

Agenda Item No. (4)

To: Transportation Committee/Committee of the Whole

Meeting of July 25, 2019

From: Ron Downing, Director of Planning

Mona Babauta, Deputy General Manager, Bus Division

Denis J. Mulligan, General Manager

Subject: APPROVE ACTIONS RELATIVE TO GOLDEN GATE TRANSIT

COMMUTE ROUTES IN CENTRAL AND NORTHERN MARIN COUNTY, APPROVAL OF THE TITLE VI EQUITY ANALYSIS AND AUTHORIZE

FILING A NOTICE OF EXEMPTION UNDER CEQA

Recommendation

The Transportation Committee recommends that the Board of Directors approve actions relative to Golden Gate Transit commute routes in Central and Northern Marin County as follows:

- 1. <u>Sir Francis Drake Corridor</u>: add one evening trip on Route 24, modify Route 24X to provide non-stop service between the College of Marin and Golden Gate Bridge Toll Plaza and adjust service levels, and discontinue Route 27 between Sleepy Hollow and the San Anselmo Hub;
- 2. <u>Marinwood, Lucas Valley, and Novato</u>: discontinue Route 44, extend Route 38 from Terra Linda to Marinwood and add one afternoon trip, provide service to Lucas Valley on new Route 38A, adjust Route 54 service levels at bus pads in the San Rafael area, terminate Routes 54 and 54C in central Novato, replace Route 56 with Route 56X and increase service levels, and add an afternoon trip on Route 58;
- 3. Approve the attached Title VI equity analysis; and,
- 4. File a Notice of Exemption under the California Environmental Quality Act.

This matter will be presented to the Board at its July 26, 2019, meeting for appropriate action. If approved by the Board, the effective date of these changes would be Monday, December 9, 2019. Attached are the proposed schedules and maps associated with this recommendation.

Background

In April 2019, the Golden Gate Bridge, Highway and Transportation District's (District) Board of Directors (Board) approved the setting of a public hearing in June to gather public input on proposed changes to Golden Gate Transit commute routes in Central and Northern Marin County. The proposal included the following components:

- Sir Francis Drake Corridor:
 - Replace peak trips on Route 24 with new Route 24A, which would operate between the College of Marin and San Francisco Financial District with service every 20 minutes;
 - o Increase peak service on Route 24X to every 20 minutes, and operate service non-stop between the College of Marin and Golden Gate Bridge Toll Plaza; and,
 - o Discontinue Route 27 between Sleepy Hollow and the San Anselmo Hub.
- Marinwood, Lucas Valley, and Novato:
 - o Discontinue Route 44, which provides commute service from Lucas Valley and Marinwood to the San Francisco Financial District;
 - Extend Route 38 from Terra Linda to Marinwood, eliminating service along Del Ganado Road and providing replacement service in Marinwood but not Lucas Valley for current Route 44 customers;
 - O Discontinue Route 54 service at bus pads in the San Rafael area, which provide service outside of times currently served by Routes 44 and 58;
 - o Terminate Routes 54 and 54C in central Novato, eliminating service in San Marin that is duplicative of Route 56;
 - o Replace Route 56 with Route 56X and increase service levels to offer a similar service frequency and span as Route 54; and,
 - o Add an afternoon trip on Route 58 to match the service span as current Route 44 at bus pads in the San Rafael area.

These recommendations were made based on several factors, including:

- Declining ridership on Routes 44 and 58, neither of which meet the District's ridership standard of 20 passengers per trip on average;
- An imbalance of passenger loads on Routes 24 and 24X, especially in the afternoon when Route 24X carries many more passengers than Route 24 during overlapping hours of operation; and,
- The continued poor performance of the Sleepy Hollow portion of Route 27, which does not meet the District's ridership standard of 10 passengers per trip on average.

The District's *Rules of the Board* and Title VI Policies call for a public hearing to be held when discontinuation of a route is proposed. Therefore, the required public hearing was held on June 20, 2019, in the Board Room of the Toll Plaza Administration Building in San Francisco. The hearing was preceded by the appropriate outreach activities, including staff-led workshops in Marinwood, San Marin, and San Anselmo to gather direct feedback from Golden Gate Transit customers. Members of the public who could not attend the public hearing or outreach sessions were able to submit comments in writing, either electronically or through the mail.

Modifications to the Original Proposal

Through this public hearing process, the District received 197 individual comments from members of the public. Of these, 123 expressed opposition to the proposal, 17 were in favor of the proposal, and 57 were neither in support of or opposed to the proposal. Of the 57 comments that did not support or oppose the proposal, 47 expressed concerns about aspects of Golden Gate Transit service on the affected routes.

Based on extensive public feedback and requests, District staff reassessed the proposal to be responsive to the requests of bus riders while being conscious of the factors that influenced the proposal. As a result, the proposal has been revised as follows:

• Sir Francis Drake Corridor:

- O The concept to create Route 24A coupled with increased service levels on Route 24X is discarded, and instead one evening trip will be added on Route 24. Passengers expressed concern for more frequent service and a wider span of service, even if it results in a slightly longer travel time. Passengers specifically requested a greater span of service in order to meet family obligations.
- Trips on Routes 24 and 24X would be re-spaced, and the non-stop service area on Route 24X would be expanded as proposed, to better balance passenger loads between buses.
- Marinwood, Lucas Valley, and Novato:
 - O An afternoon trip would be added to Route 38, expanding service to five trips in each direction. Three of the five trips in each direction would continue to serve Del Ganado Road in Terra Linda. The other two trips per direction, which would be designated Route 38A, would extend to Lucas Valley to provide partial replacement service for Route 44.
 - O Route 54 service to the Marinwood, Lucas Valley, Terra Linda, and North San Pedro Road Bus Pads would not be eliminated. Instead northbound Route 54 service to these bus pads would be reduced. This would maintain the existing service span (earliest and latest trips) while speeding up the remaining trips to Novato, which can utilize the carpool lanes in this area.

The modified proposal would continue with the proposed discontinuation of Sleepy Hollow service on Route 27, modifications to the alignment of Routes 54 and 54C in Novato, and enhancements to Route 56X and 58.

Several comments requested another reprieve for Sleepy Hollow service. This segment of the Route 27 typically carries five passengers on the one morning trip, while the one evening trip typically has only one passenger, so continuation of the service is not justified. Instead, it is recommended that Marin Transit be approached to provide service in a manner that would better meet the needs of this community.

Comments on the proposed changes to Routes 54, 54C, and 56X were mostly positive, and no further changes to the proposal are warranted for these routes. All components of the revised proposal would be monitored for effectiveness once implemented.

Title VI Impacts

Federal Transit Administration regulations and guidance implementing Title VI of the Civil Rights Act of 1964 require an equity analysis be performed in the case of a major service change. The District's Title VI Policies define a major service change as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Since canceling Route 44 constitutes a major service change, staff conducted an equity analysis to determine whether canceling Route 44 would result in a disparate impact to minority populations or impose a disproportionate burden on low-income populations in the District's service area. None of the other parts of the proposal constitutes a major service change. The analysis examined demographic data from the District's bus service and on Route 44 itself.

Overall, the analysis concludes that the proposed elimination of Route 44 does not constitute a disproportionate burden on low-income riders or a disparate impact on minority riders. The complete Title VI equity analysis is set forth in Appendix A.

CEQA Findings

It is recommended that the Board authorize staff to file a Notice of Exemption under the California Environmental Quality Act (CEQA) for the discontinuance of Route 44. Alternate service will be offered by other Golden Gate Transit bus routes and Route 44 ridership is low, so it is anticipated that there will be little or no impact on traffic along the U.S. 101 Golden Gate Corridor. While some passengers might choose to drive, it is expected that the diversion of current riders to driving would be minimal. Accordingly, there is no possibility that the discontinuance of Route 44 will have a significant effect on the environment. 14 Cal. Code Regs. § 15601(b)(3). Thus, the discontinuance of Route 44 is exempt from CEQA. If approved by the Board, staff will file a Notice of Exemption for the discontinuance of Route 44 with the City and County of San Francisco and County of Marin.

Public Notification

Outreach on the proposal occurred during the months of April, May, and June 2019. Public notification activities included:

- Three public workshops were held: in Marinwood on May 8, in Novato on May 11, and in San Anselmo on May 18.
- A Notice of Public Hearing was posted to the District's website on May 30.
- Legal notices were published in the *San Francisco Examiner* on Sunday, May 26, and Sunday, June 9; in the *Marin Independent Journal* and *San Francisco Chronicle* on Tuesday, May 28, and Tuesday, June 11; and, in the *Pacific Sun* on Wednesday, May 29, and Wednesday, June 12.
- Advertisements were placed in local publications for April and May (*Marin Independent Journal*, *Pacific Sun*, and *La Voz*).

