



Title VI Triennial Program Update (2023-2025)

Office of Civil Rights

JANUARY 2025



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Introduction

The San Francisco Bay Area Rapid Transit District (BART or the District), as a federal grant recipient, is required by the Federal Transit Administration (FTA) to conform to Title VI of the Civil Rights Act of 1964 and its amendments (Act). Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Executive Orders issued in 2025 have not been applied to the Triennial Program update as the Circular has not been updated to reflect any referenced Executive Orders that have now been rescinded (i.e. Executive Order No. 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations; Presidential Executive Order No. 13166 "Improving Access to Services for Persons with Limited English Proficiency" addresses services to those individuals with Limited English Proficiency (LEP)). The District awaits further FTA guidance on future Program updates resulting from the rescission of these Executive Orders.

The District is committed to enforcing the provisions of Title VI and all applicable laws and regulations that affect the District and those organizations—both public and private—which participate in or benefit from its programs. To assure conformance with the Act, BART is required to conduct a triennial assessment and document that services and benefits are provided on a nondiscriminatory basis.

This report includes the required updated assessment of BART's Title VI Program that demonstrates compliance with the Act as defined by FTA Circular 4702.1B, dated October 1, 2012, entitled TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS. This triennial report covers the period January 1, 2022, to December 31, 2025.

General Requirements and Guidelines

Notification to Beneficiaries of Protection Under Title VI

To comply with 49 CFR Section 21.9(d), BART provides information to the public regarding its Title VI obligations and appraises members of the public of the protections against discrimination afforded to them by Title VI ([Appendix 1A](#)). BART's Title VI Statement of Policy, Complaint Procedures and Complaint Form ([Appendix 1B](#)) are available upon request from the Office of Civil Rights and on bart.gov/titlevi.

Title VI Complaint Procedures and Complaint Form

BART is committed to ensuring that no person is discriminated against on the basis of race, color, or national origin, as prohibited by Title VI of the Civil Rights Act of 1964. To ensure compliance with 49 CFR Section 21.9(b), BART developed procedures for investigating and tracking Title VI complaints filed. Any person who believes that they are a victim of such discrimination may file a complaint with BART's Office of Civil Rights within one-hundred and eighty (180) calendar days of the last alleged incident.

BART's Title VI Statement of Policy, Complaint Procedures and Complaint Form ([Appendix 1B](#)) are available upon request from the Office of Civil Rights and can be downloaded from bart.gov/titlevi. Both the Title VI Complaint Form and Title VI Complaint Procedures have been translated into the 21 languages identified in the Title VI Language Assistance Plan ([Appendix 5](#)). A translation summarizing staff assistance and language assistance availability is included in the Title VI Complaint Procedures.

Recording and Reporting of Title VI Investigations, Complaints, and Lawsuits

To comply with 49 CFR Section 21.9(b), BART's Office of Civil Rights maintains a list of all active complaint investigations which name the recipient and/or subrecipient that allege discrimination on the basis of race, color, or national origin. This list includes the date of the investigation, lawsuit, or complaint filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken in response to the investigation, lawsuit, or complaint. [Appendix 1D](#), outlines a list of the District's investigations, lawsuits, and complaints.

Promoting Inclusive Public Participation

Pursuant to FTA Title VI regulatory guidance, federal funding recipients and subrecipients should seek out and qualitatively consider the viewpoints of minority, low income and Limited English Proficient (LEP) populations in public participation activities. To meet these requirements, in 2011 BART developed the Public Participation Plan (PPP), a guide for how BART will deepen and sustain its efforts to engage diverse community members throughout its service area. A copy of the PPP is available to the public and can be accessed online at bart.gov/titlevi. BART has continued to follow the methodology for public outreach.

The PPP includes example public participation strategies, designed using the PPP goals, principles, and methods. The PPP guides BART's ongoing public involvement endeavors to ensure the most effective means of providing information and receiving public input on transportation issues, with particular emphasis on involving traditionally underrepresented groups.

BART continues to outreach for inclusive public participation in the following ways:

- Manage two advisory committees: Title VI/Environmental Justice and LEP advisory committees focused on Title VI compliance.
 - BART just completed a recruitment effort to onboard new, additional members to start in 2022-2024.
- Maintain and annually update its database of community-based organizations which has proven helpful for both recruitment and dissemination of information.
 - For example, the collaboration with Metropolitan Transportation Commission and regional operators for the Clipper Bay Pass project and the upcoming Clipper 2.0 review.

- Improved outreach and increase public participation from riders by publicizing events and survey links through station signage and electronic destination signs (DSS), through social media (Twitter, Facebook, BART.gov website), hosting more events at stations, and utilizing staff/interpreters at outreaches during peak commute hours.
- Collect information on riders' demographic data through multi-lingual print and online surveys. Input of such demographic information is optional for the survey respondent.
- Quarterly office hours with the Title VI/environmental Law Committee, Limited English Proficiency Committee, and the BART Accessibility Task Force.

