

**Metropolitan Transportation Commission
Regional Network Management Committee**

July 11, 2025

Agenda Item 2d

Title VI Fare Equity Analysis – Clipper BayPass Phase 2 Pilot Program

Subject:

Fare equity analysis, prepared under the requirements of the Federal Transit Administration’s Title VI Circular, of the Clipper BayPass program’s second pilot phase.

Background:

In January 2024, MTC and San Francisco Bay Area transit agency partners launched the second phase of the Clipper BayPass Pilot Program. This pilot program offers an unlimited transit pass to institutions in the Bay Area to purchase for their members. In mid-2023, the Federal Transit Administration (FTA) advised MTC and the partner transit agencies that an equity analysis, consistent with the FTA’s Title VI Circular, should be prepared for this second phase of the Pilot.

To provide support in developing the analysis, MTC procured the services of a consultant, Steer, Davies, and Gleave Inc. (Steer), to conduct the equity analysis in partnership with MTC staff. Steer was selected from a pool of applicants who responded to a Request for Proposal due to its technical knowledge of Title VI and experience in the Bay Area transit ecosystem.

Following the procurement, MTC worked with Steer to develop an appropriate methodology for analyzing the equity impacts of the Clipper BayPass Phase 2 Pilot Program. A methodology was selected that analyzed the demographics of transit access expansion.

Steer analyzed the demographics of the Clipper BayPass Pilot participants and the demographics of the Bay Area transit riding public at the time the study was conducted to determine whether transit access was being expanded in an equitable manner. The most stringent equity thresholds from the transit agencies subject to Title VI requirements were used for this analysis to determine the existence of a disparate impact or disproportionate burden.

The analysis found neither disparate impact nor disproportionate burden for any population of concern and therefore recommends no mitigation measures be implemented. Staff concur with these findings and recommendations.

Issues:

None identified

Recommendations:

Information

Attachments:

- Attachment A: Title VI Equity Analysis Report for Clipper® BayPass Phase 2 Pilot Program



Andrew B. Fremier