- Posters on board buses advertising the public meetings were posted for the weeks of April 29, May 6, May 13, and May 28.
- Direct outreach to passengers was done on Routes 24, 24X, 27 (Sleepy Hollow segment only), 38, 44, 54, 56, and 58.
- Web News item and Press Release to local media posted on May 1.
- Social media postings on Facebook and Twitter May 2, May 7-9, May 11, May 15-16, May 18, May 21, June 10, and June 18.
- Email blast to customers and community-based organizations sent on May 1, May 7, May 15, and June 18.
- A public discussion held as part of the regularly scheduled Bus Passengers Advisory Committee (BPAC) meeting on Wednesday, May 15, at 6:00 p.m.
- A public hearing held in the Board Room, Golden Gate Bridge Toll Plaza, on Thursday, June 20, at 9:00 a.m.

Translation of all printed materials and handouts in Spanish were available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal could have been be submitted in several different ways:

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

All comments were considered without regard to the manner in which the comments were submitted. Therefore, individuals did not have to attend the public hearing and provide testimony in person if they had commented through e-mail or written forms. All comments received through the above methods were considered in the final recommendation. Comments were accepted through 4:30 p.m. on Friday, June 21, 2019. The public hearing was held on June 20, 2019, at 9:00 a.m. in the Board Room, Administration Building at the Golden Gate Bridge Toll Plaza, San Francisco, CA.

A total of 197 comments were received, including a letter from the Bus Passengers Advisory Committee. A summary of the comments and staff responses is contained in Appendix B.

Fiscal Impact

The total annualized additional cost to implement this proposal is approximately \$333,000. That amount would be fully offset primarily by utilizing resources currently dedicated to Route 31, which will be discontinued due to the opening of SMART's Larkspur extension in December 2019, and by redeploying two trips from other commute routes that are underperforming to this service package. Therefore, there will no budgetary impact to implement this proposal.

Attachments: Appendix A – Title VI Equity Analysis

Appendix B – Staff Responses to Public Comments

Appendix C – Proposed Schedules

Appendix D – Maps of Existing Conditions and Proposed Service Changes



Appendix A Title VI Equity Analysis: Cancel Route 44 and Replace with Extended Routes 38 and 58 Service

Presented to the Golden Gate Bridge, Highway and Transportation District Transportation Committee July 25, 2019

I. Introduction

Staff is currently proposing to eliminate Golden Gate Transit (GGT) Route 44, which provides commuter service from Lucas Valley and Marinwood to the San Francisco Financial District, due to low ridership. As cancellation of the Route 44 would constitute a major service change, before taking any action, the Board of Directors (Board) must first consider whether it would disparately impact minority populations and/or disproportionately burden low-income populations in the District's service area as described in to FTA Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients"), implementing Title VI of the Civil Rights Act of 1964, and the District's Title VI Policies.

This equity analysis indicates that the proposed cancellation of Route 44 will not have disparate adverse impacts on minority riders or disproportionately burden low-income riders because the proportion of minority and low-income riders on Route 44 is lower than in the ridership of GGT as a whole.

Staff is also proposing changes on Routes 24, 24X, 38, 54, 54C, 56, and 58 at the same time, but none of these changes amounts to 25% of the revenue miles on any of the routes, so no equity analysis of these changes is required.

II. Title VI Policies

The Golden Gate Bridget, Highway & Transportation District (District) adopted its Major Service Change, Disparate Impact and Disproportionate Burden Policies (together referred to as "Title VI Policies") on August 9, 2013. These policies set forth the standards used in service equity analyses. The District's Major Service Change Policy reads in relevant part:

• A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

The following are exemptions to the policy:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered "major" unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered "major," as long as the service will be/has been operated for no more than twelve months.

• If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered "major."

The District's Disparate Impact policy provides:

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

The District's Disproportionate Burden Policy provides:

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

Public Outreach

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

Comments Received

Of the comments received by the District, one alerted the District to the need to apply Title VI principles to the allocation of resources between bus and ferry services; one commented on the inconvenience of the time and location of the public hearing, service reliability, and driver

attitudes; and another urged the District to reach out to community partners and agencies to get the word out about Title VI-related public hearings.

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

III. Golden Gate Transit Bus Services

GGT Bus Services are generally delineated as "Commute" and "Basic." Generally, "Commute" bus service is weekday, peak-period, one-directional service between Sonoma or Marin County to/from San Francisco, plus shuttle-type routes designed specifically to take passengers from their places of origin to/from the primary Commute routes. "Basic" 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:

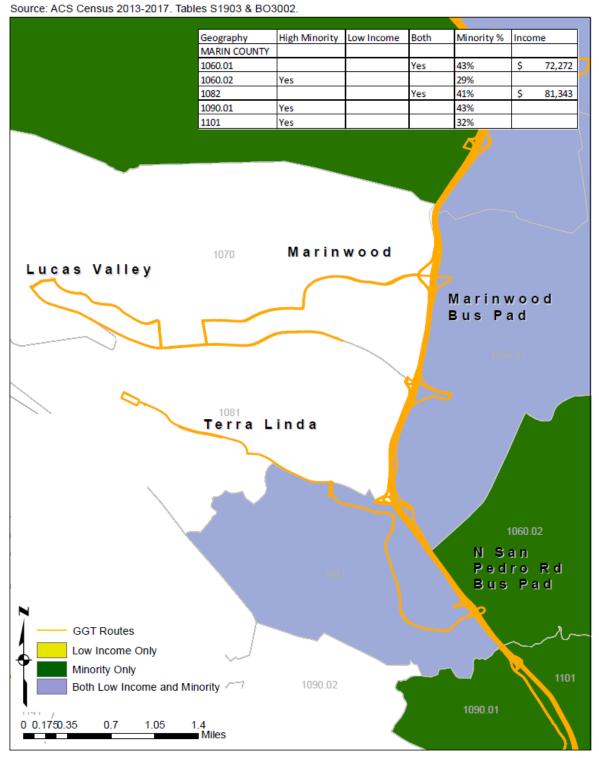
- *Transbay Commute Service* provides commute service during morning and afternoon peakhour periods. Commute routes operate Monday through Friday, except designated holidays, and serve San Francisco, Marin, and Sonoma counties. Commute routes include Routes 2, 4, 4C, 8, 18, 24, 24C, 24X, 27, 38, 44, 54, 54C, 56, 58, 72, 72X, 74, 76, 92, and 101X. If the proposed service changes are approved, then Route 44 will be eliminated, Route 24A will be added, and Route 56X will replace Route 56.
- *Transbay Basic Service* provides daily service throughout the day and evening between San Francisco, Marin, Sonoma, and Contra Costa counties. Basic routes include Routes 30, 40, 40X, 70, and 101. Route 101 receives moderate funding from the MTC's Regional Express Bus (REB) program.

IV. Route 44 Cancellation, Purpose and Public Outreach

At the inception of Golden Gate Transit commute service, service from Lucas Valley and Marinwood was provided during one hour in the morning and evening peaks on Route 40. The service expanded slightly in 1981 with rising ridership. This level of service continued through July 1992, when the route number was changed to 44 to accommodate the new basic service Route 40 over the Richmond-San Rafael Bridge. Service was extended to earlier in the morning in June 1993 then was cut back again in March 1995. At that time there were five morning trips and four evening trips. Morning service was reduced by one trip again in June 2007 due to decreasing ridership. Then, in Fall 2010, after staff proposed canceling the entire route, residents and riders protested, and service was reduced to two morning and two evening trips. Ridership held steady or even improved from 2010 through early 2018 at around 2,000 patrons monthly, but then began dropping again in June 2018 and is currently between 1,000 and 1,500 patrons per month.

The current proposal would eliminate Route 44 entirely. Resources used by Route 44 can be deployed more effectively to services with higher demand.

Map 1
ROUTE 38 & 44 GGT SERVICE AREA



Public Notification and Comment

Outreach on the proposal occurred during the months of April and May 2019. Public notification activities included:

- A public workshop was held at the Marinwood Community Center on May 8.
- A Notice of Public Hearing was posted to the District's website on May 30, 2019.
- Legal notices were published in the San Francisco Examiner on Sunday, May 26, and Sunday, June 9; in the Marin Independent Journal and San Francisco Chronicle on Tuesday, May 28, and Tuesday, June 11; and, in the Pacific Sun on Wednesday, May 29, and Wednesday, June 12.
- Advertisements were placed in local publications (Marin Independent Journal, Pacific Sun and La Voz).
- Posters were displayed on board buses advertising the public meetings.
- Seat drops were done on all Routes 44 trips.
- Press release was sent to local media and an article was written and ran in the Marin Independent Journal.
- Social media postings on Facebook and Twitter.
- Email blast to customers and community-based organizations.
- Information was posted and featured on the District's website.
- Translation of all printed materials and handouts in Spanish were available, per the District's Limited English Proficiency (LEP) plan.
- Translation of all printed materials and handouts in Spanish was available, per the District's Limited English Proficiency (LEP) Plan.

