Agenda Item No. (8)

To: Finance-Auditing Committee/Committee of the Whole
Meeting of June 26, 2025

From: Ron Downing, Director of Planning
Kellee J. Hopper, Deputy General Manager, Administration and Development
Jennifer H. Mennucci, Auditor-Controller
Denis J. Mulligan, General Manager

Subject: **ADOPT THE TITLE VI EQUITY ANALYSIS OF THE NO-COST OR REDUCED COST INTERAGENCY TRANSFER PILOT PROGRAM**

Recommendation

The Finance-Auditing Committee recommends that the Board of Directors (Board) adopt the findings of the Title VI Equity Analysis associated with the No-Cost or Reduced Cost Interagency Transfer Pilot Program (Pilot Program) proposed by the Metropolitan Transportation Commission (MTC).

This matter will be presented to the Board of Directors at its June 27, 2025, meeting for appropriate action.

Background

At its March 28, 2025, meeting, the Board approved participation in the Pilot Program, as stated in Ordinance No. 2025-001 of the Board. The Pilot Program will offer a more seamless and cost-effective experience for riders using Clipper® electronic fare payment when transferring between participating agencies.

Under the Pilot Program, passengers will pay the full fare on the first transit vehicle they board. Any transfer to a different participating transit agency within two hours, or within three hours if the originating trip is on Golden Gate Transit (GGT), Sonoma-Marin Area Rail Transit (SMART), or Sonoma County Transit, will be discounted up to $2.85 for adult fares and $1.40 for discounted fares (Youth, Senior, Regional Transit Connection, and Clipper® START). Should the highest local bus or light rail transit fare increase above $2.85 during the Pilot Program, the amount of the discount offered will increase to match the new highest local transit fare. The Pilot Program is expected to commence at the launch of Clipper® 2.0, currently scheduled for later in 2025. Implementation of this Pilot Program is anticipated to facilitate interagency transfers and increase transit ridership among the 22 Bay Area agencies who participate in Clipper®.

Title VI Equity Analysis

The Federal Transit Administration regulations and guidance implementing Title VI of the Civil Rights Act of 1964, as well as the Golden Gate Bridge, Highway and Transportation District's (District) Title VI Policies, require that a Title VI Equity Analysis be performed to determine whether certain proposed fare and service changes will disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area. Staff conducted a Title VI Equity Analysis to determine whether the establishment of the Pilot Program would result in a disparate impact to minority populations or impose a disproportionate burden on low-income populations.

Overall, the analysis concludes that no disproportionate burden on low-income populations nor disparate impact on minority populations will result from the Pilot Program.

The detailed Title VI Equity Analysis for the Pilot Program is shown in Appendix A.

Fiscal Impact

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

Attachment: Appendix A: Title VI Equity Analysis

APPENDIX A
Title VI Equity Analysis: No-Cost and Reduced Cost Interagency Transfer Pilot Program
Presented to the Golden Gate Bridge, Highway and Transportation District
Finance-Auditing Committee
June 26, 2025

I. Background

In April 2024, the Metropolitan Transportation Commission (MTC) approved implementation of a Pilot No-Cost and Reduced Cost Interagency Transfer Program (Pilot Program), under the rollout of Clipper® 2.0. The goal of the Pilot Program is to strengthen, standardize, and clarify transfer discounts between Bay Area transit operators. The Pilot Program is also expected to increase transit ridership. The Pilot Program would provide a discount of up to $2.85 for adult fares and $1.40 for discounted fares (Youth, Senior, Persons with Disabilities, Medicare discounts, and Clipper START) on any ride after transferring from any agency participating in the Clipper program.

The Pilot Program would provide a discount equivalent to the single-ride Clipper fare for amounts up to the region's highest local bus/light rail transit fare, which is $2.85 as of July 1, 2025. When making a trip on fixed-route transit that requires transferring between participating operators, riders would pay the full fare on the first operator used. Any transfer to another operator within two hours (three hours if the originating trip is on Golden Gate Transit, SMART, or Sonoma County Transit) of the first boarding is free up to a per-transfer limit equal to the highest local transit fare of agencies participating in the Pilot Program. Should the highest local bus/light rail transit fare increase above $2.85 during the Pilot Program, the amount of the discount offered will increase to match the new highest local transit fare.

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

II. Adopted District Title VI Policies

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

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

The District's Disproportionate Burden Policy provides:

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

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

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

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

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

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

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

III. Golden Gate Transit Bus and Golden Gate Ferry Services

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

Golden Gate Transit Bus Services

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

- *Transbay Commute Service* provides commute service during morning and afternoon peak-hour periods. Commute routes operate Monday through Friday, except designated holidays, and serve San Francisco, Marin, and Sonoma counties. Commute routes include Routes 114, 132, 154, 164, 172, and 172X.
- *Transbay Regional Service* provides daily service throughout the day and evening between San Francisco, Marin, Sonoma, and Contra Costa counties. Basic routes include Routes 101, 130, 150, 580, and 580X. Routes 580 and 580X service, which operates between Marin and Contra Costa Counties, is supported by both MTC Regional Measure 2 and Regional Measure 3 funds.

