransTrack. Complaints are reviewed internally by the District’s Civil Rights Officer and summarized on an annual basis in the following format, as presented in Table 1.

Table 1 Title VI investigations, complaints, and lawsuits summary form (none for this period)

| | Date (Month, Day, Year) | Summary (include basis of complaint: race, color, or national origin) | Status | Action(s) Taken |
|-----------------------|-----------------------------------|--|---------------|----------------------------|
| Investigations | | | | |
| 1. | | | | |
| 2. | | | | |
| Lawsuits | | | | |
| 1. | | | | |
| 2. | | | | |
| Complaints | | | | |
| 1 | | | | |
| 2. | | | | |

5. Public Participation Plan

Marin Transit takes an expansive approach to public engagement and seeks to engage with and address the needs of the wide range of stakeholders across the County. Agency goals for public engagement are aimed at amplifying the voices that have been historically underrepresented or left out of the decision-making process. Marin Transit's goals for public engagement are to:

1. Educate and Inform;
2. Encourage Broad Participation;
3. Ensure Engagement Activities are Inclusive and Accessible for All; and
4. Evaluate the Effectiveness and Impact of Engagement Activities

The concerns, issues, ideas, and needs of community members gathered through the public participation process will inform Marin Transit's projects, plans and/or activities and will lead to improved and more inclusive decision making. The full Public Participation Plan can be found in [Appendix A](#).

The *Public Participation Plan* describes the scope of the District's approach to community participation when Marin Transit undertakes planning activities, project development, and local bus service and fare changes. The Plan details numerous communication strategies and tactics to offer early and continuous opportunities for the public to participate and influence decision-making.

The plan relies on robust partnerships with Community Based Organizations, social service agencies, neighborhood groups, advocacy organizations and other local partners that can help amplify our engagement. A list of examples of these groups can be found in [Appendix B](#).

Outreach undertaken since the last Title VI Program Update is included in [Appendix C](#).

6. Language Assistance Plan

Marin Transit is committed to providing meaningful access to public transit services for Limited English Proficient (LEP) customers. Marin Transit uses various methods to accomplish this goal and is planning to enhance those methods to include all necessary languages. Eliminating any potential barriers to participation by persons of limited-English-speaking abilities will have a positive impact not only on LEP individuals themselves, but also on the impact that Marin Transit is able to have in the community. Marin Transit's goal is to make all reasonable efforts to ensure that members of our customer base are not denied access to public transit services due to a limited ability to speak, read, write and/or understand English.

To assist in understanding the needs of those who speak English less than very well, the District undertook an individualized agency assessment that considers the following four factors as recommended by FTA guidance:

1. The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity, or service of the recipient or grantee;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
4. The resources available to the recipient and costs for translation services.

The assessment revealed that Spanish continues to be the predominant language spoken by those who speak English "less than very well" as required by the federal guidance. At a much lower rate, both Chinese (Mandarin and Cantonese) and Vietnamese are languages spoken by greater than 1,000 persons in the county; as such, translating vital documents into these languages is recommended.²

The full Language Assistance Plan can be found in [Appendix D](#).

² Based on a census-based analysis of languages spoken by Limited English Proficient (LEP) populations, Marin Transit found that Chinese (including Mandarin and Cantonese speakers) should be included for translation services, as Chinese is spoken by greater than 1,000 LEP individuals in the county and rises to the level of a "safe harbor" language under federal guidelines. Due to the greater prevalence of Mandarin speakers in Marin County, documents will be translated into Simplified Chinese which is the written form of Mandarin.

7. Membership of Decision-Making Bodies

As of June 2023, Marin Transit does not have non-elected committees or councils with membership chosen by Marin Transit.

8. Subrecipient Monitoring

As of June 2023, Marin Transit does not have any subrecipients for Federal Transit Administration funding.

9. Facility Equity Analysis

During the last three years, Marin Transit has undertaken several Facility Equity Analyses for proposed transit facilities that Marin Transit has purchased (3000 Kerner Blvd, 3010 Kerner Blvd, and 3020 Kerner Blvd.). The full Board reports for the proposed purchases can be found in [Appendix E](#).

