

Golden Gate Bridge, Highway and Transportation District
September 30, 2006

2006 TITLE VI CIVIL RIGHTS SUBMISSION

OVERVIEW

This Title VI Civil Rights submission update is presented to the Federal Transit Administration (FTA) on behalf of Golden Gate Transit (“GGT”), an operating division of Golden Gate Bridge, Highway and Transportation District (“GGBHTD” or “District”). It is organized in accordance with the July 30, 1998 Memorandum from Arthur A. Lopez, Director, Office of Civil Rights, entitled “ACTION: Title VI Program Update Requirements” and its attachment Paperwork Reduction for Recipients of Federal Transit Administration Funds Title VI Updates, with reference to UMTA Circular 4702.1.

Golden Gate Transit provides ferry service between Marin and San Francisco counties, and bus service between Sonoma, Marin, and San Francisco counties. Passengers are generally residents of Marin County traveling within that county or residents of Marin and Sonoma counties traveling to San Francisco for work trips. San Francisco residents also use these transit services, but the predominant use is by North Bay residents. Golden Gate Transit also operates a bus route to Contra Costa County via the Richmond Bridge as a regional service on behalf of the Metropolitan Transportation Commission. Three exhibits provide an understanding of the Golden Gate Transit service area: **Exhibit 1**, Snapshot of Minority Population in Marin County; **Exhibit 2**, Marin County 2000 Census Tracts with GGT Bus Routes; and **Exhibit 3**, 2000 Sonoma Census Tracts with GGT Bus Routes. Also, please see attachments to the Appendix that provide the racial and ethnic composition of census tracts in the Golden Gate Transit service area: **A-1** Marin Census Tracts in the GGT Service Area and **A-2** Sonoma Census Tracts in the GGT Service. Minority census tracts are defined as those where the percentage of minority population equals or exceeds the average percentage minority population for the entire county. San Francisco, Sonoma and Contra Costa Counties all have local bus operators in addition to GGT regional bus services. Thus, the focus of this Title VI report is Marin County, where GGT operates both regional and local bus services.

During the three-year time covered by this report (FY 03-04 through FY 05-06), the single biggest change in Golden Gate Transit bus service in 30 years took place. This was the service reduction implemented in November 2003. This update includes a special Title VI analysis of that service reduction. This analysis, a.k.a. *Title VI Scenario E Analysis*, was conducted in the spring of 2003 to provide District policymakers with guidance in crafting the service reduction plan. The Scenario E Analysis contains a comparison of transit service characteristics for minority vs. non-minority tracts.

Another very significant change in GGT bus service policy occurred in November 2004 with differentiation between **local** Marin County Transit District (MCTD) bus service and regional GGBHTD bus service. Since its inception in 1972, GGT has provided local bus service within Marin County under an agreement with MCTD. Until recently, the differentiation between local MCTD service and regional GGBHTD service has been institutional and virtually invisible to the public. Passengers making local trips on MCTD local routes or GGBHTD regional routes perceive all the service as GGT service. GGT planned, managed, and operated local service on MCTD’s behalf. MCTD is now asserting its own identity and assuming more control over Marin local service. As part of the November 2003 service reduction and reorganization, several long regional routes were reorganized into shorter local and regional routes. Effective with the November 2004

agreement between GGBHTD and MCTD, the local routes are MCTD routes and are supported and controlled by MCTD, even though operated by GGT. MCTD has taken more initiative in setting fares and scheduling local service. Other related developments include:

- MCTD is increasing its staff size.
- MCTD published its own Short Range Transit Plan (draft SRTP) in January 2006 to describe current conditions and future plans for Marin local bus service.
- More routes have transitioned from GGT status to MCTD status. Including the 2003 restructuring, MCTD service hours have more than doubled to the present.
- MCTD and GGBHTD recently established a new agreement for GGT to operate MCTD service for the period May 2006 through June 2012.

MCTD is not a federal aid recipient and this Title VI update will include information on the MCTD service operated by GGT. As MCTD's fixed bus route service provider, GGT schedules, operates, and supervises the Marin Local service.