Golden Gate Ferry Services

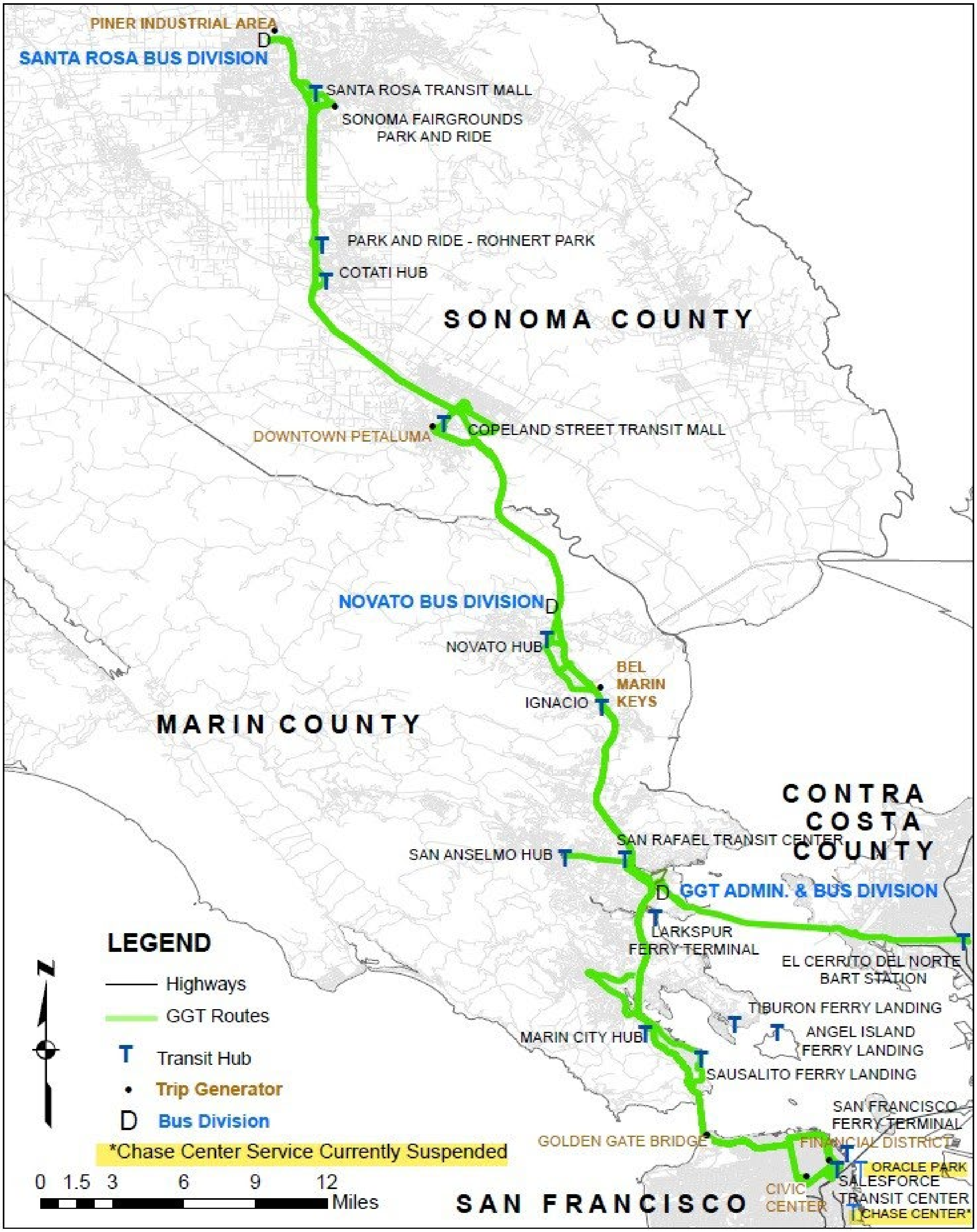
The District's GGF service includes five routes between Marin County and San Francisco: Sausalito, Larkspur, Tiburon commute service, Angel Island service, and Special Event service to Oracle Park. Special Event service to Chase Center in San Francisco was suspended in 2020 and has not resumed. Regular Ferry service operates daily except on Thanksgiving, Christmas, and New Year's Day.

- *Sausalito Ferry Service* provides daily connections between the GGF landing in Sausalito and the San Francisco Ferry Terminal. This 5.5 nautical-mile route has been in operation since 1970 and currently provides 14 crossings on weekdays and 10 crossings on weekends and holidays. The service operates between 7:05 a.m. and 7:45 p.m. on weekdays, and between 10:15 am and 7:25 p.m. on weekends and holidays.
- *Larkspur Ferry Service* features an 11.25 nautical-mile route between the Larkspur Ferry Terminal and the San Francisco Ferry Terminal. The 32 weekday and 15 weekend/holiday crossings require a fleet of five vessels. Services operate between 6:00 a.m. and 8:30 p.m. on weekdays, and between 9:00 a.m. and 8:45 p.m. on weekends and holidays.
- *Tiburon Ferry Service* provides 13 weekday crossings and seven weekend/holiday crossings. Services operate between 6:35 a.m. and 6:35 p.m. on weekdays and between 11:50 a.m. and 5:40 p.m. on weekends and holidays. This 6.84 nautical-mile route was previously operated by the Blue and Gold Fleet since 1997 and before that by the Red and White Fleet.

- *Special Event Service to Oracle Park* is offered during all San Francisco Giants' home games and some special events. The 13.1 nautical-mile route between the Larkspur Ferry Terminal and the dock at Oracle Park requires approximately 60 minutes. One round trip is offered for each event served, which typically totals between 80 and 90 trips per year.
- *Angel Island Ferry Service* currently provides eight weekday crossings and six weekend and holiday crossings between the GGF landing in Angel Island and the San Francisco Ferry Terminal. Services operate between 9:25 a.m. and 5:00 p.m. on weekdays and between 10:15 a.m. and 5:35 p.m. on weekends and holidays. This 6.7 nautical-mile route has been in operation since 2021.

The proposed Pilot Program will not apply to Special Event GGF service to Oracle Park or to the District's regional paratransit service designed to complement GGT's regional, non-commute bus service, and therefore these services are not included in this analysis.

EXHIBIT 1: 2021-2024 GOLDEN GATE TRANSIT SERVICE AREA OVERVIEW



IV. Public Outreach for the Proposed No-Cost and Reduced Cost Interagency Transfer Program

Public Notification

Outreach on the proposal to participate in the Pilot Program began on January 24, 2025 after the Board authorized the public hearing on February 27, 2025 and continued into late February prior to the public hearing.
Public notification activities included:

- A Notice of Public Hearing was posted to the District's website;
- Public hearing notices were published in local publications (*Marin Independent Journal, Santa Rosa Press Democrat, San Francisco Chronicle,* and *La Voz);*
- Posters advertising the public hearing were placed onboard buses and ferries;
- Social media posts on Facebook and X promoted the public hearing; and
- Email blasts were sent to customers and community-based organizations.

Printed materials were available in Spanish, per the District's Language Implementation Plan (LIP).

Public Comment Process

Public comments on this proposal to participate in the Pilot Program were accepted in several different ways:

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

The District's practice is to treat all comments equally without regard to the manner in which the comments are submitted or received. Therefore, individuals did not have to attend the public hearing and provide testimony in person if they commented through e-mail or written forms. All comments received through the above methods were considered in the final recommendation. The deadline for comments to received was 4:30 p.m. on Friday February 28, 2025.