10. Service Standards and Service Policies

Introduction

All fixed route transit providers are required to set quantitative service standards and policies for each specific fixed-route mode of service they provide. These standards and policies must address how service is distributed across the transit system and must ensure fair distribution across different populations; transit service and amenities must be allocated without regard to race, color or national origin.

Marin Transit adapted and refined the system-wide service standards from its Short Range Transit Plan (SRTP) to reflect FTA guidance and Marin Transit’s system-wide policies. These service standards will be used in the required Service Performance Monitoring contained in Chapter 13.

The existing standards address:

- *Vehicle load for each mode*: Generally expressed as the ratio of passengers to the number of seats on a vehicle.
- *Vehicle headways for each mode*: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- *On-time performance for each mode*: A measure of runs that reach their timepoint stops at the scheduled times.
- *Service availability for each mode*: A general measure of the distribution of routes within an agency’s service area.

The existing policies address:

- *Siting of Transit Amenities*, i.e. shelters and benches, within the jurisdiction of the operator; and
- *Vehicle Assignment* for the type of service offered.

Vehicle Load Standard

A vehicle load factor is the ratio of the number of seats on a vehicle to the number of passengers on-board. Load factor is an indicator of the extent of or potential for overcrowding. It may indicate a need for additional service or larger vehicles to provide quality service. Marin Transit works closely with its contractors to ensure passengers are not left behind due to overcrowding or overloads. Overcrowding is particularly monitored on routes to and from the Canal area of San Rafael (one of the highest ridership areas in the service area), routes that provide service along Highway 101, routes that provide supplemental school service, and West Marin Stagecoach routes that provide weekend Summer service. Shadow, or back-up, buses have been deployed on Marin Transit services to accommodate peaks in demand based on weather and traffic conditions and during social distancing due to the COVID-19 pandemic.

Standard: Marin Transit’s system-wide goal is to have an average maximum load factor for local service not to exceed 1.25, as measured by a ratio of total passengers to seats on board the vehicles. This equates to a maximum of approximately 10 standees on a 40’ vehicle.

Vehicle Headway Standard

Vehicle headways are the frequency at which individual routes travel in one direction. In the most densely populated areas or peak travel times, it is more desirable to provide more frequent service (shorter headways) to accommodate higher demand. In less densely populated or rural areas, or at non-peak times of day, it is common to have less frequent service as demand warrants. Additionally, some service types may not have a standard, as they respond to events or seasonal travel time periods. Marin Transit provides frequent bus service in the high-ridership Canal area of San Rafael to minimize overcrowding and ensure passengers wait no longer than a combined 15 minutes for the next bus (including a variety of routes) during peak periods, and often wait times are shorter.

Standard: Marin Transit’s system-wide goal is to provide service at least every 60 minutes during the peak and off-peak times with additional frequency warranted by demand. As many routes provide overlapping service within a given corridor, corridor frequencies are typically much higher than route level frequencies. Services in rural areas will be deployed as demand warrants.

On-Time Performance

Service that runs on time provides riders with a sense that the bus will be there as scheduled. Marin Transit defines “on time” as up to 5 minutes late and 1 minute early.

Standard: To ensure reliable services, Marin Transit aims to have an 80% on-time performance target at timepoint stops for fixed route operations. In addition, the agency standard is less than 1% of fixed-route trips missed or removed from the daily schedule. (Altered slightly from SRTP for purposes of this report.)

Service Availability

Service availability reflects the route design and service frequency and can be influenced by population density, service frequency, and stop spacing.

Standard: Marin Transit’s goal is to provide transit within ½ mile of 85% of all County residents, 80% of all jobs within the County, and 90% of residential units in large multifamily housing developments, as well as ensuring that 90% and 75% of middle and high schools are within ½ mile and ¼ mile, respectively, of transit service.