I. GENERAL REPORTING REQUIREMENTS

a. List of Active Lawsuits, Complaints

As of September, 2006, there are no active civil rights complaints pending against the District alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

b. Description of Pending Applications for Financial Assistance

As of September 2006, the District has one pending application for federal financial assistance.

The District's FY 2006 Urbanized Area Formula Program Grant for \$1,813,045 Federal Transit Administration funds to support various capital improvement projects is currently being prepared. Projects included in this grant will be Management Information Systems, Santa Rosa Fuel Tanks Replacement, Computerized Dispatch System Upgrade, and possibly the Bus Radio Communications System project. Additional funds in the amount of up to \$24,295,571 may be amended into the grant at a later date to purchase replacement revenue vehicles (buses).

A U.S. Department of Homeland Security grant of \$428,740 was awarded by the Office of Grants and Training under the 2005 Transit Security Grant Program to implement ferry terminal and vessel safety and security improvements.

c. Three-Year Summary of All Civil Rights Compliance Review Activities

There have been no civil rights compliance review activities relative to the District's transit services during the last three years.

d. and

e. Most Recent Date of Grantee-Signed Annual Certifications and Assurances

Current operative certifications and assurances are the Federal Fiscal Year 2006 FTA Certifications and Assurances, authorized by the District Board of Directors and executed by the General Manager and Attorney on January 6, 2006.

II. PROGRAM-SPECIFIC REQUIREMENTS FOR GRANTEES IN

URBANIZED AREAS WITH POPULATIONS \geq 200,000

a. District's Title VI Internal Review Process

A copy is attached as Exhibit 4.

b. Implementation of Title VI Review Process For At Least One Service Delivery Or Capital Program Decision In Last 3 Years

A special Title VI Analysis was produced in June 2003 for a proposed reduction and restructuring of GGT bus services that became effective November 2, 2003, referred to as Modified Scenario E. This analysis followed the broad outline provided in the District's Title VI Internal Review Process referenced above. This analysis is attached as the Appendix at the end of this report.

c. Implementation of Internal Monitoring Processes Relative to Levels and Quality of Service

Following is a list of past service changes implemented between July 2003 and June 2006, with the exception of those of November 2003, discussed in the Appendix. (ML) indicates a Marin Local (MCTD) route.

March 2004

- Sell Marin Local ticket books at two locations in East San Rafael and at one in Marin City (both of these locations are in minority areas)
- Route 22 (ML): Extended all existing trips from San Anselmo Hub terminus to San Rafael Transit Center (SRTC) terminus (about 30 trips/day, 7 days/week)
- Route 22 (ML): Added five southbound morning trips from SRTC to Kentfield (College of Marin)
- Route 57 (ML): Most weekend trips now serve Marinwood (13 of 15 SB, 14 of 18 NB)
- Route 60: All trips (3 SB, 3 NB) serve Sausalito. Route 60 operates between SRTC and SF Financial District.

June 2004

- Route 15 (ML): All trips between Tiburon and Marin City now travel via Mill Valley
- Route 10 all trips: Service discontinued between Marin City and Strawberry via Mill Valley. Service now between Marin City and San Francisco.

July 2004

- Larkspur Ferry: Significant schedule changes, including provision of almost all trips by high-speed vessels.

September 2004

- Rt 58, all trips: Service rerouted in Novato to skip Ignacio and instead serve the east side of Novato, including the new Hamilton neighborhood.

December 2004, March, June, September 2005

- No service changes.

December 2005

- Routes 32 and 34 eliminated due to low ridership. These routes were commute shuttles between SRTC and the San Rafael neighborhoods of Peacock Gap (32) and Santa Venetia (34). They formerly traveled all the way to SF Financial District.

March 2006

- Route 70/80: Two late-night NB trips that had served Mill Valley no longer do so.

None of these changes is major when considered individually. Most are rearrangements within served areas rather than an extension to new areas or leaving an area unserved. An exception is the elimination of Route 32, which removed all transit service from Peacock Gap. The ridership became too low to justify continuing to provide service to this non-minority area.

All major service changes implemented during the last three years were made subject to the District's Title VI internal review process. A major service change is defined as impacting 25% or more of a route's service. No disparities were found with regard to provision of service to minority communities or passengers.