Public Comment Process

Public comments on this proposal could be submitted in several different ways:

- 1. In person at a public meeting or hearing;
- 2. By e-mail to <u>publichearing@goldengate.org</u>; and/or,
- 3. In writing 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 need not attend the public hearing and provide testimony in person if they have commented through e-mail or written forms. All comments received through the above methods were considered in the final recommendation. Comments were accepted through 4:30 p.m. on June 21, 2019.

Through the public comment and public hearing process, the District received 197 individual comments from members of the public, many of which were in opposition to the proposal. 17 of these comments requested the District keep Route 44 service in Lucas Valley.

V. Title VI Equity Analysis for the elimination of Route 44

The elimination of Route 44 is considered a Major Service Change based on the District's Major Service Change Policy because it is a reduction in service of more than 25% on Route 44. Because of this, an Equity Analysis is required to determine whether this change will result in a disparate impact to minority populations or a disproportionate burden on low income populations, based on the District's Title VI Policies.

The current proposal also includes changes to Routes 24, 24X, 38, 54, 54C, 56, and 58. In particular, changes to Route 38 and 58 will mitigate the impacts of the Route 44 cancellation. Lucas Valley and Marinwood riders would be offered continued service on the Route 38, which will be extended north via Lucas Valley Road to Miller Creek Road in Marinwood and on the Route 58, which will provide expanded service to the bus pads at Marinwood, Lucas Valley, Terra Linda, and North San Pedro Road. In addition, in response to public comment, some bus pad service on Route 54 will be retained. The cancellation is proposed to be effective December 9, 2019. No other component of the current proposal constitutes a Major Service Change, as none of these changes amounts to 25% of the revenue miles on any of the routes.

When the changes to Routes 44, 38 and 58 are viewed together, current riders will have the same frequency of service as previously, but some will have to walk to a more distant stop to access service. Lucas Valley residents who ride will have a longer ride, of approximately ten additional minutes.

A. Equity Analysis Methodology

The FTA Circular states that for elimination of a route, the appropriate comparison population is the ridership of the affected route as compared to the ridership of the system as a whole. For purposes of analyzing the equity implications of eliminating Route 44, Staff compared ridership on Route 44 to ridership on all GGT bus routes. All data was derived from the District's 2018 system-wide passenger survey.

For the purpose of the disproportionate burden analysis, Staff determined riders with a household income of less than \$75,000 per year to be low income. While the FTA Circular defines low income with reference to the federal poverty guidelines, federal poverty standards are underinclusive for an area where the cost of living is so much higher than most localities. To compare, in 2015, the California State Income Limits that are used to determine eligibility for low-cost housing and other programs gave a range of \$65,700 for a single-person household to \$123,000 for an 8-person household for the "low income" designation for Marin County (there are also "very low income" and "extremely low income" categories). Marin County, where Route 44 riders reside, has a comparatively high median income (\$97,815, from the 2012-2016 American Community Survey). In order to reflect the high cost of living in the San Francisco Bay Area, District Staff used 90% of the median income for the service area (\$88,034) to derive a low-income cut-off. Since data from the District's most recent passenger survey was collected in fixed groupings, and \$75,000 is the closest grouping to \$88,034, this analysis uses household incomes of \$75,000 or less as the definition of low-income.

For the disparate impact analysis, a "minority" rider is any rider who identifies themselves as any race or ethnicity other than white, non-Hispanic.

1. Data: 2018 District System-wide Survey

In 2018, the District participated in the Metropolitan Transportation Commission's (MTC) region-wide passenger survey. The consultant selected by MTC and by District Staff surveyed all of the District's services, including GGT and Golden Gate Ferry (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. Presented below are the results in 2018 to questions regarding income and race for riders of all bus routes and for Route 44 riders specifically.

Table 1: Household Income

	Route 44 (%)	Golden Gate
Household Income		Transit (%)
Below \$10,000	0	3
\$10,000 - \$24,999	0	5
\$25,000 - \$34,999	0	7
\$35,000 - \$49,999	14	13
\$50,000 - \$74,999	12	24
\$75,000 - \$99,999	9	13
\$100,000 - \$149,999	11	12
\$150,000 or more	39	8
REFUSED	14	15
Skip - Paper Survey	0	<1

Using the cut-off of \$75,000 to define "low-income," 52% of all bus riders reported being low-income, where 26% of Route 44 riders reported being low-income.

Table 2: Race/Ethnicity

	Route 44 (%)	Golden Gate
Race/Ethnicity		Transit (%)
White alone, non-Hispanic	65	58
Asian alone, non-Hispanic	19	8
African-American alone, non-Hispanic	9	10
Latino/Hispanic, any race	6	16
Mixed race, non-Hispanic	0	4
Native Hawaiian or Pacific Islander alone, non-Hispanic	0	<1
No race provided	0	<1
American Indian or Alaskan Native alone, non-Hispanic	0	<1
Other, non-Hispanic	0	<1

42% of all bus riders responding to the question reported identifying with a race and ethnicity other than "White Non-Hispanic," where 35% of Route 44 riders responding to the question reported the same.

B. Equity Analysis Findings

The proposed elimination of Route 44 does not constitute a disproportionate burden on low-income riders or a disparate impact on minority riders.

No Disproportionate Burden

As shown in Table 3 below, whereas 52% of all GGT bus riders are low-income, 26% of Route 44 riders are low-income. Riders who did not report their income were excluded from this analysis for lack of data. Accordingly, the low-income ridership of the Route 44 passengers is proportionally less than the low-income ridership of the system as a whole by 26%. Therefore, we conclude that the cancellation of Route 44 would not have a disproportionate burden on low income riders, and would burden non-low-income riders relatively more than low-income riders.

Table 3. Low-Income and Non-Low Income Ridership

	Golden Gate Transit Ridership	Route 44 Ridership	Difference
Non-Low-Income	33%	59%	26%
Low-Income (less than \$75,000)	52%	26%	-26%

No Disparate Impact

As shown in Table 4 below, 42% of passengers on GGT bus service overall are minority. On Route 44, only 35% of passengers identify as minority. Thus, elimination of Route 44 will affect riders with a 7% lower proportion of minorities than riders on Golden Gate buses as a whole. Therefore, we concluded that the cancellation of Route 44 would not have a disparate impact on minority riders, and would burden non-minority riders relatively more than minority riders.

Table 4. Minority and Non-Minority Ridership

	Golden Gate Bus Ridership	Route 44 Ridership	Difference
Non-Minority	58%	65%	7%
Minority	42%	35%	-7%

C. Conclusion

The elimination of Route 44 will cause neither a disparate impact on minority riders nor a disproportionate burden on low-income riders under the District's Title VI Policies.

Attachment: Exhibit A-Resolution Adopting of Title VI Policies

EXHIBIT A

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2013-078

APPROVE ADOPTION OF POLICIES FOR GOLDEN GATE TRANSIT AND GOLDEN GATE FERRY SERVICE AND FARE CHANGES, UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED

August 9, 2013

WHEREAS, the Board of Directors (Board) of the Golden Gate Bridge, Highway and Transportation District (District) operates Golden Gate Transit (GGT) bus service and Golden Gate Ferry (GGF) service, both of which are public transportation services that occasionally receive federal funding to maintain or improve service scope and quality; and,

WHEREAS, on November 15, 2012, staff presented the Transportation Committee (Committee) with an overview of Title VI as applied to federal funding recipients, such as the District, subject to the new Circular Order issued by the Federal Transit Administration (FTA); and,

WHEREAS, on February 22, 2013, the Board approved the first action required by the new FTA Circular by adopting the required service standards and policies; and,

WHEREAS, to further comply with the new FTA Circular, the District must establish the following three policies: a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy (Three Policies); and,

WHEREAS, the Three Policies will guide when and how the District analyzes the effects of potential future fare and service changes on minority and low-income populations and, in the event the District finds disparities, the District must evaluate whether there is an alternative that has a more equitable impact; and,

WHEREAS, the new FTA Circular requires transit providers, such as the District, to solicit and consider public input before establishing such policies; and,

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

WHEREAS, staff presented the Three Policies to the Committee on June 13, 2013, and the Committee recommended and the Board, by Resolution No. 2013-054 at its meeting of June 14, 2013, authorized the setting of a public hearing on a proposal to establish policies for Golden Gate Transit and Golden Gate Ferry Service and for fare changes under Title IV of the Civil Rights Act of 1964 as amended; and,