Transit Amenities

Transit amenities policies ensure that improvements to the riders’ waiting experience at stops and stations are distributed according to rider need. Transit amenities include items such as benches, shelters, signage or real-time passenger information signs.

Policy: When resources allow for improvements at multiple stop locations, Marin Transit will prioritize resources based on passenger activity – e.g. boarding and alighting activity – and transfer opportunities.

Vehicle Assignment

Assigning vehicles by policy helps ensure that vehicles are placed into service based on service type, ridership demand or roadway requirements rather than by other conditions, such as neighborhood demographics, that could result in discriminatory outcomes. All vehicles used in local service are Americans with Disabilities Act (ADA) accessible, accommodating at least two wheelchairs and two bicycles.

Policy: Vehicle size and capacity will be assigned based on demand and passenger load factors. Those routes with the lowest passenger demand will be assigned a 24-foot cutaway, those with medium and high demand will be assigned a 30-foot, 35-foot, or 40-foot vehicle. Due to challenging terrain and roadways in rural West Marin, vehicle assignments and features may be adjusted to allow for safe operations.

11. Demographic and Service Profile Maps

Introduction

Demographic and service profile maps representing Marin Transit’s service area are presented below. Marin Transit’s service area boundary is coterminous with Marin County.

Methodology

To create minority and low-income maps, staff calculated the share of the total service area population that is low-income and minority. Minority population is defined as anyone self-identifying as something other than Non-Hispanic White only. Low-income population is defined as any household with an annual income that is below 200% of the federal poverty guidelines. The Marin Transit service area (Marin County) is 30.3% minority and 15.8% low income – these are the “countywide baseline averages.” Any block group with a share of minority or low-income population greater than the countywide baseline average is considered a “minority block group” or “low-income block group” respectively. The 2017-2021 American Community data was used for minority and income designations.

Maps

The maps below show key attractors and generators of bus trips in the Marin Transit service area and county, including schools, libraries and medical facilities as well as Marin Transit routes and major transit facilities.

Figure 5 highlights the census block groups that have a higher percentage of minority residents than the countywide baseline average.

Figure 6 highlights the census block groups that have a higher percentage of low-income residents than the countywide baseline average.