Comments received prior to the public hearing: two (2) comments were received in support of the Pilot Program. No public comments were submitted during the public hearing on February 27, 2025. When the public hearing comment period closed on Friday, February 28, 2025, at 4:30 p.m., no additional comments had been received, bringing the total to two (2) comments in support of the Pilot Program.

V. Title VI Equity Analysis Methodology

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

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

Staff developed and applied the following methodology:

1. Identify Ridership Data Source: *2023 District System-Wide Survey*

In 2023, the District conducted a comprehensive system-wide survey of riders and non-riders. The District's consultant surveyed all the District's services, including GGT and GGF. Data was collected on board a sample of bus and ferry trips. Questionnaires were in Spanish and English and included questions about the trip being taken and demographics.

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

As described above, terms of the District's proposed participation in the Pilot Program would provide a discount equivalent to the single-ride Clipper fare for amounts up to the region's highest local bus/light rail transit fare, which is $2.85 as of July 1, 2025 ($1.40 for discount fare categories). The proposed free and reduced-cost fares would only be available through the use of a Clipper card.

Accordingly, all fare payment media and fare types for the affected services were examined for the level of use by low-income and minority patrons. The media and fare types examined were: Adult Cash fare, Senior/Youth/Persons with Disabilities/Medicare ("Discount") Cash fare, Adult Clipper fare, Senior/Youth/Persons with Disabilities/Medicare ("Discount") Clipper fare, Clipper START fare, and Adult and Discount transfer for both Cash and Clipper fares.

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

3. Define the term "low-income" as those with an annual household income at or below $75,000, which is approximately 90% of the median for the service area.

Marin County and Sonoma Counties, which are included in the District's service area, have a comparatively high income (median income was $135,341 for Marin County and $90,240 for

Sonoma County as of the 2018-2022 American Community Survey). In the District's most recent Title VI Program, District staff used $75,000 for the annual income cut-off for defining low income for Marin County and Sonoma County. This figure is derived by taking 90% of the median annual income by census tract using the most recent statistics available. For this equity analysis, staff decreased the low-income threshold to $75,000, which is the closest income strata break in the survey data, and which provides a more protective assessment of disproportionate burden for lower-income earners.

4. Define the term "minority" to mean those who self-identified as any ethnicity other than "white" alone in the 2023 District System-Wide Survey.

5. Determine the usage of each fare product by minority, non-minority, low-income and non-low-income riders.

6. Determine whether the Pilot Program's fare changes will have a disparate impact on low-income populations or a disproportionate burden on minority populations based on the District's Title VI policies.

VI. Title VI Equity Analysis Findings

Impacts of proposed fare changes were analyzed separately for GGT and GGF because they constitute separate fare systems.

1. GGT Bus Fare Equity Analysis

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

1. The zone pair (origin and destination);
2. The fare category (Adult, Clipper START, or Discount-Youth, Senior, Persons with Disabilities or Medicare); and
3. The fare media (Cash, Clipper or Transfer).

Adult category passengers receive a discount when using the Clipper card, so Clipper and cash adult fares are different. As referenced above, because Senior, Youth, RTC, and Clipper START category riders are already receiving a discount, the Clipper fare for these categories is not discounted further and is the same as the cash fare. However, since Clipper users will receive a transfer discount and Cash users will not, discount category Clipper transfers and Cash transfers are analyzed separately. Clipper START users are shown as a separate fare type.

When paying with cash or Clipper, riders currently receive up to two free transfers when riding GGT or Marin Transit buses or when riding between GGT and GGF. Transfers are valid for two hours when riding within a single county or for three hours when riding between counties. Transfers between GGT and GGF are not reflected in the "Adult Transfer" and "Discount Transfer" categories for either cash or Clipper users. Since the transfer rules for transfers between Golden

Gate Transit buses and between Golden Gate Transit and Golden Gate Ferry will remain the same under the proposed Pilot Program, such transfers are not addressed in the current analysis. For this analysis, an "Adult Transfer" is a ride where the passenger transferred from another transit system to GGT or GGF, whether they received a discount under current conditions or not. A "Discount Transfer" is a discounted transfer fare for a customer who paid a Discount fare (Clipper START, Youth, Senior, Persons with Disabilities or Medicare fare) on their initial ride on another transit system before riding GGT or GGF, whether they received a transfer discount under current conditions or not.

First, using data from the 2023 District System-Wide Survey, staff compared percentages of minority riders to non-minority riders by fare media and fare payment category, as well as system-wide. For the 2023 District System-Wide Survey, 1,278 bus passengers provided responses to all questions required for the analysis below. As demonstrated in Table 1,604 out of 1,278 GGT riders (47.26%) self-identified as belonging to an ethnic minority, and 674 (52.74%) identified as non-minority. The far right column in Table 2 shows that the most frequently used fare payment type on GGT is an adult Clipper fare, used by 58.06% of all customers. Following that are Clipper Adult Transfer, used by 11.89%, and Cash Adult and Clipper Discount, both used by 11.35% of customers.

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

Payment Type		Minority	Non-Minority	Total
Cash	Adult	101	44	145
	Discount	30	24	54
Cash Transfer	Adult	11	4	15
	Discount	3	5	8
Clipper	Adult	329	413	742
	Start	0	0	0
	Discount	59	86	145
Clipper Transfer	Adult	65	87	152
	Discount	6	11	17
Grand Total		604	674	1278

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

Payment Type		Minority	Non-Minority	Total
Cash	Adult	7.90%	3.44%	11.35%
	Discount	2.35%	1.88%	4.23%
Cash Transfer	Adult	0.86%	0.31%	1.17%
	Discount	0.23%	0.39%	0.63%
Clipper	Adult	25.74%	32.32%	58.06%
	Start	0.00%	0.00%	0.00%
	Discount	4.62%	6.73%	11.35%
Clipper Transfer	Adult	5.09%	6.81%	11.89%
	Discount	0.47%	0.86%	1.33%
Grand Total		47.26%	52.74%	100%

Applying the same type of analysis to income status, Tables 3 and 4 show that of 1,281 riders responding to the income question on the survey, 625 or 48.79% identified themselves as having a household income of $75,000 or less and are considered low-income. Further, 656 riders (51.21%) responded as having an annual income over $75,000.