WHEREAS, the District conducted outreach relative to this proposal, as follows: (1) a press release was issued on July 17, 2013; (2) information was posted on the District's website, emailed to District's opt-in subscription lists and community-based organizations, posted on District's social media sites, and published as advertisements and legal notices in several periodicals including *San Francisco Chronicle*, *Marin Independent Journal* and the *Santa Rosa Press Democrat*; (3) Public Outreach Meetings were held on July 8, 2013 in Marin City, on July 9, 2013 in Novato, and on July 10, 2013 in Rohnert Park; and, (4) Spanish translations of printed materials, website information, and community meetings were available at all public outreach meetings and at the public hearing; and,

WHEREAS, public comments on the Three Policies could be submitted by either attending the public hearing or the public outreach meetings, emailing publichearing@goldengate.org or sending written comments to the District; and,

WHEREAS, due to concerns about Marin City residents not having received sufficient advance notice of the opportunity to comment on the Three Policies, the District extended the comment period by two weeks and held an additional public outreach meeting at the Marin City Library on July 25, 2013; and,

WHEREAS, seven public comments were received by the District as of July 25, 2013, and while several comments were related to the overall topic of Title VI, none of the comments were specific to the Three Policies; and,

WHEREAS, complete copies of the Three Policies and staff's underlying analysis, as well as a summary of the comments received and staff responses, are included herein as Attachments; and,

WHEREAS, the Transportation Committee at its meeting of August 2, 2013, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves adoption of policies for Golden Gate Transit and Golden Gate Ferry Service and fare changes, under Title VI of the Civil Rights Act of 1964, as amended, and attached hereto.

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

ADOPTED this 9th day of August 2013, by the following vote of the Board of Directors:

AYES (15):

Directors Arnold, Belforte, Breed, Cochran, Fredericks, Moylan, Pahre, Rabbitt,

Reilly, Sears, Snyder, Sobel and Theriault; Second Vice President

Stroeh; President Eddie

NOES (0):

None ABSENT (4): Directors Campos, Wiener and Yee; First Vice President Grosboll

James C. Eddie

President, Board of Directors

Janet S. Tarantino

Secretary of the District

Attachment 1 - Three Policies and Analysis

Attachment 2 - Summary of Comments Received and Staff Responses

ATTACHMENT 1

Proposed Title VI Policies Pertaining to Major Service Changes, Disparate Impacts, and Disproportionate Burdens

Major Service Change Policy

The District must ensure that its services are provided equitably, without discrimination based on race, color, national origin or socio-economic status. To that end, the District must evaluate potential "major" service changes and all fare changes (except for those specifically exempt in the FTA Title VI Circular, such as Spare-the-Air Days and short-term promotional service demonstrations or fare decreases) for their impact on low-income and minority populations in its service area. Before this can occur, the District must adopt a Major Service Change policy to provide a concrete basis for determining which service changes need to be analyzed for equity.

Staff proposes the following for the District's Major Service Change Policy:

• A major service change is defined as a reduction or increase of 25 percent (25%) or more in total vehicle revenue miles in service on any specific route, with the change(s) occurring at one time or over any twenty-four month period.

Staff further proposes the following exemptions such that these changes would not be subject to a Title VI Equity Analysis:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered "major" unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (such as promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities) is not considered "major," as long as the service will be/has been operated for no more than twelve months.
- If District-operated transit service is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops served, the change is not considered "major."

The following examples will assist the public in understanding the impact of the proposed policy.

- Example 1: If Route 11 has 20 trips a day, and the District proposes to cancel six of those trips (30%) in January 2014, then that is a major service change, and a Title VI Equity Analysis must be completed. However, if only four trips are proposed for cancellation (20%), then no analysis is required. If the District cancels these four trips and then decides to cancel two more trips in January 2015 on this same Route 11, then the percentage will again be 30% over a twenty-four month period, and an analysis will be required.
- Example 2: If Route 12 has eight trips per day and four trips are proposed for cancellation, then under the proposed policy, a Title VI Analysis is not required because the route has fewer than ten total trips per day. However, if the entire route is proposed for cancellation, then an analysis is required.
- <u>Example 3</u>: If Route 13 is introduced in January 1, 2014 as a demonstration service, and the District proposes to discontinue it effective December 31, 2015, then no analysis

- is required when the service is introduced or discontinued. However, if the District proposes to continue the service beyond January 1, 2015, then an analysis is required for it to continue, and for it to be discontinued thereafter.
- Example 4: If Route 14 operated four times a day from Corte Madera to Petaluma, and the District planned to cease operating this trip while another transit system planned to operate the same route four times a day at the same times, with the same or better fares and transfer options, then no analysis would be required.

Disparate Impact and Disproportionate Burden Policies

When a fare change or major service change is proposed, the District must analyze whether the change will result in a fair distribution of both negative effects (such as service cuts or fare increases) and positive effects (service expansions or fare reductions, such as new discounts).

In the case of the Disparate Impact Policy, the analysis focuses on whether minority riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-minority riders or residents.

Similarly, in the case of the Disproportionate Burden Policy, the analysis focuses on whether low-income riders or residents bear a disproportionately greater burden – or receive a disproportionately lesser benefit – than non-low-income riders or residents.

Disparate Impact Policy

In conducting equity analyses, the Disparate Impact policy provides the threshold used to determine whether greater negative impacts – or lesser positive impacts – on **minority** riders and residents are significant.

If a proposed action would have a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or a benefit that would be available to non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. If no option with a less disparate effect exists, the District must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished.

Staff proposes the following for the District's Disparate Impact Policy:

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

The question that must be answered for every major service change and every fare change is: are minority riders more negatively affected (or less positively affected) by this change than riders as a whole? This is determined primarily by calculating the percentage of minority riders on

Golden Gate buses (or ferries, for a ferry service or fare change) and by calculating the percentage of minority riders affected by the change. If minorities represent a higher percentage in the impacted group than in the general ridership as a whole, the question is, how much higher? If the difference is ten percent or higher, then there is a disparate impact. As a secondary aspect of, and important precursor to, this comparative analysis, the District must define the adverse effects and/or benefits being measured for the change in question.

Some hypothetical examples of how the policy could be applied follow:

- Example 1: The District proposes to discontinue Route 16. Fifty percent of Route 16's riders belong to a minority group. If ridership on the District's bus service as a whole is 35% minority, the difference in the percentage of affected riders who are minorities and the percentage of all bus riders who are minorities is 15 percentage points. That indicates that there is a disparate impact on minority riders, and in this situation, the District would be required to evaluate whether there is an alternative with a less disparate impact on minority riders. If there is no other alternative, the District would need to mitigate the negative impact of the service cancellation on minority riders and demonstrate that the service reduction serves a legitimate business purpose that cannot be accomplished with less impact on minority riders.
- Example 2: The District proposes to raise fares from Zone 4 to Zone 1 by 10% and the rest of the fares only 5%. Whereas the overall ridership is 35% minority, if Zone 4 to Zone 1 riders is, for example, 46% minority, then the difference between the two groups is 11 percentage points, exceeding the 10% threshold, and there would be a disparate impact. The District would have to seek alternatives with a more equitable impact. If no such alternatives are available, then the District would have to mitigate the impact on minority riders and demonstrate that this fare increase serves a legitimate business purpose that cannot be accomplished in another less-discriminatory way.

Disproportionate Burden Policy

As with the Disparate Impact Policy, the Disproportionate Burden Policy comes into play when a fare change or major service change is analyzed for its equity. In this case, staff determines whether **low-income** riders and residents bear a disproportionate burden of the negative effects of – or enjoy a disproportionately low benefit from – the proposed change.

The proposed Disproportionate Burden Policy is very similar to the proposed Disparate Impact Policy and reads as follow:

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

If, in the course of performing a Title VI Equity Analysis, the District finds that a proposed fare or major service change has a negative impact that affects low-income riders as compared to

non-low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income riders more than low-income riders with a disparity that exceeds the adopted Disproportionate Burden Threshold, the District must evaluate whether there is an alternative that has a more equitable impact. Otherwise, the District must take measures to mitigate the impact of the proposed action on the affected low-income population.