Figure 5 Minority Map

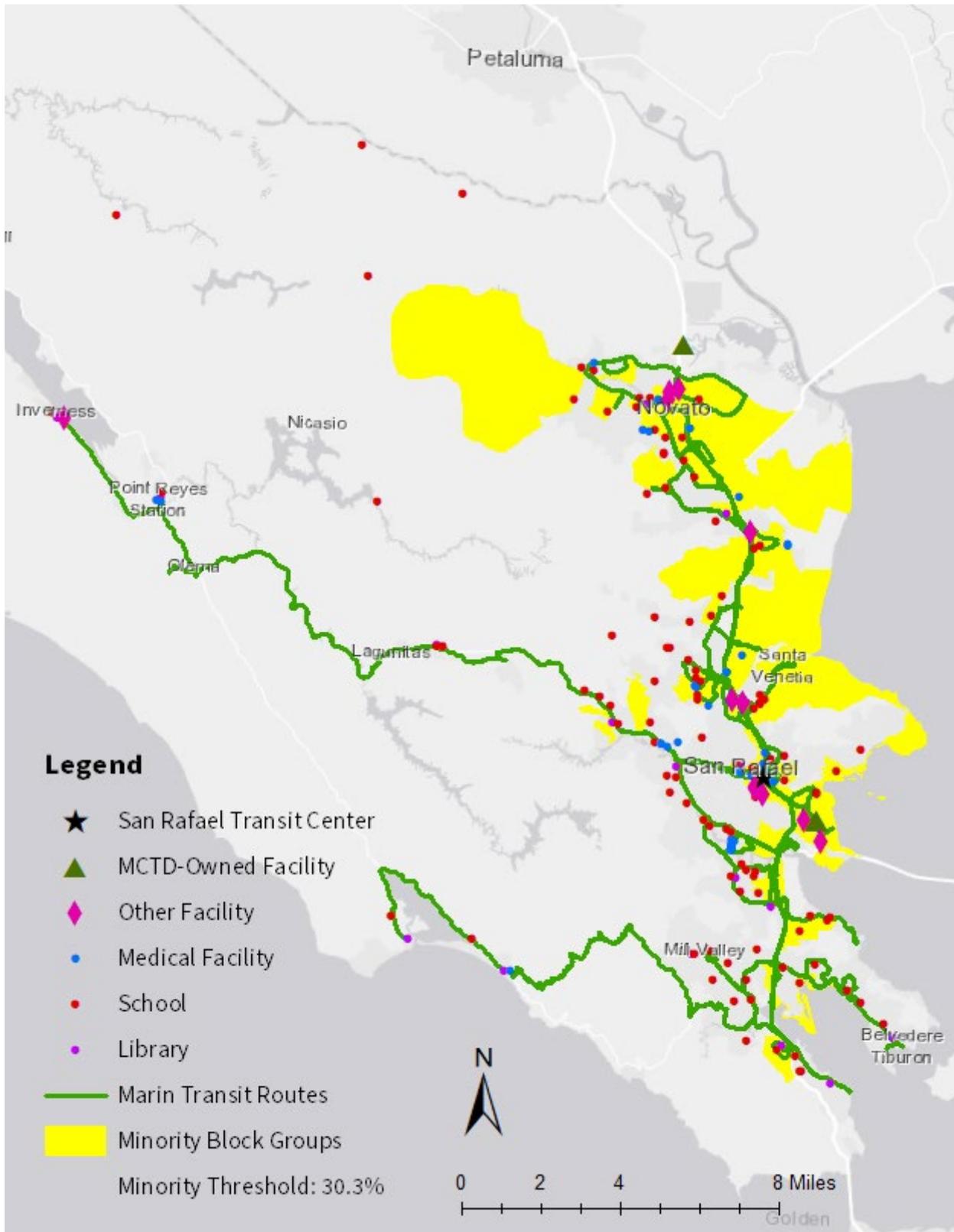
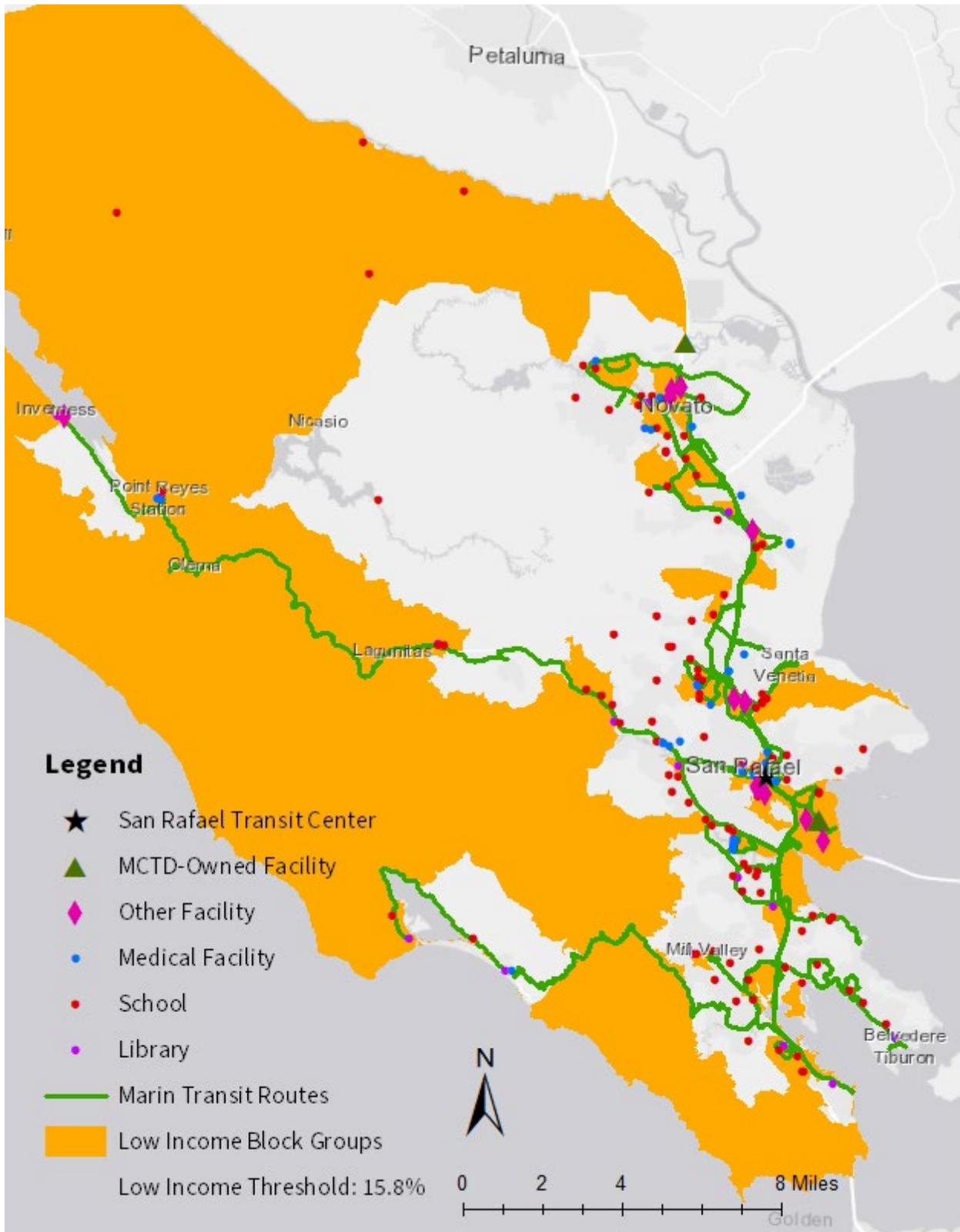