A review of the 2011 PPP determines that it is still relevant and applicable to BART's current public participation practices and policies. The review also determined that it is following FTA Circular 4702.1B Title VI regulations. Accordingly, rather than change the compliant and effective PPP, in October 2015, BART created a condensed document of the PPP, called the Public Participation Procedures (PPPPro), for BART internal use. The PPPPro was designed as a quick reference guide for BART staff when conducting public participation outreach, particularly outreach to the minority, low-income, and LEP communities. The PPPPro continues to add value to BART's PPP and remains a helpful resource for BART staff because the manual ensures and encourages staff to outreach appropriately to the priority communities defined by BART Title VI policies. A recent ongoing review of the PPPPro finds that the content is still applicable. A copy of the PPPPro is provided in [Appendix 2A](#). Prior to the next Triennial Program update, BART staff will continue to perform a comprehensive update to the PPP and PPPPro to capture emerging inclusive public participation best practices.

While there are many projects where staff reached out to the Office of Civil Rights for guidance on public participation, staff compiled a list of BART's Title VI Public Participation activities from January 1, 2023 to December 31, 2025 in [Appendix 2B](#) as examples of inclusive public participation.

Providing Meaningful Access to LEP Persons

BART supports the goals of Title VI of the Civil Rights Act of 1964, DOT's implementing regulations to provide meaningful access to its services by individuals with Limited English Proficiency (LEP). Under these regulations, programs and activities normally provided in English must be accessible to persons who have a limited ability to speak, read, write, or understand prior Triennial Updates - Chapter II General Requirements and Guidelines - Page 5 English. BART conducted its four-factor analysis to identify appropriate language assistance measures needed to improve access to BART's services and benefits for LEP persons. BART's updated Language Assistance Plan (LAP) is attached to this report ([Appendix 3](#)).

Minority Representation on Planning and Advisory Bodies

To comply with 49 CFR Section 21.5(b)(1)(vii), BART's Office of Civil Rights maintains a voluntary list depicting the racial breakdown of the membership of its transit-related non-elected planning boards, advisory councils and committees and descriptions of efforts made to encourage the participation of minorities on its

committees. Each of Title VI team members participate in personal outreach to encourage minority committees include sourcing contact lists from minority committee members, doing outreach to organizations within the BART network that support minority communities, and communicating broadly to the minority contact list of board opportunities during committee meetings and “office hours”. Table 1 illustrates BART’s non-elected advisory councils and committees, followed by a description of each committee’s roles and responsibilities.

TABLE 1. MINORITY REPRESENTATION ON BART NON-ELECTED ADVISORY COMMITTEES

[illegible]

Non-Elected Advisory Committee	Asian/Pacific Islander	Black/African American	Hispanic /Latino	American Indian	White	Unknown	Total # of Members

BART Accessibility Task Force

The BART Accessibility Task Force advises the BART Board of Directors and staff on disability-related issues and advocates on behalf of people with disabilities and seniors to make the BART system accessible to and useable by people regardless of disability or age. All meetings are open to the public. Membership on the BART Accessibility Task Force is by appointment by the Board of Directors.

More information can be found at bart.gov/about/bod/advisory/accessibility.

Bicycle Advisory Task Force

The Bicycle Task Advisory Force is charged with reviewing and working with BART to improve bicycle access to and on BART, including advising on project priorities that affect bicyclists using the BART system. The task force structure allows for fifteen members: three from each of the five counties that BART serves (Alameda, Contra Costa, San Francisco, San Mateo and Santa Clara). Members are appointed by each county's Bicycle Advisory Committee or its primary bicycle advocacy organization.

More information can be found at bart.gov/about/bod/advisory/bicycle.

Business Advisory Council

The Business Advisory Council (BAC) advises BART in its efforts to ensure that Disadvantaged, Minority, Women, and Small Business Enterprises are afforded opportunities to participate in construction contracts, professional and technical services agreements, and goods and services contracts. The BAC includes representatives from local businesses and community organizations. The BAC looks at contracting and business practices and advises on ways to improve and promote opportunities for small businesses, including minority and women-owned businesses. The Office of Civil Rights looks for representatives from businesses in the areas of professional services, construction, and procurement to ensure a balance of representation in these three areas.

More information can be found at bart.gov/about/bod/advisory/business.

BART Police Citizen Review Board

The BART Police Citizen Review Board (BPCRB) shall have the authority to exercise its duties and responsibilities as outlined in the [BART Citizen Oversight Model](#), with regard to law enforcement and police activities or personnel operating under the authority of the District. The BPCRB consists of 11 members

appointed as follows: Each BART Director appoints one member, the BART Police Managers' Association and BART Police Officers' Association jointly appoint one member, and the Board of Directors appoint one public-at-large member. All appointments or re-appointments are for two-year terms. Members of the BPCRB will work to increase the public's confidence in BART's policing services by reviewing, recommending and monitoring the implementation of changes to police policies, procedures and practices, receiving citizen allegations of on-duty police misconduct, advising Board of Directors, General Manager, Independent Police Auditor and Police Chief, participating in recommending appropriate disciplinary action, meeting periodically with representatives of the BART Police association, and participating in community outreach.