Again, illustrative examples can make the uses of the policy more transparent:

- Example 1: The District proposes to discontinue Route 16. The ridership of Route 16 is 66% low-income. If ridership on the District's bus service as a whole is 50% low-income, then the difference between the low-income ridership of the Route 16 and the overall bus ridership is 16 percentage points, which means this change exceeds the threshold for disproportionate burden, or in other words, that low-income riders are bearing a disproportionate burden of this service change. In this situation, the District would be required to take measures to mitigate or lessen the impact of this change on the low-income riders of Route 16.
- Example 2: The District proposes to cut four trips on Route 21. The ridership of Route 21 is 45% low-income. If the ridership on the District's bus service as a whole is 50% low-income, then the difference is negative five percentage points (meaning the affected ridership is five percent less low-income than the overall ridership), and the burden of this change does not fall more on low-income riders than on riders as a whole.
- Example 3: The District proposes to add a new route. The residents of the areas served are 25% low-income. If the District's ridership as a whole is 50% low-income, those benefiting from the service addition are 25% less low-income than the overall ridership. There is a disproportionate benefit, and the District would be required to consider options for mitigating this disproportion.

ATTACHMENT 2

Summary of Comments Received and Staff Responses

1. **Comment:** Special fares for minorities?? Racism of the worst order.

<u>Staff response:</u> The public comment process is not about setting special fares for minorities but instead setting a framework for evaluating the impacts of future service or fare changes on disadvantaged communities.

2. <u>Comment:</u> I have been advocating for Title VI populations in Marin City. In order to get proper notification to minority and low-income populations adequate communication must be provided as an outreach mechanism to ensure against a community not being left out. Inasmuch as this did not happen in Marin City, where both low-income and minority residents were left out with no notification of an Open House on July 8 at the Senior Center, there is a violation of Title VI. I noticed an 8 1/2 by 11 inches poster (only one hour before the meeting) at the Marin City Hub. This was another disappointment to me and others in our community. Our shuttle service is inadequate for serving our community because of the hilly terrain.

<u>Staff response:</u> Given concern about the adequacy of the notification process for Marin City residents, the public comment period was extended by two weeks, additional communications were sent out, notices were posted at all bus stops in that community, and leaflets were handed out to bus riders advising that an additional public outreach meeting was scheduled in Marin City. The proposed policies are specific to regional bus and ferry services operated by the Golden Gate Bridge Highway and Transportation District. Shuttle and other fixed route and demand responsive service operated by Marin Transit and policies related to those services are the responsibility of Marin Transit.

3. **Comment:** I'm glad that you're having an additional comment period for Marin City, but in the future it's important that more advertising and outreach is implemented. Many residents were unaware about the meeting and the comment period.

Staff response: See response to Comment #2. Future outreach efforts in Marin City will include more extensive communication efforts.

4. <u>Comment:</u> It appears the proposals brought to the hearing are all about raising fares and arguing about whether or not the District can raise some and not others without discrimination. The point should be THERE SHOULD BE NO FARE INCREASES, BUT FARE DECREASES.

Staff response: The proposed policies provide a framework to evaluate future potential service and fare changes. No fare changes are proposed at this time.

5. <u>Comment:</u> The District's Allocation of resources between bus and ferry services needs to be re-evaluated in view of Title VI. There is a disproportionate amount of resources going to wealthy ferry riders and not to low-income bus riders.

Response: Duly noted. The proposed policies do not address specific to the District's allocation of transit resources between modes. The District plans to analyze the demographic characteristics of its ferry and regional bus riderships.

6. <u>Comment:</u> The job of the Golden Gate Transit District is to provide public transportation, in order to reduce automobile traffic and provide a reasonable-cost alternative to driving. The job of the District is transportation, NOT social justice, affirmative action or welfare. All this would do is raise the cost of transportation due to the additional resources needed to determine, implement and monitor these Title VI items. It is ridiculous to put the Transit District into this situation. The \$5,000 to conduct this initial public hearing will be pocket change to the cost of implementation. The bottom line is stick to your primary objective and tell the feds to make their own determinations that the Transit District is discriminatory, and make them prove it. Focus on serving the communities you service, while keeping costs down, and not on Washington D.C's social justice schemes.

Response: The proposed policies and overall compliance with Title VI is a condition of the District continuing to receive federal financial assistance for its public transportation programs.

7. **Comment:** I oppose any fare increases for the Golden Gate transit ferries, buses and bridge. The fares are exorbitant as they are now and are a huge burden on the average person's finances. This is supposed to be PUBLIC transportation, not ELITE transportation. It is only affordable to the rich.

Response: The proposed policies are not specific to any fare increase at this time. They will be used to evaluate future fare increase proposals.



Appendix B Staff Responses to Public Comments

Summary

At the close of the public comment period on June 21, 2019, there were 197 unique comments received by the District. Of these 197 comments, 123 (62%) expressed opposition to the proposal (Proposal), 17 (9%) were in favor of the Proposal, and 57 (29%) did not support or oppose the Proposal.

Comments on the Proposal

Comments Made in Support of the Proposal

The District received 17 comments in support of the Proposal. Seven (7) comments were in favor of changes to Route 24; one (1) comment was in favor of eliminating the Sleepy Hollow portion of Route 27; one (1) comment was in favor of the change to Route 38; four (4) comments were in favor of the change to Route 54; and four (4) comments were in favor of the change to Route 56. This tally includes correspondence from the District's Bus Passengers Advisory Committee (BPAC) in support of Routes 24 and 24X serving bus stops on Sir Francis Drake Blvd. rather than the San Anselmo Hub.

Comments Neither Opposed nor in Favor

The District received 57 comments neither in support of nor in opposition to the Proposal. Of these, 47 comments expressed concerns about aspects of Golden Gate Transit service on the affected routes. The remaining 10 comments were unrelated to the proposal or requested additional information.

Comments Made in Opposition to the Proposal

The District received 123 comments in opposition to the Proposal.

Of the 47 comments of concern and 123 comments in opposition to the proposal, several specific themes were mentioned. The themes of these 170 unique comments are addressed below. General comments made on the Proposal are also addressed.

• Comment: Route 38 – Keep Service Along Del Ganado Road in Terra Linda (21) Twenty-one (21) comments were opposed to the cancellation of Route 38 service

Twenty-one (21) comments were opposed to the cancellation of Route 38 service along Del Ganado Road in Terra Linda. Several comments suggested that some existing trips could be kept as a compromise. The revised proposal would maintain Route 38 service with three (3) trips in the morning and three (3) trips in the evening. There are currently five (5) trips in the morning and four (4) trips in the evening. There would be no reduction to the existing span of service; several comments indicated the need to use Route 38 at certain times of day so they can drop off their children at school.

• Comment: Route 44 – Keep Service in Lucas Valley (17)

Seventeen (17) comments were opposed to the cancellation of Route 44 service in Lucas Valley. A few comments suggested that one trip each direction could be maintained as a compromise, but commenters were not in agreement about a single time that would work. The revised proposal would extend two (2) trips in each direction on Route 38 from Marinwood to Lucas Valley. These trips would be designated Route 38A. Schedules for Route 38A would be designed to approximately meet work start and end times in San Francisco that are currently served by Route 44.

• Comment: Route 27 – Keep Service in Sleepy Hollow (17)

Seventeen (17) comments were opposed to the cancellation of Route 27 service in Sleepy Hollow. Many comments did not indicate that they actually ride the service, several comments were a form response, and the number of comments received exceeds the average daily ridership of this service. The District proposed cancellation of this service in 2016, but service was maintained at the public's request. However, there has been no material change in ridership levels, which average six (6) per day, since then. The revised proposal still calls for the cancellation of this service.

• Comment: Various Routes – Provide Adequate/Improved Capacity/Trip Times (17)

Seventeen (17) comments expressed concern about the available seating capacity and trip times of the proposed schedules on Routes 24, 38, 54, and 56. Several comments suggested that additional trips could be necessary. The revised proposal reflects these concerns through the provision of additional service on Routes 24 and 38 beyond what the Proposal included. Proposed service levels on Routes 54 and 56 are sufficient to meet ridership demand. The District reviews ridership on an ongoing basis and can adjust bus assignments and trip times as necessary to ensure that available seating capacity meets demand on all routes affected by the revised proposal.

• Comment: Route 54 – Keep Service at San Rafael/Marinwood Bus Pads (16)

Sixteen (16) comments were opposed to the cancellation of Route 54 service at the Marinwood, Lucas Valley, Terra Linda, and North San Pedro Road Bus Pads. The revised proposal would maintain service on three (3) morning, two (2) afternoon, and two (2) evening trips at these bus pads, resulting in no degradation to the existing span of service.

• *Comment: Route 44 – Keep Route 44 (15)*

Fifteen (15) comments were opposed to the cancellation of Route 44 in general but did not indicate areas of concern. The revised proposal would maintain service on all existing segments of Route 44: service in Lucas Valley would be provided by Route 38A; service in Marinwood would be provided by Routes 38 and 38A; and service at freeway bus pads would be provided by Route 58.