Figure 6 Low Income Block Groups Map



12. Demographic Ridership and Travel Patterns

Introduction

In Spring 2017, Marin Transit conducted a passenger survey in partnership with the Metropolitan Transportation Commission (MTC) in both English and Spanish to better understand characteristics of riders, including transfer activity, rider origins, demographics, and stop-level information. A rider survey was planned to occur in 2020; however, due to the COVID pandemic, the survey was delayed to address social distancing procedures and ridership changes with the region’s transit operators. The next on-board ridership survey to be conducted by MTC is scheduled to occur in the spring of 2026.

Absent updated onboard survey data, Marin Transit reviewed census and ridership data to determine if any underlying demographic changes may have occurred in the years since the last survey. The data presented below suggests that no significant demographic changes have taken place in the county. As a result, the 2017 on-board survey data represents the most accurate and timely data available.

Demographic and Ridership Comparison 2017-2020

Census Data

American Community Survey (ACS) data from table S0102 was analyzed to assess if there are differences in select population characteristics between the 2017 and 2021 ACS 5-year samples. This included characteristics that may influence transit ridership (such as employment status, disability, and poverty status) as well as general population characteristics such as ethnicity, Limited English Proficiency, and educational attainment. There was very little difference between the 2017 and 2021 5-year samples in Marin County, most estimates changing less than 2%. This provides justification for using prior on-board survey results in this analysis. Table 2 presents the census comparison.