More information can be found at bart.gov/about/bod/advisory/crb.

Limited English Proficiency Advisory Committee

The Limited English Proficiency (LEP) Advisory Committee consists of members of community-based organizations (CBOs) that serve LEP populations within the BART service area. The committee assists in the development of the District's language assistance measures and provides input on how the District can provide programs and services to customers, regardless of language ability. The committee consists of members or active participants of CBOs within BART's service area that serve LEP populations. To recruit new members, staff directly contact CBOs to notify them of the application process to participate on the committee.

More information can be found at bart.gov/about/bod/advisory/lep.

Title VI Advisory Committee

The Title VI Advisory Committee ensures the District is taking reasonable steps to incorporate Title VI policy principles in its transportation decisions. It is BART policy that changes to services, capital programs, plans, or policies neither cause a disproportionate share of adverse effects nor deny equal access to benefits to a segment of the population because of race, ethnicity, national origin, or socioeconomic characteristics. Through the committee, the District encourages the full and fair participation of minority and low-income populations in the District's transportation decision-making process. Committee members provide input on effective methods to engage with communities impacted by Title VI policies. The committee consists of members or active participants of CBOs within BART's service area that are involved in advancing Title VI issues. To recruit new members, staff directly contact CBOs to notify them of the application process to participate on the committee.

More information can be found at bart.gov/about/bod/advisory/titleviej.

Transit Security Advisory Committee

In 2011, Assembly Bill 716 granted BART police officers the authority to issue prohibition orders to offenders who are cited or arrested for certain offenses. In 2017, Assembly Bill 730 made this authority permanent. The goal of prohibition orders is to reduce the number of crime-related disruptions in the BART system. As mandated by law, the BART Transit Security Advisory Committee (TSAC) was created; it meets with BART staff

at least every quarter to ensure nondiscrimination in the administration and enforcement of prohibition orders. Board-appointed members of TSAC are professionals in the areas of mental health, homelessness, public safety, youth advocacy, and cultural awareness. More specifically, TSAC meets to provide recommendations regarding training for individuals with responsibility for issuance and enforcement of prohibition orders; identify services and programs to which persons that are homeless or mentally ill may be referred by BART Police prior to or in conjunction with the issuance of a prohibition order; monitor the issuance of prohibitions orders; and provide an annual report to the BART Board of Directors and the California State Legislature.

More information can be found at bart.gov/about/bod/advisory/tsac.

Measure RR Bond Oversight Committee

In November 2016, voters passed Measure RR, which authorized BART to issue bonds for \$3.5 billion to rebuild the aging BART system. The overall goal of the rebuilding program is to make the system safer and more reliable and to reduce traffic. Measure RR required BART to establish an independent Bond Oversight Committee (BOC) to verify BART spends the bond revenues as promised.

More information can be found at bart.gov/about/bod/advisory/bond.

Assisting and Monitoring Subrecipients

In accordance with FTA Circular 4702.1B, BART developed procedures to provide assistance to subrecipients, distribute funds in an equitable and nondiscriminatory way, and to monitor subrecipients' compliance with Title VI. BART requires subrecipients to document that FTA funding was distributed in accordance with the requirements of Title VI by submitting an annual self-certification and assurance. The annual review requires subrecipients to demonstrate compliance by asserting whether they: developed Title VI complaint procedures; kept records of all Title VI investigations, complaints, and lawsuits; provided meaningful access to persons with limited English proficiency; and provided notice to beneficiaries under Title VI.

For this triennial reporting period, BART has one subrecipient subject to FTA Circular requirements. For this subrecipient, BART developed a Title VI subrecipient training program and held a Title VI Subrecipient Monitoring Workshop to inform them of their requirements under Title VI as well as a schedule of the due dates for their respective program updates. During the workshop BART provided a subrecipient monitoring checklist which serves to document that the subrecipient has implemented or will be able to implement the required process and procedures.

A copy of the Subrecipient Monitoring Checklist and PowerPoint workshop presentation can be found in appendices [4A](#) and [4B](#). Sample program documents were also provided to subrecipients which included: Title VI Program Updates, Notices to the Public, Complaint form, Public Participation Plan, and Language Assistance Plan.

Once BART receives a subrecipient's Title VI Program Update, BART will inform the subrecipient in writing that BART has received the Title VI Program Update and a review will be completed within 60 days. After a review

of the subrecipient's Program Update, BART will determine if the update is compliant or noncompliant with the FTA Circular requirements. If the Program Update is compliant, BART will send written notification informing the subrecipient of their compliance and the next triennial due date for its Title VI Program Update. If the subrecipient's Program Update is noncompliant, BART will inform the subrecipient in writing of the deficient areas and offer assistance to correct deficiencies.

BART has received completed Title VI Program Updates from its sole subrecipient. A copy of the Title VI Subrecipient Annual Certification form can be found in [Appendix 4C](#). BART will continue to provide its subrecipient with assistance via in-person or conference call meetings to support subrecipients in their compliance efforts.