• Comment: Various Routes – Keep Service at Particular Stop/Time (14)

Fourteen (14) comments expressed concern about the availability of service at particular bus stops at particular times on Routes 24, 38, 54, and 56 to meet individuals' family schedules. In all cases, both the Proposal and the revised proposal would maintain service at the bus stops and times in question.

• Comment: Route 24 – More Service Is Needed West of College of Marin (13)

Thirteen (13) comments were opposed to the proposed service levels of Route 24X, which would be the primary Commute route serving Fairfax and San Anselmo. Many commenters suggested that increased service levels could come on Route 24 or 24X, as they preferred frequency of service to faster service if forced to choose. The revised proposal would substantially increase service levels compared to the Proposal, with an overall increase of one (1) trip compared to existing service levels. Most of this service would be provided by Route 24; only four (4) trips total would operate as Route 24X.

• Comment: Route 44 – Keep Service in Marinwood (8)

Eight (8) comments were opposed to the cancellation of Route 44 service in Marinwood. However, the Proposal would more than double service levels in Marinwood on Route 38. The revised proposal would still provide more than double the existing service levels of Route 44 through a combination of service on Routes 38 and 38A.

• Comment: Route 27 – Provide Local Service in Sleepy Hollow (7)

Seven (7) comments expressed concern about the cancellation of Route 27 service in Sleepy Hollow and suggested that local service be provided. The revised proposal still calls for the cancellation of this commute service. Marin Transit provides local service in Marin County and may be able to provide service to Sleepy Hollow that better meets the needs of the community than Golden Gate Transit Route 27. District staff have shared this feedback with Marin Transit staff for their consideration.

• Comment: Route 24 – Keep Service to Fisherman's Wharf/Levi's Plaza (5)

Five (5) comments were opposed to the loss of direct service from Fairfax and San Anselmo to the Fisherman's Wharf and Levi's Plaza areas as a result of the replacement of Route 24 with Route 24X during peak periods. The revised proposal would maintain Route 24 and increase its service levels rather than expanding Route 24X, so direct service between these origins and destinations would be increased rather than decreased.

• Comment: Various Routes – Keep Service for Others (4)

Four (4) comments expressed concern about changes to Routes 27, 44, and 54 and suggested that service be maintained to provide service for affected passengers despite not being affected themselves. The revised proposal would maintain service for most affected passengers.

• Comment: Route 24 – Do Not Implement Route 24A or Expand Route 24X (3)

Three (3) comments expressed general opposition to the creation of Route 24A or the expansion of Route 24X. The revised proposal would increase service on Route 24 rather than create Route 24A or expand Route 24X.

• Comment: Route 24 – General Opposition (3)

Three (3) comments expressed general opposition to the proposed changes to Routes 24, 24A, and 24X. Based on detailed feedback received by other commenters, the revised proposal would increase service on Route 24, not create Route 24A, and keep limited service on Route 24X.

• Comment: General Opposition to Proposal (3)

Three (3) comments expressed general opposition to the proposal but did not reference specific issues. Based on detailed feedback received by other commenters, the proposal was revised to meet the requests of commuters on the affected routes.

• Comment: Route 44 – Provide Local Service in Lucas Valley (2)

Two (2) comments expressed concern about the cancellation of Route 44 and suggested that local service be provided in Lucas Valley. The revised proposal would maintain service in Lucas Valley on Route 38A. Local service is the responsibility of Marin Transit, which currently provides local service in Lucas Valley on Route 139.

• Comment: Route 24 - Operate Route 24A to/from San Anselmo Hub (1)

One (1) comment opposed the proposal because Route 24A would start or end at College of Marin rather than San Anselmo Hub. The revised proposal would increase service on Route 24 rather than create Route 24A; Route 24 serves San Anselmo.

• Comment: Route 54 – Operate Route 54C to Novato Blvd. (1)

One (1) comment opposed the proposal because Route 54C would not continue to serve Novato Blvd. at Wilson Avenue. The revised proposal would provide service at this location on Route 56X only; passengers would have to transfer at the Golden Gate Bridge Toll Plaza to frequent service available on any San Francisco Civic Center-bound bus to complete their trips. Alternatively, direct service on Route 54C would continue to be available at Seventh Street, which is approximately 0.8 miles east of this location.

• Comment: Routes 54 and 56 – Keep San Marin Service Unchanged (1)

One (1) comment expressed opposition to the proposal because the person preferred the existing service levels on Routes 54 and 56 in San Marin over the revised Route 56X. The revised proposal would provide Route 56X service only in San Marin because Routes 54 and 56 currently provide a high level of duplication. By reducing duplication, the District can reinvest these resources in expanded service on Route 56X, which would provide San Marin commuters with faster service (compared to Route 54) that is more frequent and has a longer service span (compared to Route 56).

• Comment: Route 38 – Provide Additional Afternoon Service (1)

One (1) comment expressed concern about the new Route 38 schedule and suggested that an additional trip leaving San Francisco at 3:30 PM be implemented. The revised proposal includes this additional trip to better serve the schedules of commuters in Terra Linda and Marinwood.

• Comment: General Concern About Proposal (1)

One (1) comment expressed general concern about the proposal but did not reference specific issues. Based on detailed feedback received by other commenters, the proposal was revised to meet the requests of commuters on the affected routes.

24

MONDAY - FRIDAY

COMMUTE ROUTE

PROPOSED

San Francisco Southbound

Manor - Fairfax - San Anselmo - Ross - College of Marin - Greenbrae - San Francisco

Notes	Route	Manor (Sir Francis Drake & Olema)	Fairfax (Sir Francis Drake & Claus)	San Anselmo (Sir Francis Drake & Bank)	Kentfield (Sir Francis Drake at College of Marin)	Greenbrae (Sir Francis Drake & Eliseo)	Larkspur Ferry Terminal	Lucky Drive Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco Civic Center (Golden Gate & Polk)	San Francisco (Folsom & 7th)	San Francisco (Perry & 4th)
	24	4:29a	4:32a	4:38a	4:43a	4:48a		4:50a	YES	5:20a			5:27a
Α	24			5:06a	5:11a	5:17a	5:20a	5:22a	YES	5:50a			5:57a
	24	5:24a	5:27a	5:33a	5:38a	5:44a		5:46a	YES	6:20a			6:28a
	24	5:51a	5:55a	6:01a	6:06a	6:13a		6:15a	YES	6:50a			6:58a
	24	6:18a	6:22a	6:28a	6:33a	6:40a		6:42a	YES	7:20a			7:29a
	24	6:36a	6:40a	6:46a	6:51a	6:58a		7:00a	YES	7:40a			7:49a
Α	24X	6:49a	6:53a	6:59a	7:04a				YES	7:50a			7:59a
	24	6:56a	7:00a	7:06a	7:11a	7:18a		7:20a	YES	8:00a			8:10a
	24	7:07a	7:12a	7:19a	7:25a	7:34a		7:36a	YES	8:20a			8:30a
	24C	7:13a	7:18a	7:25a	7:31a	7:40a		7:42a	YES		8:20a	8:28a	8:34a
Α	24X	7:21a	7:26a	7:33a	7:39a				YES	8:30a			8:40a
	24	7:29a	7:34a	7:41a	7:47a	7:56a		7:58a	YES	8:40a			8:50a
	24	7:44a	7:49a	7:56a	8:02a	8:11a		8:13a	YES	8:55a			9:05a
	24	7:51a	7:56a	8:06a	8:12a	8:21a		8:23a	YES	9:15a			9:25a
	24	8:16a	8:21a	8:31a	8:37a	8:46a		8:48a	YES	9:35a			9:45a
·	24	8:45a	8:50a	9:00a	9:06a	9:15a		9:18a	YES	10:00a			10:10a

A: This trip operates via Broadway Tunnel.