Table 2 2017 - 2021 Population Comparisons

| Characteristic | 2017 Estimate | 2021 Estimate | Difference |
|---|---------------|---------------|------------|
| Total Population | | | |
| Population | 260,814 | 262,387 | 1,573 |
| Sex And Age | | | |
| Male | 48.90% | 49.20% | 0.3% |
| Female | 51.10% | 50.80% | -0.3% |
| Median age (years) | 46.1 | 47.1 | 1.00 |
| Race and Hispanic or Latino Origin | | | |
| One race | 95.30% | 92.20% | -3.1% |
| White | 78.20% | 75.30% | -2.9% |
| Black or African American | 2.20% | 2.30% | 0.1% |
| American Indian and Alaska Native | 0.30% | 0.40% | 0.1% |

| | | | |
|---|-----------|-----------|----------|
| Asian | 5.70% | 6.10% | 0.4% |
| Native Hawaiian and Other Pacific Islander | 0.20% | 0.20% | 0.0% |
| Some other race | 8.70% | 8.00% | -0.7% |
| Two or more races | 4.70% | 7.80% | 3.1% |
| Hispanic or Latino origin (of any race) | 15.90% | 16.40% | 0.5% |
| White alone, not Hispanic or Latino | 71.50% | 69.70% | -1.8% |
| Educational Attainment | | | |
| Population 25 years and over | 191,055 | 192,700 | 1,645 |
| Less than high school graduate | 6.80% | 6.60% | -0.2% |
| High school graduate, GED, or alternative | 11.20% | 10.20% | -1.0% |
| Some college or associate's degree | 24.50% | 23.10% | -1.4% |
| Bachelor's degree or higher | 57.50% | 60.10% | 2.6% |
| Disability Status | | | |
| Civilian noninstitutionalized population | 256,100 | 258,462 | 2,362 |
| With any disability | 9.20% | 9.20% | 0.0% |
| No disability | 90.80% | 90.80% | 0.0% |
| Language Spoken at Home And Ability to Speak English | | | |
| Population 5 years and over | 248,260 | 250,639 | 2,379.00 |
| English only | 77.30% | 78.60% | 1.3% |
| Language other than English | 22.70% | 21.40% | -1.3% |
| Speak English less than "very well" | 8.90% | 8.30% | -0.6% |
| Employment Status | | | |
| Population 16 years and over | 213,034 | 216,621 | 3,587 |
| In labor force | 64.30% | 63.60% | -0.7% |
| Civilian labor force | 64.20% | 63.60% | -0.6% |
| Employed | 61.30% | 60.30% | -1.0% |
| Unemployed | 2.90% | 3.30% | 0.4% |
| Percent of civilian labor force | 4.50% | 5.20% | 0.7% |
| Armed forces | 0.10% | 0.10% | 0.0% |
| Not in labor force | 35.70% | 36.40% | 0.7% |
| Income in The Past 12 Months (In Inflation-Adjusted Dollars) | | | |
| Households | 104,846 | 103,751 | -1,095 |
| With earnings | 79.00% | 77.90% | -1.10% |
| Mean earnings (dollars) | \$153,568 | \$188,574 | \$35,006 |
| Poverty Status in the Past 12 Months | | | |
| Population for whom poverty status is determined | 254,628 | 257,160 | 2,532 |
| Below 100 percent of the poverty level | 8.10% | 6.90% | -1.2% |
| 100 to 149 percent of the poverty level | 5.10% | 4.00% | -1.1% |
| At or above 150 percent of the poverty level | 86.90% | 89.10% | 2.2% |

Source: American Community Survey (ACS) Table S0102

Ridership Comparison

We also reviewed recent Marin Transit ridership data to determine whether changes in route-level ridership patterns would suggest that demographic or travel trends would render significant changes to the demographic assumptions. As shown in Table 3, below, while there was an 18% reduction in ridership associated with the COVID-19 pandemic, there was very little change in route-level ridership as a percentage of total ridership. This signals that even though ridership is still recovering, similar travel patterns exist between 2017 and 2022. This provides even greater confidence that using the 2017 on-board survey for demographic analysis is appropriate until new data is available.