Attached as **Exhibit 5** below is an updated **Title VI Analysis Table**. It compares three minority zones with three similar non-minority zones with respect to service characteristics such as number of routes, service frequency, passenger fares, etc. The three minority zones in the comparison have the highest proportion of minority persons in the service area. The comparison shows that these minority zones receive service that is at least as frequent, as direct, and as swift as service provided to non-minority areas. This analysis demonstrates that Golden Gate Transit does not discriminate in the service it provides to the public.

Regarding vehicle amenities, the GGT bus fleet is uniformly equipped with comfortable front-facing seats, air conditioning, reading lights, etc. The principal distinction between buses is size. In addition to the main fleet of 40' coaches, GGT also operates a smaller number of 45' coaches and a very small number of 60' articulated coaches as well as 30' coaches. These atypical coaches are assigned to service as follows:

- 45' coaches to long routes where individual passengers make long trips, such as commute service from Sonoma County or Novato to San Francisco, and to individual commute trips recording passenger overloads.
- 30' coaches to trips on narrow winding roads, such as to Paradise Cay in Tiburon or to Stinson Beach (recently discontinued).
- Articulated coaches to busiest routes, such as peak period service from Canal District to SRTC and to southern Marin.

d. Changes in District Service Standards and Policies during the last Three Years.

GGT maintains many bus and ferry performance standards, including service quality standards for the transit-riding public. There have been no changes in these standards during the last three years. These standards are applied throughout the GGT bus and ferry service area and equally affect all communities and people served by GGT. Minorities are not disproportionately affected.

It should also be noted that District policy is to provide a consistent level of transit amenities to all passengers. Vehicle amenities are discussed in the preceding section. Passenger shelters are provided as needed and as resources permit. Some locations have arrangements with advertising companies that provide shelters without cost to the District or the local jurisdiction. Following is a list of performance measures and associated standards.

(1) **BUS**

- Percent of Trips Operated On Time: 90%
- Passenger Complaints per 100,000 Boardings – Service Delivery: No standard
- Percent of Scheduled Trips Cancelled – All Reasons: $\leq 1\%$ of Scheduled
- Miles Between Accidents: No standard
- Miles Between Mechanical Failures: 20,000

(2) **FERRY**

- Percent of Trips Operated On-Time: 95%
- Passenger Complaints per 100,000 Boardings – Service Delivery: No standard
- Percent of Scheduled Trips Cancelled – All Reasons: $\leq 1\%$ of Scheduled
- Accidents a Year: No standard
- Miles between Mechanical Failures: 10,000

(3) **PRODUCTIVITY MEASURES**

- Passengers/Service Hour
- Revenue/Service Hour
- Budget/Actual Op Costs
- Op Costs/Hour
- Fare/Op Expense – Farebox Recovery Ratio
- Deficit/Passenger

e. Transit Construction and/or Major Mobility Projects

GGT capital projects are reviewed in accordance with California Environmental Quality Act (CEQA) regulations. The District utilizes an “effects on minority communities” category in the environmental checklist form (**Exhibit 6**), which is used to identify any environmental impacts. Staff also includes consideration of Federal Executive Order 12898, Environmental Justice, in its assessment.

The current GGT Capital Program contains 17 bus projects and 22 ferry projects active from the present through August 2009. These projects have been reviewed to assess impacts on minority communities and it has been determined that no such impacts will result from their construction.

Of the Bus projects, four involve replacement, refurbishment or improvement of buses; eight are facilities improvements; two involve replacement or improvement of paratransit vans; and three are for general transit support, including replacement of non-revenue vehicles.

Of the Ferry projects, three involve replacement, refurbishment or improvement of ferry

vessels; 16 are facilities improvements, including channel, berth and basin dredging; and three are for general transit support, including commuter parking improvements, security systems and marsh restoration. All projects except the dredging projects take place on existing District property. All projects, including those involving locations away from District property, were reviewed in accordance with CEQA regulations, including the “effects on minority communities” category.

f. Description of service changes proposed for the next three years and anticipated effect of these changes on minority communities and transit users.