Determination of Site or Location of Facilities

To ensure compliance with 49 CFR Section 21.9(b)(3), BART is to conduct a Title VI equity analysis for new locations or facilities to ensure locations are selected without regard to race, color, or national origin. BART purchased a new BART Police headquarters, and a siting analysis was completed and approved by the Board of Directors. Appendix 5

BART Board Approval of 2025 Title VI Program Update

To comply with 49 CFR Section 21.9, BART is required to document its Title VI compliance by submitting a Title VI Program to its FTA regional civil rights office once every three years, or as otherwise directed by the FTA. The Title VI Program must be approved by the BART Board of Directors prior to submission to the FTA. [Appendix 6](#) contains BART's Board Materials from the meeting where the Board approved BART's Title VI Program Update.

I. Requirements and Guidelines for Fixed Route Transit Providers

To efficiently meet the requirements and regulations of the FTA Circular 4702.1B, BART staff have combined the 'System-wide Service Standards and Policies', 'Collection and Reporting of Demographic Data', and 'Monitoring Transit Service' requirements into one section.

System-wide Service Standards and Policies

In accordance with 49 CFR Section 21.5(b)(2), Section 21.5(b)(7) and Appendix C to 49 CFR part 21, Section (3)(iii), BART shall set service standards and policies for each specific fixed route mode of service provided. Service standards and policies ensure that service design and operation do not result in discrimination on the basis of race, color, or national origin. [Appendix 7](#) contains BART's System-wide Service Standards and Policies as originally approved and adopted by the Board of Directors in 2014. contains BART's Major Service Changes Policy, Public Participation Report, Board Approval Minutes (2016), and FTA Waiver Communication. There are no new service standards or policies for this period. This report considers the Board-adopted policies when monitoring system-wide service.

Service Standards & Monitoring

BART monitors its Service Standards and Policies on a line-by-line basis for each of its five lines. As shown in the system map below, BART's five lines are currently identified by the following colors and, as of 2025 provide the following basic service: Yellow (Antioch to SFO/Millbrae), Blue (Dublin/Pleasanton to Daly City), Orange (Richmond to Berryessa/North San José), Green (Berryessa/North San José to Daly City), and Red (Richmond to Millbrae/SFO).

FIGURE 1. BART SYSTEM MAP IN 2025



BART uses the BART Ridership Model (BRM), developed in 2015 and based on the results of its Station Profile Study of the same year, to determine station catchment areas. BART performed a new Station Profile Study in 2025, but the results were not available as of the date of this report. BART extended service on the Yellow Line in May 2018 east of the Pittsburg/Bay Point station using standard gauge, diesel multiple unit (DMU) trains. This new service, called eBART, extends service by an additional 9 miles and includes two stations, serving Pittsburg Center and Antioch. While BART is actively monitoring this service, there is currently insufficient data to perform a robust service standard analysis on these two stations. Because eBART uses different systems than standard BART, further review is needed to determine how to collect the appropriate data. BART also extended direct service on the Green and Orange lines in June of 2020 into Santa Clara County, serving stations at Milpitas and Berryessa.

Since BART began providing direct service between Millbrae and San Francisco International Airport (SFO) in 2019, the way it's operated has changed to address various customer and operational needs. This service has been operated as a "shuttle" with a single train traveling back and forth between the two stations. At other times, it operates as an extension of cross-bay service. Trains operating the Red Line serving Richmond now operate to both Millbrae and SFO; when that is not in service, the Yellow Line from Antioch is extended from SFO to Millbrae. When the shuttle is being operated as a separate service from the Red or Yellow Lines, it will be noted as such; otherwise, it will be considered part of the other Lines.

BART also provides shuttle service between the Coliseum station and Oakland International Airport (OAK). This discrete system uses automated guideway transit (AGT) technology and only provides direct service to the airport. As a result, it represents a different service model and, similar to BART to Antioch, further review is needed to determine whether an alternative analysis methodology should be implemented going forward.

Collection and Reporting of Demographic Data

Summary of BART Ridership Demographics

BART serves a diverse population within five counties in the San Francisco Bay Area. According to the most recent onboard survey of weekday and weekend passengers, the 2024 BART Customer Satisfaction Survey (conducted in fall 2024)¹, BART’s customer base is approximately 71% minority. This compares to a service area minority population of approximately 68% (2019-2023 ACS: 5-year estimates for the five-county service area)².

Looking at household income, serves a disproportionate share of low-income riders. In 2024, 28% of BART’s riders could be classified as low-income, compared to 18% of five-county households (2023 ACS 5-year estimates).

BART has adopted a definition of 200% of the federal poverty level to identify low-income households. This definition accounts for the high cost of living in the Bay Area and is consistent with the region’s metropolitan planning organization, the Metropolitan Transportation Commission’s definition. For reference, this threshold defined a four-person household with an annual household income under \$62,400 as low income in 2024.