24

MONDAY - FRIDAY

COMMUTE ROUTE

Fairfax/Manor Northbound

PROPOSED

San Francisco - Greenbrae - College of Marin - Ross - San Anselmo - Fairfax - Manor

Notes	Route	San Francisco (Perry & 3rd)	San Francisco Financial District (Pine & Battery)	San Francisco (7th & Market)	San Francisco Civic Center (McAllister & Polk)	Golden Gate Bridge Toll Plaza	Lucky Drive Bus Pad	Greenbrae (Sir Francis Drake & Eliseo)	Kentfield (Sir Francis Drake at College of Marin)	San Anselmo (Sir Francis Drake & Bank)	Fairfax (Sir Francis Drake & Claus)	Manor (Sir Francis Drake & Glen)
	24	2:30p	2:40p			YES	3:26p	3:29p	3:34p	3:40p	3:47p	3:51p
	24	2:59p	3:10p			YES	3:56p	3:59p	4:04p	4:11p	4:21p	4:25p
	24	3:30p	3:40p			YES	4:27p	4:30p	4:36p	4:44p	4:54p	4:58p
	24	3:57p	4:10p			YES	4:57p	5:00p	5:06p	5:15p	5:25p	5:29p
	24	4:17p	4:30p			YES	5:08p	5:11p	5:17p	5:26p	5:36p	5:40p
Α	24X	4:27p	4:40p			YES			5:22p	5:31p	5:41p	5:45p
	24	4:37p	4:50p			YES	5:40p	5:43p	5:49p	5:58p	6:08p	6:12p
	24	4:57p	5:10p			YES	6:00p	6:03p	6:09p	6:15p	6:25p	6:29p
Α	24X	5:07p	5:20p			YES			6:14p	6:20p	6:30p	6:34p
	24	5:17p	5:30p			YES	6:18p	6:21p	6:27p	6:33p	6:43p	6:47p
	24C	5:21p		5:33p	5:38p	YES	6:27p	6:30p	6:35p	6:40p	6:50p	6:54p
	24	5:27p	5:40p			YES	6:24p	6:27p	6:33p	6:38p	6:48p	6:52p
	24	5:58p	6:10p			YES	6:51p	6:53p	6:59p	7:04p	7:13p	7:17p
	24	6:29p	6:40p			YES	7:15p	7:17p	7:23p	7:28p	7:37p	7:41p
	24	7:00p	7:10p			YES	7:44p	7:46p	7:51p	7:55p	8:03p	8:07p

A: This trip operates via Broadway Tunnel.

PROPOSED

Southbound San Anselmo - San Rafael - San Francisco

Notes	San Anselmo Hub (Center & Sir Francis Drake)	San Rafael Transit Center (3rd & Hetherton)	Lucky Drive Bus Pad	Paradise Drive Bus Pad	Tiburon Wye Bus Pad	Seminary Drive Bus Pad	Spencer Avenue Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco Financial District (Davis & California)	San Francisco (Perry & 4th)
Α		4:30a	4:33a	4:35a	4:37a	4:38a	4:42a	YES	5:05a		5:14a
	5:53a	6:06a						YES	6:41a		6:50a
	6:23a	6:36a						YES	7:15a		7:25a
	6:49a	7:03a						YES	7:45a		7:55a
	7:02a	7:15a						YES	8:00a		8:12a
	7:20a	7:33a						YES	8:15a		8:25a
	7:35a	7:48a						YES	8:30a		8:40a
	7:50a	8:03a						YES	8:45a		8:55a
	8:20a	8:33a						YES	9:20a		9:32a
	8:50a	9:03a						YES	9:50a		10:02a
	9:22a	9:35a	9:42a	9:44a	9:46a	9:47a	9:50a	YES		10:25a	10:39a
	10:22a	10:35a	10:42a	10:44a	10:46a	10:47a	10:50a	YES		11:25a	11:39a
	11:22a	11:35a	11:42a	11:44a	11:46a	11:47a	11:50a	YES		12:25p	12:39p
	12:22p	12:35p	12:42p	12:44p	12:46p	12:47p	12:50p	YES		1:25p	1:39p
	1:22p	1:35p	1:42p	1:44p	1:46p	1:47p	1:50p	YES		2:25p	2:39p
<u> </u>	2:22p	2:35p	2:42p	2:44p	2:46p	2:47p	2:50p	YES		3:25p	3:39p
	3:21p	3:35p	3:44p	3:46p	3:48p	3:49p	3:52p	YES		4:32p	4:46p
	4:20p	4:35p	4:44p	4:46p	4:48p	4:49p	4:52p	YES		5:32p	5:46p
	5:20p	5:35p	5:44p	5:46p	5:48p	5:49p	5:52p	YES		6:29p	6:40p

A: This trip operates via Broadway Tunnel.

MONDAY - FRIDAY

San Anselmo Northbound

San Francisco - San Rafael - San Anselmo

COMMUTE ROUTE

PROPOSED

San Francisco (Perry & 3rd)	San Francisco Financial District (Fremont & Mission)	Golden Gate Bridge Toll Plaza	Spencer Avenue Bus Pad	Seminary Drive Bus Pad	Tiburon Wye Bus Pad	Paradise Drive Bus Pad	Lucky Drive Bus Pad	San Rafael Transit Center (3rd & Hetherton)	San Anselmo Hub (Center & Sir Francis Drake)
7:52a	8:00a	YES	8:33a	8:37a	8:38a	8:40a	8:42a	8:50a	9:03a
8:54a	9:02a	YES	9:34a	9:38a	9:39a	9:41a	9:43a	9:50a	10:03a
9:54a	10:02a	YES	10:34a	10:38a	10:40a	10:44a	10:48a	10:55a	11:10a
10:54a	11:02a	YES	11:34a	11:38a	11:40a	11:44a	11:48a	11:55a	12:10p
11:49a	11:57a	YES	12:34p	12:38p	12:40p	12:44p	12:48p	12:55p	1:10p
12:49p	12:57p	YES	1:34p	1:38p	1:40p	1:44p	1:48p	1:55p	2:10p
1:49p	1:57p	YES	2:34p	2:38p	2:40p	2:44p	2:48p	2:55p	3:10p
2:43p	2:51p	YES	3:28p	3:33p	3:35p	3:41p	3:46p	3:55p	4:10p
3:27p	3:37p	YES						4:37p	4:52p
3:57p	4:07p	YES						5:07p	5:22p
4:26p	4:37p	YES						5:38p	5:54p
4:53p	5:05p	YES						6:05p	6:21p
5:08p	5:20p	YES						6:13p	6:24p
5:37p	5:50p	YES						6:43p	6:53p
6:30p	6:41p	YES						7:30p	7:40p

San Francisco

Southbound

COMMUTE ROUTE

PROPOSED

Lucas Valley - Marinwood - Terra Linda - Northgate - San Francisco

Route	Marinwood (Miller Creek & Marinwood)	Lucas Valley (Mt. McKinley & Idylberry)	Marinwood (Miller Creek & Cedarberry)	Terra Linda (De la Guerra & Del Ganado)	Terra Linda (Freitas & Montecillo)	Terra Linda (Las Gallinas at Northgate Mall)	San Rafael (Merrydale & N San Pedro)	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco (Perry & 4th)
38	6:04a		6:07a	6:19a		6:28a	6:34a	YES	7:15a	7:26a
38A	6:26a	6:34a	6:42a		6:51a	6:57a	7:03a	YES	7:45a	7:56a
38	6:55a		6:58a	7:10a		7:19a	7:25a	YES	8:15a	8:26a
38A	7:14a	7:22a	7:30a		7:39a	7:45a	7:51a	YES	8:45a	8:56a
38	7:51a		7:54a	8:06a		8:15a	8:21a	YES	9:15a	9:26a

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MONDAY - FRIDAY

COMMUTE ROUTE

Terra Linda/Marinwood Northbound

PROPOSED

San Francisco - Northgate - Terra Linda - Marinwood - Lucas Valley

Route	San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	Golden Gate Bridge Toll Plaza	San Rafael (N San Pedro & Merrydale)	Terra Linda (Las Gallinas at Northgate Mall)	Terra Linda (Freitas & Montecillo)	Terra Linda (De la Guerra & Del Ganado)	Marinwood (Miller Creek & Cedarberry)	Lucas Valley (Mt. McKinley & Idylberry)	Marinwood (Miller Creek & Marinwood)
38	3:30p	3:42p	YES	4:42p	4:46p		4:55p	5:06p		5:09p
38A	4:00p	4:12p	YES	5:12p	5:16p	5:22p		5:30p	5:38p	5:46p
38	4:30p	4:42p	YES	5:38p	5:42p		5:51p	6:02p		6:05p
38A	5:00p	5:12p	YES	6:05p	6:09p	6:15p		6:23p	6:31p	6:39p
38	5:30p	5:42p	YES	6:35p	6:39p		6:48p	6:59p		7:02p