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

Payment Type		Low-Income	Non-Low-Income	Total
Cash	Adult	109	31	140
	Discount	41	14	55
Cash Transfer	Adult	16	4	20
	Discount	10	1	11
Clipper	Adult	269	496	765
	Start	3	4	7
	Discount	83	57	140
Clipper Transfer	Adult	83	44	127
	Discount	11	5	16
Grand Total		625	656	1281

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

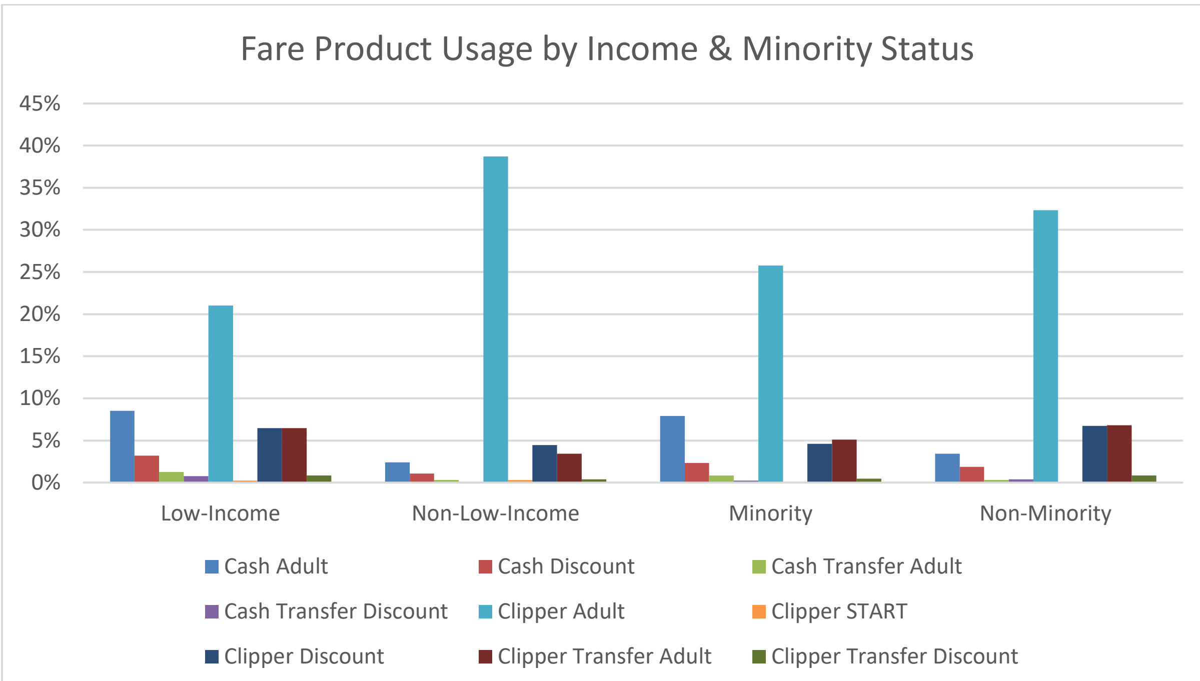
Payment Type		Low-Income	Non-Low-Income	Total
Cash	Adult	8.51%	2.42%	10.93%
	Discount	3.20%	1.09%	4.29%
Cash Transfer	Adult	1.25%	0.31%	1.56%
	Discount	0.78%	0.08%	0.86%
Clipper	Adult	21.00%	38.72%	59.72%
	Start	0.23%	0.31%	0.55%
	Discount	6.48%	4.45%	10.93%
Clipper Transfer	Adult	6.48%	3.43%	9.91%
	Discount	0.86%	0.39%	1.25%
Grand Total		48.79%	51.21%	100%

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

Graph 1 shows the use of each fare payment type for each category of riders: low-income, non-low-income, minority, and non-minority. The graph shows clearly that Adult Clipper is the most-used fare medium for all categories. Survey data recorded very few passengers using Clipper START, and this is also reflected in the graph. It’s also notable that Cash Adult is used more often by minority and low-income riders than by non-minority and non-low-income riders.

For low-income riders, 71.84% use Clipper, whether transferring or not, and whether paying an Adult or discount fare. Very similarly, among minority riders, 75.99% use Clipper, whether transferring or not, and whether paying an Adult or discount fare. 19.2% of low-income riders are transferring from another transit system, compared to 8.23% of non-low-income riders. 14.07% of minority riders are transferring from another transit system, compared to 15.88% of non-minority riders. A higher percentage of transfer riders pay Adult fares than discount fares, and Clipper transfers are much more common than cash transfers across all categories (low-income, non-low-income, minority, and non-minority).

Graph 1: Bus Fare Product Usage Comparison



To determine whether the impact of the fare discount will be felt proportionally by low-income riders, or rather, whether a disproportionate burden exists, staff compared the difference between the percentage of the fare discount that is anticipated to benefit low-income riders and the percentage of low-income riders in the overall ridership.

In addition, to determine whether the impact of the discount will be felt proportionally by minority riders, or rather, whether a disparate impact exists, staff compared the difference between the percentage of the fare discount that is anticipated to benefit minority riders and the percentage of minority riders in the overall ridership.

Table 5: Low Income and Non-Low Income - GGT Disproportionate Burden Analysis

% Low Income in Overall Ridership	% of Fare Discount Benefiting Clipper Transfer Low-Income Riders	% of Non-Low-Income in Overall Ridership	% of Fare Discount benefiting Non-Low-Income Clipper Transfer Riders	Difference between benefit to Clipper transfer low-income riders and proportion of Low-Income Riders	Disproportionate Burden?
48.79%	65.2%	51.21%	34.80%	16.41%	No

Table 6: Minority and Non-Minority - GGT Disparate Impact Analysis

% Minority in Overall Ridership	% of Fare Discount benefiting Clipper Transfer Minority Riders	% Non-Minority in Overall Ridership	% of Fare Discount benefiting Non-Minority Clipper Transfer Riders	Difference between benefit to Clipper transfer Minority Riders and proportion of Minority riders	Exceeds Disparate Impact Threshold? (>10%)
47.26%	41.7%	52.74%	58.3%	-5.57%	No

The positive impact of this fare proposal will be enjoyed by a greater proportion of low-income riders than their share of the overall ridership, by 16.41%. While low-income riders are 48.79% of the ridership, Clipper transfer low-income riders are anticipated to receive 65.2% of the benefit of the program in the form of decreased fares. Because this is a fare *discount* program, the differential of 16.41%, which exceeds the District's disproportionate burden threshold of 10%, means that low-income riders are *benefitting* disproportionately from the new program in a positive manner. Therefore, the proposal does not constitute a disproportionate burden on low-income riders.