Table 3 Route Level Ridership Comparison (2017-2022)

| Route | Ridership FY 2017 | Ridership FY 2022 | % Change (2017-2022) | Route % of Total Ridership FY 2017 | Route % of Total Ridership FY 2022 | Difference |
|-------|-------------------|-------------------|----------------------|------------------------------------|------------------------------------|------------|
| 17 | 247,998 | 181,285 | -27% | 10% | 9% | -1% |
| 22 | 215,758 | 118,390 | -45% | 8% | 6% | -3% |
| 23 | 199,150 | 163,184 | -18% | 8% | 8% | 0% |
| 23X | 49,255 | 56,299 | 14% | 2% | 3% | 1% |
| 29 | 40,103 | 36,792 | -8% | 2% | 2% | 0% |
| 35 | 658,869 | 511,590 | -22% | 25% | 24% | -1% |
| 36 | 342,178 | 235,339 | -31% | 13% | 11% | -2% |
| 49 | 237,236 | 196,555 | -17% | 9% | 9% | 0% |
| 61 | 36,328 | 36,118 | -1% | 1% | 2% | 0% |
| 68 | 76,598 | 64,318 | -16% | 3% | 3% | 0% |
| 71 | 121,141 | 237,842 | 96% | 5% | 11% | 7% |
| 219 | 50,449 | 35,760 | -29% | 2% | 2% | 0% |
| 228 | 71,340 | 52,605 | -26% | 3% | 2% | 0% |
| 233 | 42,798 | 27,666 | -35% | 2% | 1% | 0% |
| 245 | 49,766 | 39,924 | -20% | 2% | 2% | 0% |
| 251 | 95,506 | 77,729 | -19% | 4% | 4% | 0% |
| 257 | 69,126 | 51,241 | -26% | 3% | 2% | 0% |
| Total | 2,603,599 | 2,122,637 | -18% | | | |

Finding

The 2017 on-board survey represents the most comprehensive data available, and this data appears to still be valid based on the comparisons shown above. While it's ideal to have current demographic and ridership data, using this data for comparison and analysis is warranted until new on-board survey data can be collected. A summary of the 2017 On-Board Survey is provided below.

2017 On-Board Survey

The following provides a summary of the 2017 on-board survey results. The full survey, including sampling plan and methodology, is presented in [Appendix F](#).

Travel/Usage Patterns

- **Transfers:** About 40% of riders say they will use two or more transit vehicles (buses, trains, ferries) on their one-way trip. This is most commonly another Marin Transit bus or a Golden Gate Transit bus.
- **Access Mode:** Most riders walk to reach their first bus/transit vehicle (94%), and most riders also walk from their last bus/other transit vehicle to their final destination (93%).
- **Fare Payment:** More than half of Marin Transit riders paid for their trip with cash (60%), while only 15% said they used a Clipper card.
- **Usage Frequency:** Nearly two-thirds of riders (64%) use Marin Transit five or more days per week. Most riders (93%) use Marin Transit at least once per week.

Marin Transit Riders

The following is a summary of key characteristics of Marin Transit riders.

- **Internet Access:** While 80% of riders say they access the Internet on a smartphone or tablet, 13% say they do not access the Internet at all.
- **Youth riders:** Youth, including high school and college students, are a key audience for Marin Transit.
 - Notably, 15% of Marin Transit riders pay a youth fare.
 - In addition, 14% pay with either a K-12 pass (7%) or a Marin College pass (7%)
- **Spanish-speaking riders:** Hispanic riders/Spanish or bilingual speakers are another key audience for Marin Transit.
 - 23% of respondents completed the survey in Spanish; Route 36 had the highest share of respondents completing the survey in Spanish, while Route 61 had the lowest share of respondents completing a Spanish language survey.
 - In addition, more than half of respondents (52%) said they are of Hispanic, Latino, or Spanish ethnicity.
- **Vehicle Ownership:** The average Marin Transit rider household has only 1 vehicle.
- **Household Size:** Three to four people live in the average rider household and 2 of them are working.

13. Service Performance Monitoring

The FTA requires providers of public transportation that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population to monitor the performance of their transit system relative to their system-wide service standards and service policies (described in Chapter 10) no less than every three years.

Marin Transit has a robust performance monitoring program that includes a variety of performance metrics. Every quarter, the Marin Transit Board reviews the performance of services against established standards. However, these standards are separate from the Title VI standards and policies outlined in this report.