No significant changes in the upcoming three years are proposed for either Golden Gate Ferry service or Golden Gate Transit regional bus service. However, significant changes are planned for Marin local bus service administered by MCTD. Some of these changes may take longer than three years to implement – for example, establishing a new Ignacio transfer hub and utilizing smaller buses. Following is a summary of the proposed local bus service changes and a description of potential impacts on minority areas.

Novato

- Establish new Transfer Hub in Ignacio near Highway 101
- Provide some service with smaller buses
- Increase service to Hamilton.

These changes are expected to improve transit service within Novato and between Novato and the rest of Marin County. Since all the densely populated areas west of Highway 101 in Novato from central Novato south to Ignacio are minority zones (census tracts), these changes should improve service for minority passengers. The new Ignacio transfer site will be located at the border of two minority zones. A new route with timed connections in Novato would provide direct service to Kaiser Hospital in Terra Linda. Small buses would have less impact in residential neighborhoods, including several Novato minority zones.

San Rafael

- Expand duration of 15-minute headways
- Provide direct service from Canal to Larkspur Landing/Marin General Hospital/ College of Marin
- Provide direct service from SRTC to Mill Valley, with easy connection to Canal
- Provide one-seat service from Canal to Civic Center, Northgate Mall, Kaiser Hospital.

San Rafael’s Canal District is Marin’s largest minority zone in both the absolute and relative sense. All of these proposed changes would provide this neighborhood with improved bus service. Currently, there is 30-minute service to SRTC during midday and 15-minute service during the peak periods. This proposal would expand the peak-period service, thereby increasing the amount of 15-minute headway service. More direct service would be provided to other key destinations in Marin.

Ross Valley

- Provide direct service from Fairfax to SRTC
- Run more buses on the Sir Francis Drake Boulevard corridor.

The primary improvement would eliminate the need to transfer when traveling from central San Rafael to Fairfax and western San Anselmo.

Southern Marin

- Establish direct Mill Valley-San Rafael service

- Increase service frequency from southern Marin to Ross Valley to San Rafael. Route 22 service from the Sausalito Ferry to Corte Madera, Larkspur, San Anselmo, and San Rafael would increase to ½-hour headways during peak periods and remain hourly during midday and evenings. This route is an important connection for residents of all the towns through which it passes, including Canal residents, who use it to commute to work in southern Marin and Ross Valley. More direct routing between Mill Valley and San Rafael would benefit the many San Rafael minority residents who ride transit.

Attachments

- Exhibit 1 Snapshot of Minority Population in Marin County
- Exhibit 2 Marin County 2000 Census Tracts with GGT Bus Routes
- Exhibit 3 2000 Sonoma County Census Tracts with GGT Bus Routes
- Exhibit 4 District's Title VI Internal Review Process
- Exhibit 5 Comparison of Transit Service Characteristics, 3 Pairs of Minority v. Non-Minority Tracts (5/06)
- Exhibit 6 Environmental Checklist Form

Please also see exhibits attached to the **Appendix: Title VI, Analysis of GGT Bus Service Reduction – Modified Scenario E.**

2003 Title VI Analysis of GGT Bus Service Reduction Modified Scenario E

I. BACKGROUND

Title VI, Section 601, of the Civil Rights Act of 1964 provides that “[n]o person ... shall, on the grounds of race, color, or national origin, be excluded from participation, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” This statute prohibits the District, as a recipient of federal funds, from discriminating intentionally in the provision of transit services. The United States Department of Transportation (“DOT”) has adopted regulations under Title VI to prohibit grantees from engaging in activities that have a disparate impact on the basis of race or other protected categories. Under these regulations, as a condition of federal assistance, the District may not undertake projects that disproportionately burden protected populations.

Title VI applies to discrimination on the basis of “race, color, or national origin” and not to discrimination against low-income individuals. However, in an Executive Order in 1994, President Clinton directed federal agencies to administer and implement their programs to avoid “disproportionately high and adverse” effects on low-income populations as well. Whether DOT regulations or the Executive Order can go beyond the Title VI statute and prohibit discrimination against low-income persons has not been established. However, the District is committed to the principles of environmental justice and considers impacts on low-income communities in its Title VI analysis. As reflected in judicial decisions, transit projects that will have a disparate impact on racial or ethnic minorities must be (a) necessary to a legitimate and integral goal of the entity’s institutional mission, and (b) represent the least discriminatory means of accomplishing the objective. In addition, the DOT order on environmental justice indicates that mitigation measures and offsetting benefits to impacted communities will weigh in favor of Title VI compliance. Transit agencies should also work to ensure equitable investment in transit services serving white, higher-income populations and minority, lower-income populations.