Minority riders are 47.26% of the ridership, and Clipper transfer minority riders are anticipated to receive 41.7% of the benefit of the Pilot Program in the form of reduced fares. Accordingly, the Pilot Program will disproportionately benefit non-minority riders by 5.57%. However, since the disparate impact threshold is 10%, this proposal would not create a disparate impact on minority riders.

2. GGF Fare Equity Analysis

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

1. The ferry route (Sausalito, Larkspur, Tiburon, Angel Island);
2. The fare category (Adult, Clipper START, or Discount-Youth, Senior, Persons with Disabilities or Medicare); and
3. The fare media (Cash, Clipper or Transfer).

Limited Use Tickets allow passengers to purchase with cash a one-way fare, which is the fare media that replaced cash for Ferry in 2011. As such, these fares will be represented by the label "Cash" in the tables for brevity's sake. Adult category passengers receive a discount when using the Clipper card, so Clipper and cash fares are different for Adult passengers. Just as with GGT, the Discount fare is the same when paying with cash or when using a Clipper card. However, in the No-Cost and Reduced Cost Transfer Program, Clipper users will derive a benefit that cash users will not, so Cash Discount and Clipper Discount users are treated separately for this analysis.

Using data from the 2023 District System-Wide Survey, staff compared percentages of minority riders to non-minority riders by fare payment category as well as system-wide.

Tables 7 and 8 below show that 756 ferry passengers provided responses to all questions required for the analysis below. 79 Sausalito riders, 80 Larkspur riders, 17 Tiburon riders, and 31 Angel Island riders self-identified as an ethnic minority, representing a total of 207 passengers or 27.38%. Additionally, 189 Sausalito riders, 258 Larkspur riders, 68 Tiburon riders, and 34 Angel Island riders identified as non-minority, representing a total of 549 passengers or 72.62%.

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

			Minority	Non-Minority	Total
Sausalito Ferry	Cash	Adult	11	43	54
		Discount	0	10	10
	Cash Transfer	Adult	5	3	8
		Discount	0	1	1
	Clipper	Adult	49	95	144
		Start	3	1	4
		Discount	2	11	13
	Clipper Transfer	Adult	8	21	29
		Discount	1	4	5
Larkspur Ferry	Cash	Adult	4	25	29
		Discount	0	11	11
	Cash Transfer	Adult	1	6	7
		Discount	1	2	3
	Clipper	Adult	55	164	219
		Start	0	1	1
		Discount	6	14	20
	Clipper Transfer	Adult	11	27	38
		Discount	2	8	10
Tiburon Ferry	Cash	Adult	1	4	5
		Discount	0	0	0
	Cash Transfer	Adult	0	0	0
		Discount	0	0	0
	Clipper	Adult	11	57	68
		Start	0	0	0
		Discount	0	1	1
	Clipper Transfer	Adult	4	6	10
		Discount	1	0	1
Angel Island Ferry	Cash	Adult	1	5	6
		Discount	3	0	3
	Cash Transfer	Adult	0	4	4
		Discount	0	3	3
	Clipper	Adult	16	10	26
		Start	0	0	0
		Discount	3	3	6
	Clipper Transfer	Adult	7	7	14
		Discount	1	2	3
		Total	207	549	756

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

			Minority	Non-Minority	Total
Sausalito Ferry	Cash	Adult	1.46%	5.69%	7.14%
		Discount	0.00%	1.32%	1.32%
	Cash Transfer	Adult	0.66%	0.40%	1.06%
		Discount	0.00%	0.13%	0.13%
	Clipper	Adult	6.48%	12.57%	19.05%
		Start	0.40%	0.13%	0.53%
		Discount	0.26%	1.46%	1.72%
	Clipper Transfer	Adult	1.06%	2.78%	3.84%
		Discount	0.13%	0.53%	0.66%
Larkspur Ferry	Cash	Adult	0.53%	3.31%	3.84%
		Discount	0.00%	1.46%	1.46%
	Cash Transfer	Adult	0.13%	0.79%	0.93%
		Discount	0.13%	0.26%	0.40%
	Clipper	Adult	7.28%	21.69%	28.97%
		Start	0.00%	0.13%	0.13%
		Discount	0.79%	1.85%	2.65%
	Clipper Transfer	Adult	1.46%	3.57%	5.03%
		Discount	0.26%	1.06%	1.32%
Tiburon Ferry	Cash	Adult	0.13%	0.53%	0.66%
		Discount	0.00%	0.00%	0.00%
	Cash Transfer	Adult	0.00%	0.00%	0.00%
		Discount	0.00%	0.00%	0.00%
	Clipper	Adult	1.46%	7.54%	8.99%
		Start	0.00%	0.00%	0.00%
		Discount	0.00%	0.13%	0.13%
	Clipper Transfer	Adult	0.53%	0.79%	1.32%
		Discount	0.13%	0.00%	0.13%
Angel Island Ferry	Cash	Adult	0.13%	0.66%	0.79%
		Discount	0.40%	0.00%	0.40%
	Cash Transfer	Adult	0.00%	0.53%	0.53%
		Discount	0.00%	0.40%	0.40%
	Clipper	Adult	2.12%	1.32%	3.44%
		Start	0.00%	0.00%	0.00%
		Discount	0.40%	0.40%	0.79%
	Clipper Transfer	Adult	0.93%	0.93%	1.85%
		Discount	0.13%	0.26%	0.40%
		Grand Total	27.38%	72.62%	100%

As with the GGT bus fares analysis, staff compared the percentage of minority riders vs. non-minority riders and overall percentages for passenger ethnicity data for all fare products, and in particular, those who transferred from another transit agency to GGF.