There are two components of the Title VI monitoring program: service standards and service policies. The service standards are used to compare the performance of Marin Transit routes that are primarily operated in minority areas ("minority routes") with lines that are primarily operated in non-minority areas ("non-minority routes"). The Marin Transit service policies are designed to monitor the results of vehicle assignment practices and the distribution of transit amenities to ensure that such practices are not conducted in a discriminatory manner.

It should be noted that Marin Transit is scheduled to implement service changes in June 2023 that affect about half of the current routes. This may change minority route designations and/or result in changes in the performance monitoring results. It should be further noted that Marin Transit is contemplating fare changes over the next several years that could change service performance monitoring results, as well.

The entire Service Performance Monitoring program, including results, is included in [Appendix G](#).

14. Major Service Change, Disparate Impact and Disproportionate Burden Policies

In 2013, Marin Transit adopted its Title VI policies which include the following:

- **Major Service Change Policy:** Defines what constitutes a “major service change” for Marin Transit; only “major service changes” are subject to a service equity analysis.
- **Disparate Impact Policy:** Establishes a threshold to determine when adverse effects of proposed service or fare changes are borne disproportionately by minority populations.
- **Disproportionate Burden Policy:** Establishes a threshold to determine when adverse effects of proposed service or fare changes are borne disproportionately by low-income populations.

To allow for public review of the policies and associated thresholds when the policies were initially established, Marin Transit conducted extensive public engagement. A public hearing was held on May 20, 2013, which initiated a 45-day public comment period. Four public meetings were held in advance of the May 20, 2013 public hearing; Novato on May 2, San Rafael on May 4 and 8, and Marin City on May 7. The May 4 meeting was organized in cooperation with Asian Advocacy; it included over 20 Vietnamese residents and was conducted through a translator. The May 8 meeting was organized by Grassroots Leadership Network and was conducted simultaneously in Spanish; it included approximately 25 participants. Staff sent out media announcements and distributed posters in Spanish and English to advertise the meetings, and the three proposed Title VI policies were made available and presented at the public meetings. Throughout this engagement, staff received constructive feedback and thoughtful input to assist in developing ongoing Title VI-related outreach.

Marin Transit’s Board of Directors held a second public hearing at the June 24, 2013 meeting to consider revised policies that had been updated to reflect public input. In preparation for the June hearing, staff issued public hearing notices in English and Spanish, incorporated input received at the May 20 public hearing, and consulted with representatives of community and advocacy organizations in Marin. At the June meeting, these policies were presented in draft final form with the intent to consider any additional public input regarding these policies in the development of the District’s full Title VI Program throughout the remainder of 2013. The Board officially adopted the policies with approval of the full Title VI Program on April 21, 2014.

In spring of 2023, staff made administrative revisions to the Major Service Change, Disparate Impact and Disproportionate Burden policies. These changes were made to: 1) streamline and clarify language to ensure clear understanding of the intent of the policies and consistent application across staff and over time, 2) update formatting and 3) extract them from the Title VI Program to be stand-alone official Board policies that are easier to view and access. At the April 3, 2023 Marin Transit Board of Directors meeting, Board members considered and adopted these administrative updates.

The revisions do not make any substantive changes to the meaning of the policies. No changes were made to the thresholds that establish when a major service change or fare change would result in a Disparate Impact to minority populations or a Disproportionate Burden to low-income populations.

The current adopted policies are included in [Appendix H](#).

15. Results of Service and/or Fare Equity Analyses

There have been three Service and Fare Equity Analyses completed since the last Title VI Program Update that are included in Appendix I:

1. Marin Transit Fixed Route Pass Programs (Feb. 2020)
2. Marin Transit Fixed Route Fares for Eligible Low-Income Riders on the Regional Electronic Fare Payment System (October 2020)
3. Systemwide Service Changes (March 2023)

16. Board Adoption of the Title VI Program

Appendix K presents the resolution that reflects the Board adoption of the 2023 Title VI Program Update in June 2023.