In keeping with its commitment to the principles of Title VI, the District evaluates its policies and programs to avoid discriminatory effects on minority and low-income populations. To that end, the District has incorporated Title VI considerations in its development of the proposed transit service modifications. That process and the refinements to the program that the District staff recommends to mitigate identified impacts on low-income and minority transit users are summarized below.

Complying with Title VI Standards

A. Consideration of Title VI impacts in developing service reduction scenarios:

1. In December 2002, staff confirmed with the Board of Directors its agency mission and goals leading to establishing three priorities for retaining District-provided transit services: (1) peak transbay services that help reduce traffic congestion on the Golden Gate Bridge; (2) off-peak transbay and other intercounty corridor services; and (3) local, intracounty services and out-of-corridor services funded by other, partner agencies. These priorities acknowledge the significant level of transit funding support provided by bridge toll payers and take into account the legal restriction on the use of bridge tolls to benefit intracounty travel. The District has lead responsibility to provide regional and intercounty transit

services – not local bus service. Both San Francisco and Sonoma counties have local bus operators. In Marin County, the District provides local bus service under an Agreement with the County of Marin and Marin County Transit District (MCTD). The County determines the level of local bus services and passenger fares.

2. In February of 2003, District staff developed various bus transit service reduction scenarios designed to provide a range of impacts from high congestion management to high mobility management, recognizing that tradeoffs between congestion and mobility would necessarily occur as a result of limited funding. Staff collected and analyzed transit service, ridership data and “front line” employee input in developing the scenarios. Staff worked cooperatively with MCTD staff and consultants to address mobility needs of Marin residents in the scenarios.
3. In developing three final scenarios, District staff recognized and identified minority, low-income communities in Marin according to 2000 census data. The tables in **Exhibits A-1** and **A-2** list census tracts in the GGT service area in Marin and Sonoma Counties, respectively, and indicate population according to race and ethnicity. **Exhibits A-3, A-4** and **A-5** are maps of the GGT service area in Marin County, Sonoma County, and Rohnert Park-Santa Rosa respectively, which show minority versus non-minority tracts as well as the GGT bus route structure. Staff analyzed the impact of the service reduction scenarios on Marin communities using measures of service frequency, hours and coverage. District staff evaluated each scenario’s impact on five communities with high numbers and proportion of low-income, minority population as identified in the 2000 census: Marin City, Canal neighborhood of San Rafael, Lincoln Avenue neighborhood north of downtown San Rafael, Ignacio area of Novato and the neighborhood west of downtown Novato. Specifically, District staff assessed whether any of the scenarios had a disparate impact on low-income, minority communities by the following transit service indicators: number of routes to serve these communities, number of major destinations that require additional transfers, vehicle headway, projected travel time and service span. District staff also evaluated service impact for seniors, transit dependents, and Marin County Grade 6 to 12 students. This analysis indicated that one of three transit service scenarios (Scenario C) would have a greater impact than the other two scenarios on low-income, minority communities – primarily as a result of proposed elimination of Route 10 in Marin City.

B. Outreach to minority and low-income communities:

1. In April of 2003, District staff undertook public outreach efforts to solicit public comments and feedback on the various scenarios. These efforts included five public workshops, one of them being in the Canal neighborhood of San Rafael.

On April 24, 2003, District staff presented an analysis of the various scenarios to a special meeting of the District’s Transportation Committee. This analysis included a summary and discussion of all public comments received, and evaluation of the impact of the various scenarios on low-income, minority communities. Based on the analysis described in Paragraph A.3., District staff concluded that the preferred Scenario E would have the least negative impact on protected communities. Accordingly, the Board endorsed Scenario E as the preferred scenario.