Staff also compared the percentage of low-income riders vs. non-low-income riders and overall percentages for passenger income data for all fare products. Applying the same type of analysis to income categories as to minority status, Tables 9 and 10 show that 748 riders responded to the income question on the survey. Of these passengers, 53 Sausalito riders, 43 Larkspur riders, 6 Tiburon riders, and 10 Angel Island riders identified themselves as having a household income of less than $75,000, for a total of 112 passengers or 14.97% of all ferry riders. In addition, 212 Sausalito riders, 293 Larkspur riders, 79 Tiburon riders, and 52 Angel Island riders, for a total of 636, or 85.03%, responded as having an annual income over $75,000.

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

			Low-Income	Non-Low Income	Total
Sausalito Ferry	Cash	Adult	11	44	55
		Discount	2	9	11
	Cash Transfer	Adult	4	3	7
		Discount	0	0	0
	Clipper	Adult	27	118	145
		Start	1	0	1
		Discount	4	11	15
	Clipper Transfer	Adult	4	24	28
		Discount	0	3	3
Larkspur Ferry	Cash	Adult	6	24	30
		Discount	3	8	11
	Cash Transfer	Adult	2	4	6
		Discount	0	2	2
	Clipper	Adult	14	210	224
		Start	0	0	0
		Discount	4	19	23
	Clipper Transfer	Adult	10	23	33
		Discount	4	3	7
Tiburon Ferry	Cash	Adult	1	4	5
		Discount	0	0	0
	Cash Transfer	Adult	0	0	0
		Discount	0	0	0
	Clipper	Adult	2	68	70
		Start	0	0	0
		Discount	0	2	2
	Clipper Transfer	Adult	3	5	8
		Discount	0	0	0
Angel Island Ferry	Cash	Adult	0	6	6
		Discount	0	1	1
	Cash Transfer	Adult	2	2	4
		Discount	1	1	2
	Clipper	Adult	2	25	27
		Start	0	0	0
		Discount	1	5	6
	Clipper Transfer	Adult	3	11	14
		Discount	1	1	2
		Total	112	636	748

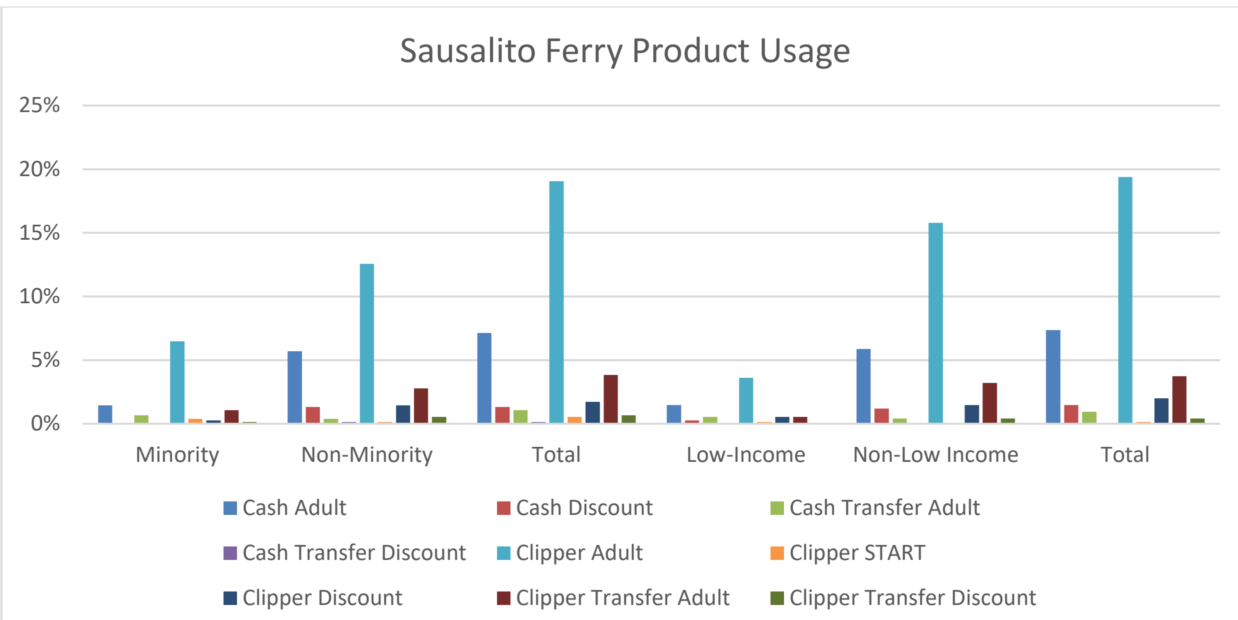
Table 10: Ferry Fare Product Usage by Percentage— Low-Income vs. Non-Low Income

			Low-Income	Non-Low Income	Total
Sausalito Ferry	Cash	Adult	1.47%	5.88%	7.35%
		Discount	0.27%	1.20%	1.47%
	Cash Transfer	Adult	0.53%	0.40%	0.94%
		Discount	0.00%	0.00%	0.00%
	Clipper	Adult	3.61%	15.78%	19.39%
		Start	0.13%	0.00%	0.13%
		Discount	0.53%	1.47%	2.01%
	Clipper Transfer	Adult	0.53%	3.21%	3.74%
		Discount	0.00%	0.40%	0.40%
Larkspur Ferry	Cash	Adult	0.80%	3.21%	4.01%
		Discount	0.40%	1.07%	1.47%
	Cash Transfer	Adult	0.27%	0.53%	0.80%
		Discount	0.00%	0.27%	0.27%
	Clipper	Adult	1.87%	28.07%	29.95%
		Start	0.00%	0.00%	0.00%
		Discount	0.53%	2.54%	3.07%
	Clipper Transfer	Adult	1.34%	3.07%	4.41%
		Discount	0.53%	0.40%	0.94%
Tiburon Ferry	Cash	Adult	0.13%	0.53%	0.67%
		Discount	0.00%	0.00%	0.00%
	Cash Transfer	Adult	0.00%	0.00%	0.00%
		Discount	0.00%	0.00%	0.00%
	Clipper	Adult	0.27%	9.09%	9.36%
		Start	0.00%	0.00%	0.00%
		Discount	0.00%	0.27%	0.27%
	Clipper Transfer	Adult	0.40%	0.67%	1.07%
		Discount	0.00%	0.00%	0.00%
Angel Island Ferry	Cash	Adult	0.00%	0.80%	0.80%
		Discount	0.00%	0.13%	0.13%
	Cash Transfer	Adult	0.27%	0.27%	0.53%
		Discount	0.13%	0.13%	0.27%
	Clipper	Adult	0.27%	3.34%	3.61%
		Start	0.00%	0.00%	0.00%
		Discount	0.13%	0.67%	0.80%
	Clipper Transfer	Adult	0.40%	1.47%	1.87%
		Discount	0.13%	0.13%	0.27%
		Total	14.97%	85.03%	100%