BART uses this 200% threshold when compiling information about the service area’s low-income population. When compiling information specifically about BART’s ridership using survey data, the low-income definition has been modified slightly to make use of the survey income categories. (BART does not ask riders for their exact household incomes.) For example, a passenger who reports a household size of four and a household income of under \$60,000 (vs. under \$62,400) would be classified as low income in reported Customer Satisfaction 2024 survey data.

TABLE 2. 2025 POVERTY GUIDELINES: FEDERAL* AND THE BART SERVICE AREA

PERSONS IN FAMILY/HOUSEHOLD	POVERTY GUIDELINE (FEDERAL)	200% (BART SERVICE AREA)
1	\$15,650	\$31,300
2	\$21,150	\$42,300
3	\$26,650	\$53,300
4	\$32,150	\$64,300

² The ACS data for 2019-2023 are used throughout this report as the 5-year data for 2024 are not expected to be released until 12/11/25.

5	\$37,650	\$75,300
6	\$43,150	\$86,300
7	\$48,650	\$97,300
8	\$54,150	\$108,300
<p>* For the 48 Contiguous States and the District of Columbia Source: U.S. Department of Health & Human Services</p>		

Ridership Survey Data: 2024 BART Customer Satisfaction Study

BART conducts a system-wide survey of weekday and weekend passengers every two years. BART has conducted 13 of these surveys, the first in 1996 and the most recent in 2024. The primary purpose of the survey is to track key customer satisfaction measures and service attributes, so BART can stay in tune with its customers and focus its resources on key areas with the greatest impact potential. In addition to collecting passengers' satisfaction ratings, the survey asks passengers to provide some demographic information. This allows BART to compare its passengers' demographics against the demographics of the five-county service area.

The 2024 Customer Satisfaction questionnaire was available in English, Spanish, and Chinese. Of the 4,687 questionnaires collected, 4,489 were completed in English, 155 in Spanish, and 43 in Chinese.

Unless otherwise stated, the system-wide survey data presented in this report are from the 2024 Customer Satisfaction Study. The full 2024 BART Customer Satisfaction Study report is included in Appendix 9.

Ridership Survey Data: 2015 BART Station Profile Study

BART conducts an additional large survey of weekday passengers at every station approximately every five to ten years. This survey is designed to have a large enough sample size at each station to facilitate station-level analysis. It gathers data on trip origins and destinations, station access and egress modes, as well as passenger demographics. Data are used for modeling, access planning, and regulatory compliance. Data from the 2015 study directly informed BART's Ridership Model (BRM), which was used to establish station catchment areas based on home-station information collected through the survey. Station-level analysis, generally, makes use of the BRM.

While the most recent survey was conducted in 2024/2025, the data have not been finalized yet, so the 2015 data are used in this report where station-level data are. The 2015 survey was administered primarily via interviewers using tablet computers. Bilingual interviewers (primarily Spanish or Chinese) were present and print versions of the survey were available in English, Spanish, Chinese, Korean, and Vietnamese.

A total of 43,989 surveys were completed and processed, including 42,893 in English, 622 in Spanish, 281 in Chinese, 6 in Vietnamese, 1 in Korean, and 9 in other non-English languages. (The language in which the survey was conducted was undetermined for 177 surveys).

Unless otherwise stated, the station-level survey data presented in this report are from the 2015 Station Profile Survey. More details about this study, as well as additional data and maps, are available at [bart.gov/stationprofile](https://www.bart.gov/about/reports/profile). <https://www.bart.gov/about/reports/profile>

Station-level survey data are not available for five stations that have opened since the 2015 study: Warm Springs/South Fremont, Pittsburg Center, Antioch, Milpitas, and Berryessa/North San José. Placeholder data from adjacent stations have been used in this report until the updated survey data are available. In addition, SFO and OAK airport stations do not have home-based populations, so home-based trip data are not shown for these stations.

Demographic Maps and Charts

[Appendix 3](#) provides service area and ridership demographic profile maps and charts.

Minority and Non-Minority BART Lines and Stations

Chapter IV, Section 6.a. of Federal Transit Administration (FTA) Circular 4702.1b defines a minority transit route (or line) as one in which at least one-third of the line's revenue miles are located within areas where the percentage minority population exceeds the percentage minority population of the transit provider's service area. To make this determination, BART has calculated the minority and non-minority populations for the catchment areas for each of its stations using ACS 2019-2023 data.³ For the purposes of this report, the District used the 2019-2023 ACS data to determine the service area average of 68% as the 'minority' threshold.

Once the demographic composition of station catchment areas has been established, the next step in determining minority lines is to add up the revenue vehicle miles serving minority stations. The results are shown in Table 3, which documents the minority revenue-miles for each of BART's five lines and then compares it to the total revenue miles of those lines. Any line where more than one-third total revenue miles are considered minority is designated as a minority line.

As shown in Table 3, all BART lines are minority lines as their respective minority revenue miles (above BART's systemwide minority average) exceed one-third of their total revenue miles.⁴

³ The determination of which Census tracts are assigned to which BART stations was made in the development of the BART Ridership Model (BRM) and is based on the home origin of surveyed BART station users from BART's 2015 Station Profile Study. Please see the description in the Service Standards & Monitoring Section above for the methodology used for new stations.