2. In May of 2003, District staff developed modifications to the preferred scenario based on public comments received and held three public hearings to again solicit public comments on the chosen service reduction plan. In addition, focused workshops were held in the minority, low-income communities of Marin City and the San Rafael Canal area to obtain further information on transit needs and possible impacts of service reductions on transit-dependent persons.
- C. Analysis of potential impacts of Scenario E on low-income and minority communities was undertaken in accordance with Title VI Program Guidelines for Urban Mass Transportation Administration Recipients (Circular 4702.1) issued by U.S. DOT. Specifically, measures of service effectiveness and quality were applied and compared to minority areas and non-minority areas within Marin County to determine if the proposed service reduction plan would disproportionately impact minorities. An overview of this analysis with some examples is provided in **Exhibit A-6**.

According to the 2000 census, Marin County is divided into 51 census tracts with a total of 247,289 people. The county's minority population is 53,035, or 21.4%, using U.S. Census definitions. Sixteen census tracts in Marin have a minority population greater than 21.4% (referred to hereinafter as "minority tracts"). About 2/3 of all minority residents live in these 16 census tracts. Tract 1122, which includes the Canal district of San Rafael, has the highest proportion of minorities, 84%, and the greatest number of minority persons, 9,758. It is a predominantly Hispanic district. Tract 1290, Marin City, has the second highest proportion of minorities, 66%. It is a small tract in southern Marin with a predominantly Black population. Tract 1220 has the third highest proportion of minorities, 65%, but its population is mostly San Quentin prison inmates and therefore is not included in the Title VI analysis. These three tracts are the primary minority residential areas in the county and comprise 29% of the minority population. Tract 1041.02, south-central Novato, has the fourth highest proportion of minorities, 36%. These tracts were therefore selected for Title VI service comparisons with representative non-minority tracts in geographic proximity: one in southern Marin, one in central Marin (San Rafael) and one in northern Marin (Novato). The following service comparison was made:

San Rafael-Canal area compared to Greenbrae
Marin City compared to Sausalito
South-central Novato compared to San Marin

II. ANALYSIS OF TRACT-TO-TRACT COMPARISON

- A. Amount of Service is measured by three attributes: number of routes, service frequency, and hours of service. Regarding number of routes, minority and non-minority tracts have comparable levels of service. Marin City is served by more routes than Sausalito due to the major transfer center located there.

The Canal area has more local service but less intercounty and commute service than does Greenbrae. This is due in part to the travel patterns of residents. Greenbrae residents are more likely to commute to jobs in downtown San Francisco, a trip pattern supported by transbay commute bus service. Also, Greenbrae benefits from being at the end of a long travel corridor leading to Highway 101; that is, commute buses serving Fairfax, San Anselmo, Ross and Kentfield all pass through Greenbrae and make stops there. Canal residents tend to work in a range of job locations. Therefore, the most effective service to this area is frequent service to the San Rafael Transit Center (SRTC), GGT's main transfer hub. At SRTC service is available in

all directions.

Novato minority Tract 1041.02 is served by more routes than the comparison north San Marin tract due in part to its more central location. Other Novato areas with a relatively high level of transit service are also minority tracts.

The analysis shows that frequency of service is generally comparable between minority and non-minority areas for travel locally within Marin County and for travel between Marin and San Francisco and Sonoma counties. Minority tracts receive slightly more frequent midday and non-commute service while non-minority tracts receive slightly more frequent transbay commute service to the San Francisco central business district. With regard to service duration, two of the minority tracts receive more hours of service than the comparison tracts. In the third comparison, service duration is the same.

- B. Passenger Fares are the same for minority and non-minority comparison tracts throughout the GGT service area.
- C. Service Efficiency is measured by two attributes: number of transfers and trip travel time. Regarding number of transfers, minority and non-minority tracts have comparable levels of service, with the non-minority passengers making slightly more transfers. Canal residents also tend to make more transfers than other passengers because of the variety and range of their travel patterns, and their proximity to the SRTC. Canal residents, however, have access to many transit routes and are able to complete trips in reasonable time.

Regarding travel time, Marin City residents can make swifter trips within Marin County. Their trips to San Francisco take slightly longer than trips from Sausalito since they are a bit further away on the same commute route.