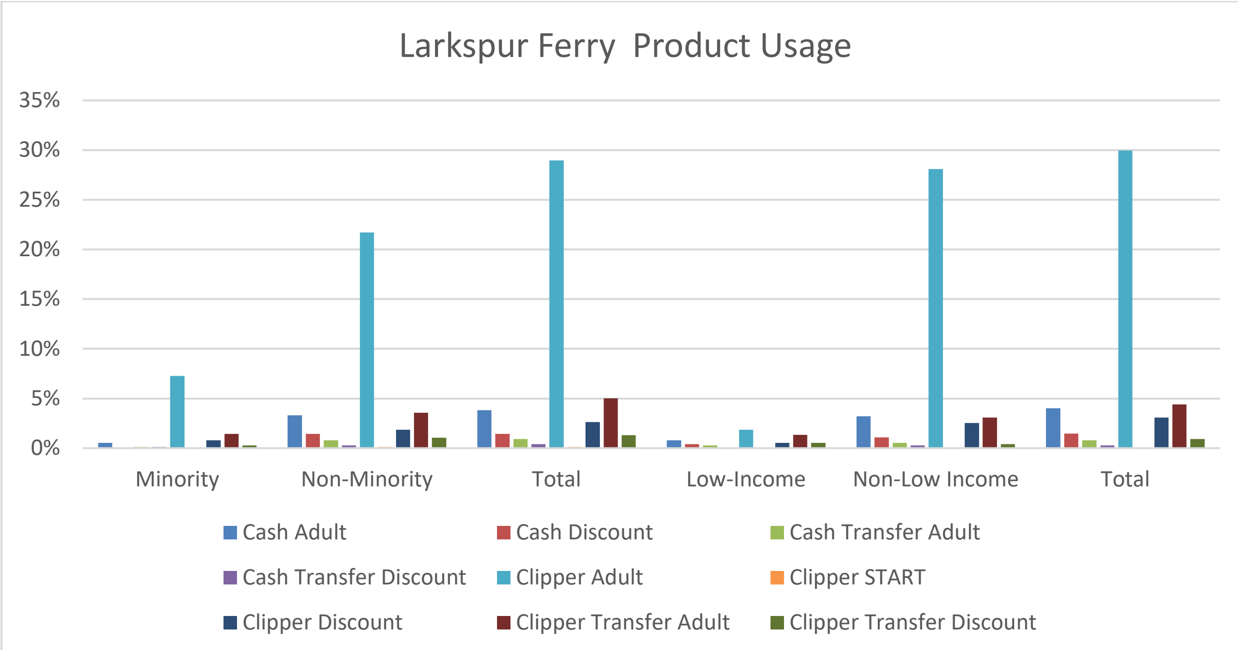
Graphs 2, 3, and 4 show the frequency of use of each fare payment type on Sausalito, Larkspur, Tiburon, and Angel Island ferry services for each category of riders: minority, non-minority, low-income, and non-low-income, by ferry route. For each ferry route, Clipper usage is high, with Adult Cash taking second place for Sausalito and Adult Transfer taking second place for Larkspur, Tiburon, and Angel Island ferries. Clipper START is the least used fare medium on all four ferries. 63.29% of Minority riders pay a Clipper Adult fare, and 14.49% are paying with Clipper and transferring from another transit system. 8.21% pay an Adult Cash fare, and 5.31% pay a Clipper Discount fare. 40.18% of Low-income riders pay a Clipper Adult fare, 17.86% pay with an Clipper and transfer from another transit system, 16.07% pay an Adult Cash fare, 8.04% pay a Clipper Discount fare, and 7.14% pay with an Adult Cash transfer.

Looking at customers who transfer to Golden Gate Ferry from another transit system, 16.91% of Minority customers, 13.66% of Non-Minority customers, 22.32% of Low-Income customers, and 12.7% of Non-Low-Income customers are transferring from another transit agency. These are the customers who stand to benefit by the Pilot Program.

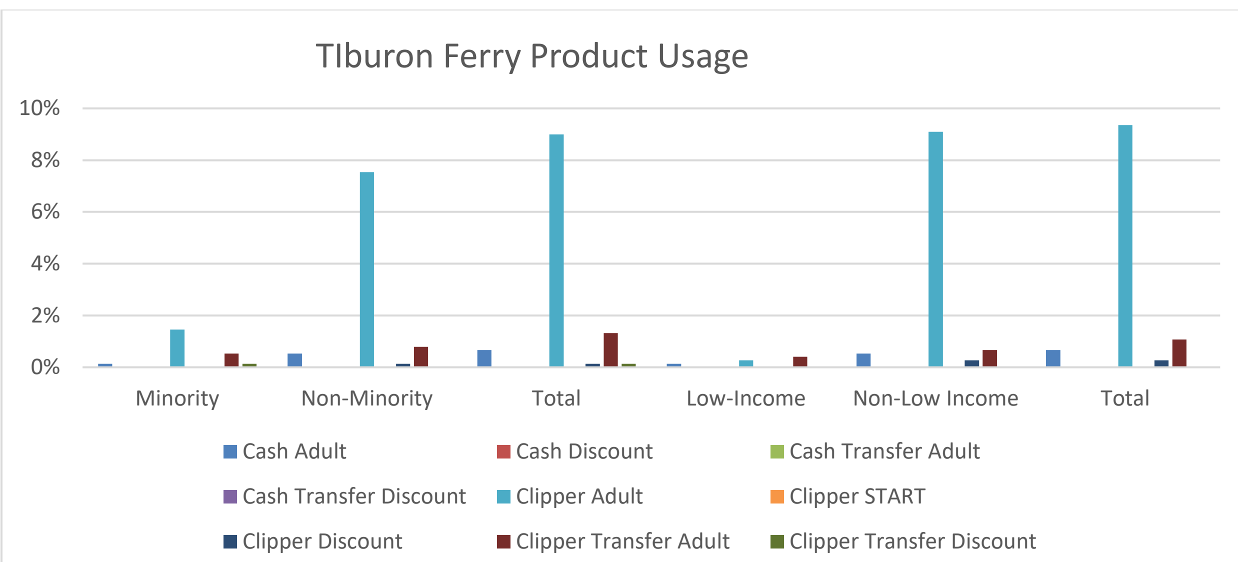
Graph 2: Sausalito Ferry Product Usage by Demographic Group