PROPOSED

Novato	- Ignacio	o - San	Francisco

Route	Novato GGT (Golden Gate PI)	Novato (7th & Grant)	Novato (S Novato & Sunset)	lgnacio (Enfrente & Salvatore)	Alameda del Prado Bus Pad	Marinwood Bus Pad	Lucas Valley Bus Pad	Terra Linda Bus Pad	N San Pedro Rd Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco Civic Center (Golden Gate & Polk)	San Francisco (Folsom & 7th)	San Francisco (Perry & 4th)
54	4:48a	4:53a	4:59a	5:04a	5:07a	5:09a	5:10a	5:12a	5:14a	YES	5:50a			5:59a
54	5:17a	5:22a	5:28a	5:33a	5:36a	5:38a	5:39a	5:41a	5:43a	YES	6:20a			6:29a
54	5:46a	5:51a	5:57a	6:02a	6:05a	6:07a	6:08a	6:10a	6:12a	YES	6:50a			6:59a
54	6:07a	6:13a	6:19a	6:27a	6:31a					YES	7:15a			7:24a
54	6:29a	6:35a	6:42a	6:50a	6:54a					YES	7:40a			7:49a
54C	6:33a	6:39a	6:46a	6:54a	6:58a	7:00a	7:01a	7:03a	7:05a	YES		7:50a	7:54a	7:59a
54	6:42a	6:48a	6:55a	7:03a	7:07a					YES	8:00a			8:10a
54	6:59a	7:05a	7:12a	7:20a	7:24a					YES	8:25a			8:35a
54	7:20a	7:26a	7:33a	7:41a	7:45a					YES	8:50a			9:02a
54	7:43a	7:49a	8:00a	8:10a	8:15a					YES	9:20a			9:32a
54	8:18a	8:24a	8:31a	8:41a	8:46a					YES	9:50a			10:02a

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MONDAY - FRIDAY

COMMUTE ROUTE

PROPOSED

Novato Northbound San Francisco - Ignacio - Novato

Route	San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	San Francisco (7th & Market)	San Francisco Civic Center (McAllister & Polk)	Golden Gate Bridge Toll Plaza	N San Pedro Rd Bus Pad	Terra Linda Bus Pad	Lucas Valley Bus Pad	Marinwood Bus Pad	Alameda del Prado Bus Pad	Ignacio Bus Pad	Novato (S Novato & Sunset)	Novato (7th & Grant)	Novato GGT (Golden Gate PI)
54	2:33p	2:40p			YES	3:37p	3:39p	3:40p	3:42p	3:44p	3:46p	3:51p	3:58p	4:04p
54	3:02p	3:10p			YES	4:10p	4:12p	4:13p	4:15p	4:17p	4:20p	4:25p	4:32p	4:38p
54	3:31p	3:40p			YES					4:43p	4:46p	4:51p	4:59p	5:05p
54	3:59p	4:10p			YES					5:14p	5:17p	5:22p	5:30p	5:36p
54	4:23p	4:35p			YES					5:39p	5:42p	5:47p	5:54p	6:00p
54	4:43p	4:55p			YES					5:57p	6:00p	6:05p	6:12p	6:18p
54C	5:00p		5:09p	5:13p	YES	6:04p	6:06p	6:07p	6:09p	6:11p	6:14p	6:19p	6:26p	6:32p
54	5:03p	5:15p			YES					6:19p	6:22p	6:27p	6:34p	6:40p
54	5:28p	5:40p			YES					6:43p	6:46p	6:51p	6:58p	7:04p
54	6:01p	6:10p			YES					7:01p	7:03p	7:08p	7:15p	7:20p
54	6:31p	6:40p			YES	7:28p	7:30p	7:31p	7:33p	7:35p	7:37p	7:42p	7:49p	7:54p
54	7:01p	7:10p			YES	7:58p	8:00p	8:01p	8:03p	8:05p	8:07p	8:12p	8:19p	8:24p

San Francisco Southbound

PROPOSED

San Marin - Novato - San Francisco

Novato GGT (Golden Gate PI)	Novato (7th & Grant)	Novato (Novato & Wilson)	San Marin (San Marin & San Andreas)	San Marin (San Carlos & San Marin)	Atherton Ave Bus Pad	Rowland Blvd Park & Ride	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco (Perry & 4th)
4:34a	4:39a	4:42a	4:46a	4:50a	4:55a	5:01a	YES	5:50a	5:59a
5:03a	5:08a	5:11a	5:15a	5:19a	5:24a	5:30a	YES	6:20a	6:29a
5:32a	5:37a	5:40a	5:44a	5:48a	5:53a	5:59a	YES	6:50a	6:59a
5:55a	6:00a	6:03a	6:08a	6:13a	6:18a	6:24a	YES	7:15a	7:24a
6:14a	6:20a	6:23a	6:28a	6:33a	6:38a	6:44a	YES	7:40a	7:49a
6:34a	6:40a	6:43a	6:48a	6:53a	6:58a	7:04a	YES	8:00a	8:10a
6:46a	6:52a	6:55a	7:00a	7:05a	7:10a	7:16a	YES	8:25a	8:35a
7:05a	7:11a	7:14a	7:19a	7:25a	7:30a	7:36a	YES	8:50a	9:02a
7:40a	7:46a	7:49a	7:53a	7:59a	8:04a	8:10a	YES	9:20a	9:32a
8:15a	8:21a	8:24a	8:28a	8:34a	8:39a	8:45a	YES	9:50a	10:02a

MONDAY - FRIDAY

COMMUTE ROUTE

San Marin Northbound

San Francisco - Novato - San Marin

PROPOSED

	San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	Golden Gate Bridge Toll Plaza	Rowland Blvd Park & Ride	Atherton Ave Bus Pad	San Marin (San Carlos & San Marin)	San Marin (San Marin & San Andreas)	Novato (Novato & Raposa Vista)	Novato (7th & Grant)	Novato GGT (Golden Gate PI)
	2:59p	3:07p	YES	4:08p	4:11p	4:16p	4:20p	4:24p	4:29p	4:35p
	3:28p	3:37p	YES	4:38p	4:41p	4:46p	4:50p	4:54p	4:59p	5:05p
	3:56p	4:07p	YES	5:08p	5:11p	5:16p	5:20p	5:24p	5:29p	5:35p
	4:20p	4:32p	YES	5:33p	5:36p	5:41p	5:45p	5:49p	5:54p	6:00p
_	4:40p	4:52p	YES	5:53p	5:56p	6:01p	6:05p	6:09p	6:14p	6:20p
	5:00p	5:12p	YES	6:16p	6:19p	6:24p	6:28p	6:32p	6:37p	6:43p
	5:25p	5:37p	YES	6:36p	6:39p	6:44p	6:48p	6:52p	6:57p	7:03p
	5:58p	6:07p	YES	7:03p	7:06p	7:11p	7:14p	7:18p	7:23p	7:28p
	6:28p	6:37p	YES	7:33p	7:36p	7:41p	7:44p	7:48p	7:53p	7:58p
	6:58p	7:07p	YES	8:03p	8:06p	8:11p	8:14p	8:18p	8:23p	8:28p

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MONDAY - FRIDAY

San Francisco

COMMUTE ROUTE

PROPOSED

Southbound Novato - Ignacio - Hamilton - San Francisco

Novato GGT (Golden Gate PI)	Novato (Redwood & Grant)	DeLong Ave Bus Pad	lgnacio (Enfrente & Salvatore)	Hamilton Theater Parking Lot	Hamilton (Alameda del Prado & Nave)	Marinwood Bus Pad	Lucas Valley Bus Pad	Terra Linda Bus Pad	Golden Gate Bridge Toll Plaza	San Francisco Financial District (Battery & Pine)	San Francisco (Perry & 4th)
6:05a	6:09a	6:11a	6:19a	6:25a	6:30a	6:33a	6:35a	6:37a	YES	7:20a	7:29a
6:28a	6:32a	6:35a	6:43a	6:48a	6:53a	6:56a	6:58a	7:01a	YES	7:50a	7:59a
6:44a	6:48a	6:51a	7:01a	7:08a	7:16a	7:20a	7:23a	7:26a	YES	8:20a	8:31a
7:07a	7:11a	7:14a	7:29a	7:33a	7:40a	7:43a	7:46a	7:49a	YES	8:50a	9:01a

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MONDAY - FRIDAY

COMMUTE ROUTE

Hamilton/Novato Northbound

PROPOSED

San Francisco - Hamilton - Ignacio - Novato

San Francisco (Perry & 3rd)	SF Financial District (Fremont between Mission & Market)	Golden Gate Bridge Toll Plaza	Terra Linda Bus Pad	Lucas Valley Bus Pad	Marinwood Bus Pad	Hamilton (Nave & Bolling)	Hamilton Theater Parking Lot	Ignacio Bus Pad	DeLong Ave Bus Pad	Novato (Redwood & Grant)	Novato GGT (Golden Gate PI)
3:57p	4:09p	YES	5:11p	5:12p	5:13p	5:15p	5:18p	5:23p	5:25p	5:27p	5:30p
4:27p	4:39p	YES	5:41p	5:42p	5:43p	5:45p	5:48p	5:53p	5:55p	5:57p	6:00p
4:57p	5:09p	YES	6:11p	6:12p	6:13p	6:15p	6:18p	6:23p	6:25p	6:27p	6:30p
5:27p	5:39p	YES	6:38p	6:39p	6:40p	6:42p	6:45p	6:49p	6:51p	6:53p	6:56p