Canal residents also make swifter trips within Marin County, but trips to San Francisco take substantially longer than trips from Greenbrae. A commute route formerly served the Canal, but this service was reduced and eventually eliminated due to low ridership. As noted above, Greenbrae benefits from accumulation of service that passes through four other communities on the way to the freeway. Travel times for south central Novato and north San Marin are basically equivalent. Trips to San Francisco take less time from south central Novato primarily because it is closer. Travel times to San Rafael are also similar; however, minority tract residents have access to bus pad bus services at the tract's border that can cut travel time in half.

While the Title VI analysis showed that service is generally comparable between minority and non-minority areas for travel locally within Marin County and for travel between Marin and San Francisco and Sonoma counties, additional information obtained through public input raised these concerns:

- Possible overloads were identified in the Canal area, despite a plan to obtain and deploy high-capacity articulated buses on Route 35.
- A need for late-night service was identified to accommodate off-peak work hours characteristic of service industry employees.
- A need for service in San Francisco outside of the central business district was identified to accommodate "reverse commute" and travel to medical facilities.

III. PROPOSED MITIGATION MEASURES

As a result of the extensive public outreach, the District revised its original Scenario E plan to re-deploy service and add-back service, particularly in areas where transit dependants were going to be hardest hit. An extensive outreach program in the Canal area of San Rafael and in Marin City resulted in a clear understanding that late night service and sufficient capacity on buses through the Canal area were of particular concern. The Modified Service Plan proposes bus service leaving San Francisco as late as 1:00 a.m. and adds service into the Canal area. Additionally, the District's marketing budget will be augmented in the upcoming budget year to include funds for development of an extensive and ongoing Spanish language materials program. As previously noted, the modifications added to the original Scenario E resulted in about 36,000 hours of service changes in the final version of Scenario E. About $\frac{3}{4}$ of the net increase of 12,000 service hours occurs on basic transbay and local bus routes used extensively by transit dependants.

To summarize, the modified service plan was developed to include:

- A. Restoration of (some) late-night service until 1 a.m.
- B. Additional capacity to respond to periods of peak transit ridership in the Canal and to/from the San Rafael Transit Center.
- C. Restoration of some direct service along the Geary Boulevard corridor in San Francisco.
- D. Restoration of some direct service to the Civic Center area of San Francisco.

IV. CONCLUSION

The foregoing summary provides an overview of the District's efforts to identify and address any disproportionate impacts on minority and low-income transit users, compared to the District's transit ridership as a whole, due to the proposed service changes. The District undertook a detailed, iterative process to analyze transit ridership needs, utilization and demographics in order to develop alternative service reduction scenarios that were vetted with affected communities through an extensive public involvement program that included meetings, workshops, hearings and written communications. Minority and low-income groups participated in substantial numbers and provided meaningful feedback on these proposals. As one outcome of the process, barriers in communication with non-English speaking transit users were identified, and the District responded quickly by adding interpretive services and augmenting its budget for translation of transit service information into Spanish.

The proposed Modified Service Plan reflects a careful weighing of the interests, needs, economics, and equities of serving a complex and diverse transit population. The District's fiscal emergency dictates significant cutbacks in transit service that will necessarily burden all users of the transit system. The District has incorporated mitigation and enhancement measures to offset these negative effects, taking into account in particular the needs of its transit-dependent customers. As a result of a careful and vigorous analysis, the District has concluded that implementation of these substantial reductions will not result in adverse and disproportionately high effects on the low-income, minority populations that it serves.

Attachments to Title VI Analysis of GGT Bus Service Reduction – Modified Scenario E

- Exhibit A-1** Marin Census Tracts in the GGT Service Area
- Exhibit A-2** Sonoma Census Tracts in the GGT Service Area
- Exhibit A-3** Map of GGT Service Area in Marin County
- Exhibit A-4** Map of GGT Service Area in Sonoma County
- Exhibit A-5** Map of GGT Service Area in Rohnert Park-Santa Rosa

Exhibit A-6 Transit Service Comparison for 3 Pairs of Minority v. Non-Minority Tracts