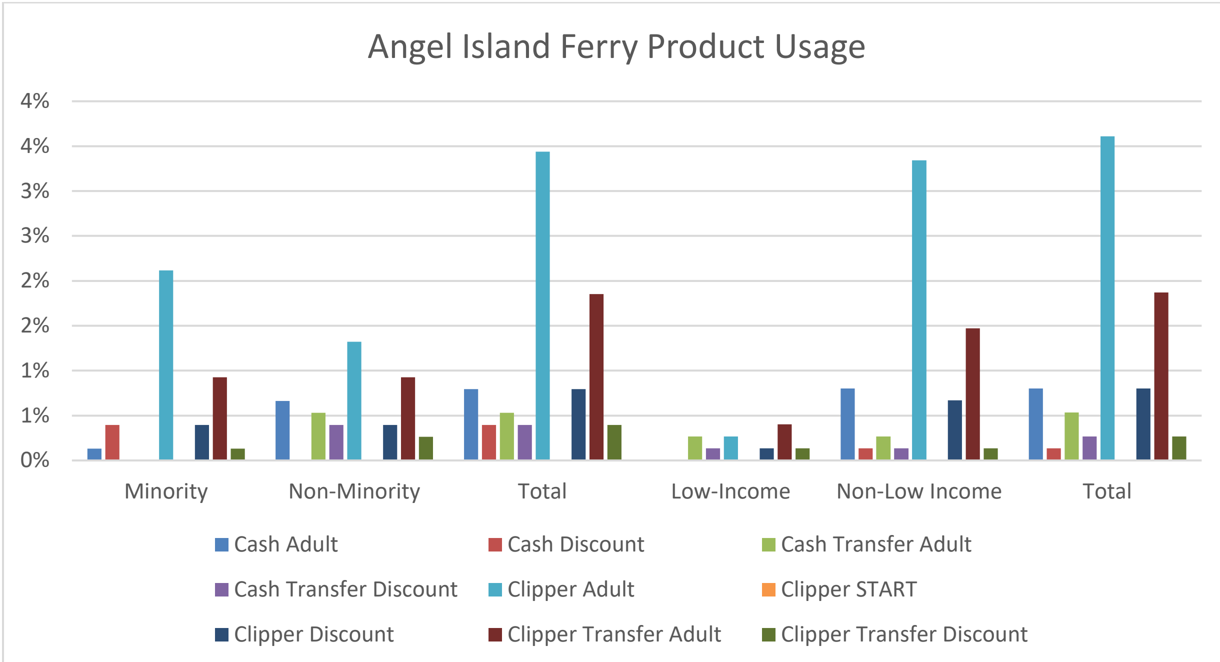
Graph 3: Larkspur Ferry Product Usage by Demographic Group



Graph 4: Tiburon Ferry Product Usage by Demographic Group



Graph 5: Angel Island Ferry Product Usage by Demographic Group



Based on the tables and charts above, the disproportionate burden analysis shows whether the impact of the discount will be felt proportionally by low-income riders or whether a disproportionate burden on low-income riders exists by comparing the percentage of the fare discount that is anticipated to benefit low-income riders to the percentage of low-income riders in the overall ridership. Similarly, the disparate impact analysis shows whether the impact of the discount will be felt proportionally by minority riders or whether a disparate impact on minority riders exists by comparing the percentage of the fare discount that is anticipated to benefit minority riders and the percentage of minority riders in the overall ridership.

The tables below depict the difference in impact for each rider category (low-income or minority) compared to that category's representation among ferry ridership:

Table 11: Ferry Fare Impact Summary—Low Income and Non-Low-Income for GGF Disproportionate Burden Analysis

% Low-Income in Overall Ridership	% of fare discount benefiting Low-Income Clipper transfer riders	% of Non-Low-Income in Overall Ridership	% of fare discount benefiting Non-Low-Income Riders	Difference between l benefit to Clipper transfer low income riders and proportion of Low-Income Riders overall	Disproportionate Burden?
14.74%	25.26%	85.26%	74.74%	10.52%	No

Table 12: Ferry Fare Impact Summary—Minority and Non-Minority for GGF Disparate Impact Analysis

% of Minority Riders in Overall Ridership	% of fare discount benefiting Minority Clipper transfer riders	%Non-Minority Riders in Overall Ridership	% of fare discount benefiting Non-Minority Riders	Difference between Minority Transfer Program Users and minority % of Ridership overall	Exceeds Disparate Impact Threshold?
25.39%	32.35%	74.61%	67.65%	6.96%	No

The positive impact of this fare proposal will be enjoyed to a greater extent by low-income riders than by non-low-income riders. While low-income riders make up 14.74% of ferry ridership, they will potentially receive 25.26% of the benefits of the Pilot Program in the form of transfer discounts. This is a differential of 10.52%, which exceeds the District's disproportionate burden threshold of 10% and means that the benefits for Low-Income riders are 10.52% higher than expected based on their representation among riders overall. Therefore, the proposal does not constitute a disproportionate burden on low-income riders.

Minority riders make up 25.39% of the ridership and are anticipated to receive 32.35% of the benefits of the Pilot Program, in the form of transfer discounts. This is a differential of 6.96%, meaning they receive 6.96% more of the benefits than expected when compared to their representation among riders overall, which is less than the District's disproportionate burden threshold of 10%. Therefore, this proposal does not constitute a disparate impact on minority riders.

3. Conclusion

GGT: As can be seen on Tables 5 and 6 on pages 12 and 13 of this report, the proposed Pilot Program will have a positive impact on low-income customers and will not disparately impact minority customers. This demonstrates that there is neither a disparate impact on minority GGT riders nor a disproportionate burden on low-income GGT riders resulting from the proposed program.

GGF: As shown on Tables 11 and 12, immediately above, the proposed Pilot Program will have a positive impact on both low-income and minority customers. This demonstrates that there is neither a disparate impact on minority GGF riders nor a disproportionate burden on low-income GGF riders resulting from the proposed program.