⁴ The FTA Circular suggests that transit providers may supplement the Census determination of minority and non-minority lines with ridership survey data to see if a different demographic profile for a station's ridership exists. Staff completed this alternative analysis in Appendix 3 and found no difference in the minority line designations.

TABLE 3. MINORITY AND NON-MINORITY BART LINES, US CENSUS ACS 2019-2023

Line		Minority	Total	Minority Share of Revenue Miles	Line Determination
		Revenue Miles**	Revenue Miles**		
Green	Berryessa/North San José–Daly City	43.82	50.80	86.26%	Minority
Orange	Berryessa/North San José–Richmond	40.14	51.39	78.11%	Minority
Yellow	Antioch–SFO+Millbrae	28.83	57.27	50.33%	Non-minority
Red	Richmond– Millbrae+SFO	16.85	34.53	48.79%	Non-minority
Blue	Dublin/Pleasanton– Daly City	26.47	35.37	74.83%	Minority

* TRANSBAY TUBE WAS EXCLUDED.

** REVENUE MILE CALCULATIONS INCLUDE THE ORANGE AND GREEN LINE EXTENSIONS TO BERRYESSA, AND THE YELLOW LINE EXTENSION TO ANTIOCH.

*** THE YELLOW AND RED LINE WILL BE USED AS NON-MINORITY LINES FOR ALL DISPARATE IMPACT/DISPROPORTIONATE BURDEN TESTS, BECAUSE THEIR MINORITY SHARE OF REVENUE MILES FALLS BELOW THE REGIONAL AVERAGE.

TABLE 4. MINORITY BART STATIONS

(2019-2023 MINORITY POPULATION EXCEEDS 68%)

Coliseum
Richmond
South Hayward
Bay Fair
Hayward
Balboa Park
Fremont
Warm Springs*
Milpitas*
Berryessa/North San Jose*

Union City
San Leandro
South San Francisco
El Cerrito del Norte
Fruitvale
Pittsburg/Bay Point
Pittsburg Center*
Antioch*
Glen Park
Daly City
Lake Merritt

TABLE 4. NON-MINORITY BART STATIONS

(ACS 2019-2023 Minority Population is Less than 68%)

12th St. / Oakland City Center
Colma
Castro Valley
San Bruno
West Oakland
Millbrae
Powell St.
19th St. Oakland
West Dublin / Pleasanton
Dublin / Pleasanton
El Cerrito Plaza
MacArthur
Concord

North Concord / Martinez
Embarcadero
Civic Center / UN Plaza
Montgomery St.
24 th St. Mission
Downtown Berkeley
16th St. Mission
Ashby
Pleasant Hill / Contra Costa Centre
North Berkeley
Rockridge
Orinda
Walnut Creek
Lafayette

The process of assigning Census tracts to stations was based on the home origin stations provided by BART riders surveyed for the 2024 Station Profile Survey. Updated station profile survey information was not available at the time of the report. Where required, 2015 data is used for compliance reporting. The demographics data for these tracts were updated using the American Community Survey 2019-2023 5-year estimates. Note that BART's systemwide minority threshold increased from 65% to 68% based on the American Community Survey data.

Disparate Impact Test for 2023 – 2025

The BART Board of Directors approved a Disparate Impact and Disproportionate Burden Policy (DI/DB Policy) in 2013. The policy set thresholds for: across-the-board fare changes, fare type changes, major service changes, and new services and fares. These thresholds have been adapted to evaluate vehicle loads, vehicle headways, on-time performance, service availability, distribution of transit amenities, and vehicle assignment, as described below.

Based on the above analysis of ACS 2019–2023 data and BART's 2024 Station Profile Study, all BART lines meet the FTA's definition of 'minority' lines. In order to perform Disparate Impact/Disproportionate Burden tests

between lines, the Yellow line will be used as the comparison, non-minority line consistent with BART methodology, because it has the smallest proportion of minority revenue miles.

The new service lines—BART to Antioch and BART to Berryessa/North San José—either have limited data or use alternative technologies. The five (5) stations (Pittsburg Center, Antioch, Warm Springs/South Fremont, Milpitas, and Berryessa/North San José) were not open at the time of the 2015 survey, and therefore catchment areas based on survey data can't be created. As a proxy, data from the nearest station was applied. Once updated data is obtained via the ACS and a new Station Profile Study, staff will update the catchment information and classifications as necessary. BART to Antioch, including Pittsburg Center, was accounted for in the minority line determinations and staff have assigned minority status utilizing the Pittsburg/Bay Point station. Similarly, Warm Springs/South Fremont, Milpitas, and Berryessa/North San José were classified utilizing the catchment data of the Fremont station.

System-wide Service Monitoring

This section details BART's Service Standards and Policies, as well as the Monitoring Results. It is divided into six sections corresponding to the four standards and two policies established in Circular 4702.1B for service monitoring: Vehicle Load, Vehicle Headway, On-Time Performance, Service Availability, Distribution of Transit Amenities, and Vehicle Assignment. The methodology and standards developed for each of these metrics are described below and are consistent with the standards established in the 2019 Triennial Update unless otherwise noted. BART concludes that there no negative disparate impacts in the levels of service which it provides to minority communities.

Definitions

Line. For discussions of service, BART defines a "line" as a continuous service between discrete pairs of terminal locations. Many segments of BART's network are shared by multiple lines of service.

BART lines of service defined by map color are:

Line	Station Range
Green Line	Berryessa/North San José to Daly City
Orange Line	Berryessa/North San José to Richmond
Yellow Line	Antioch to San Francisco Airport (SFO)+Millbrae
Red Line	Richmond to Millbrae via San Francisco Airport (SFO)
Blue Line	Dublin/Pleasanton to Daly City
OAC	Oakland Airport to Coliseum

While most of BART's lines operate over the central 5'6"-gauge, third-rail electric network from terminal to terminal, we have some exceptions. The Yellow Line from just beyond Pittsburg/Bay Point to Antioch operates

on standard-gauge track with Diesel-electric multiple unit (DEMU) trains. Passengers transfer between the two systems at a platform located just beyond the Pittsburg/Bay Point station. From a service perspective the two operations are considered a single, continuous line of service. In addition, after Red Line service terminates, the Yellow Line continues from SFO to Millbrae, requiring the train operator to change ends within operation of the Line.

The Oakland Airport Connector/OAC uses automated guideway transit (AGT) technology to connect between the Coliseum station and the Oakland International Airport.

Minority Threshold. Using ACS 2019-2023 Census data, the percent of the population that is minority in BART's five-county (Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara) service area was determined to be 67.6%. Stations were designated as "minority" when the minority share of their station catchment area exceeded this percentage. Lines were designated "minority" when more than one-third of their revenue miles were considered minority revenue miles.

Peak Direction. While COVID has impacted both total ridership and travel patterns, 54% of weekday travel still occurs during peak periods. BART's morning peak period ridership is dominated by westbound service towards the center of the system in San Francisco and Oakland. In the evening a similar travel pattern occurs in the eastbound direction. The AM peak direction is, therefore, westbound while the PM peak direction is eastbound. One route, the Orange Line, does not cross the Bay, providing north – south service in the East Bay only. Its peak patterns differ from the other routes. In addition to connecting Berryessa and Richmond, it also serves as supplemental service to San Francisco-bound passengers between Richmond and Ashby as there is a timed transfer to Yellow Line trains serving San Francisco. Until 2025, The AM peak on the Orange Line has historically occurred in the northbound direction (peaking at Lake Merritt Station) until 2025 when southbound traffic exceeded northbound, occurring between Ashby and MacArthur Station. Similarly, in the PM peak direction northbound loads exceeded southbound loads for the first time, with peak loads occurring between MacArthur and Ashby Station.

Revenue Vehicle. A revenue vehicle is a single rail car used to transport paying passengers via BART's electric heavy rail, DEMU or AGT services.

Consist of. A consist is a group of rail cars coupled into a train. BART heavy rail cars are coupled most frequently as consists of 10, 9, 8, 6, 5, or 4 cars. Articulated DEMU vehicles operated in eBART service have two passenger compartments and are each defined as 2 cars by FTA. Coupled in consists of up to three DMUs, they comprise trains of 2, 4 or 6-cars. OAC trains are cable-driven sets of three integrally-connected, articulated passenger compartments, run independently as single consists.

Vehicle Headways Service Standard

In September 2023, BART adjusted schedules to better match service with changing post-covid ridership. Service shifted from 15-minute headways on weekdays and 30-min Saturday and Sunday service to base 20-

minute headways seven days a week. Hours of service saw slight adjustments with this change across all lines of service. Schedule changes made in 2023 were evaluated but did not meet the threshold for a Major Service Change.

Line	Route	FY23 (to 9/23)			Current (FY24 & Beyond)			Hours of service are based on trip
		M-F	Sat	Sun	M-F	Sat	Sun	
Green	Berryessa / Daly City	4:30 am to 7 pm	6 am to 6:30 pm	8 am to 6:30 pm	4:30 am to 7:30 pm	5:30 am to 7:30 pm	7:30 am to 7:30 pm	
Orange	Richmond / Berryessa	5 am to 12:30 am	6 am to 12:30 am	8 am to 12:30 am	5 am to 12:30 am	6 am to 12:30 am	8 am to 12:30 am	
Yellow	Antioch / SFO	4:30 am to 8:30 pm	5:30 am to 8:30 pm	7:30 am to 7 pm	4:30 am to midnight	6 am to midnight	7:30 am to midnight	
Yellow	Antioch / Millbrae via SFO	8:30 pm to midnight	8:30 pm to midnight	7 pm to midnight	7:30 pm to midnight^	7:30 pm to midnight^	7:30 pm to midnight^	
Red	Richmond / SFO via Millbrae	5 am to 8 pm	6 am to 7:30 pm	7:30 am to 7:30 pm	5 am to 9 pm	6 am to 9 pm	8 am to 9 pm	
Blue	Dublin / Daly City	4:30 am to 12:30 am	5:30 am to 12:30 am	7 am to 12:30 am	5 am to 1:00 am	6 am to 1:00 am	8 am to 1:00 am	
Shuttle^	SFO / Millbrae				9pm to midnight	9 pm to midnight	9 pm to midnight	
OAC	Coliseum / OAK	5 am to midnight	6 am to midnight	8 am to midnight	5 am to midnight	6 am to midnight	8 am to midnight	

^Millbrae-SFO Shuttle integrated into Red Line for all trips starting 3/21. After Red Line service, Yellow Line provided service between Millbrae and SFO until 1/25 when shuttle service was reinstated to allow for construction.

departure times.

Table 6. Hours of Service

Line	FY23 (to 9/23)				Current (FY24 & Beyond)		
	Peak Period	Midday	Evening	Saturday & Sunday	Weekday	Saturday & Sunday	7-days a week Evening
Green	15	15		30	20	20	0
Orange	15	15	30	30	20	20	20
Yellow	15	15	30	30	10	20	10
Red	15	15		30	20	20	0
Blue	15	15	30	30	20	20	20
Shuttle^							15
OAC	9	9	20*	9	9	9	20*

^Millbrae-SFO Shuttle integrated into Red Line for all trips starting 3/21. After Red Line service, Yellow Line provided service until 1/25 when shuttle reinstated to allow for construction.

* After 11 pm

TABLE 7. WEEKDAY AND WEEKEND HEADWAYS

In September 2023, BART shifted from 15-minute weekday service and 30 minute weekend service to provide 20 minutes service on all lines seven days a week. Additional service is provided on the Yellow Line between Pittsburg Bay/Point and SFO weekdays from start of service until 7:30pm⁵ to compensate for the fact that that segment of the network is the longest corridor with only one line of service and that peak period ridership is highest on that corridor.

In the core of the BART system, multiple lines operate over common segments and serve through the same stations. Stations in the core of the network therefore see more frequent trains than those in outlying parts of the system, as described in Table 7 above. Beyond these base levels, train lengths may be adjusted to refine the balance among passenger loadings across all lines. As shown in Table 7 Green and Red Line service terminate at 7 pm and 9pm respectively, reducing the composite headways on these lines. Weekday frequencies between MacArthur and 12th St are also impacted by the end of 10-minute Yellow Line service, making evening service the same across all days of the week. Orange and Yellow Line service are scheduled to allow for transfers between lines in the MacArthur to 12th St segment, operating two minutes apart southbound and in parallel northbound, significantly impacting actual average passenger evening wait times.

Table 7. Weekday and Weekend Headways

Line	FY23 (to 9/23)				Current (FY24 & Beyond)		
	Peak Period	Midday	Evening	Saturday & Sunday	Weekday	Saturday & Sunday	7-days a week Evening
Green	15	15		30	20	20	0
Orange	15	15	30	30	20	20	20
Yellow	15	15	30	30	10	20	10
Red	15	15		30	20	20	0
Blue	15	15	30	30	20	20	20
Shuttle [^]							15
OAC	9	9	20*	9	9	9	20*

[^]Millbrae-SFO Shuttle integrated into Red Line for all trips starting 3/21. After Red Line service, Yellow Line provided service until 1/25 when shuttle reinstated to allow for construction.

* After 11 pm

⁵ 9:30 pm until 1/25 when it shifted to 7:30pm.

TABLE 8. COMPOSITE HEADWAYS ON THE INTERIOR PART OF THE BART SYSTEM

(1/2025 SCHEDULE)

Line Section	Lines Serving Section	Weekday	Saturday & Sunday	7-days a week Evening
MacArthur to 12 th Street ³	Yellow Red* Orange	5 minutes (3-7 minutes)	6.67 minutes (3-12 minutes)	19 minutes (18-20 minutes)
Bay Fair to Lake Merritt	Green* Orange Blue	6.67 minutes (3-10 minutes)	6.67 minutes (3-10 minutes)	10 minutes (7-13 minutes)
West Oakland to Daly City	Yellow Red* Green* Blue	4 minutes (2-8 minutes)	5 minutes (2-10 minutes)	5 minutes (2-10 minutes)

TABLE 9. BRANCH HEADWAYS OF THE BART SYSTEM

(1/2025 SCHEDULE)

Line Section	Lines Serving Section	Weekday	Saturday & Sunday	7-days a week Evening
Hayward to Berryessa	Orange Green*	10 minutes (6-18 minutes)	10 minutes (6-18 minutes)	20 minutes
Castro Valley to West Dublin/Pleasanton	Blue	20 minutes	20 minutes	20 minutes
Rockridge to Pittsburg/ Bay Point	Yellow	10 minutes	20 minutes	20 minutes
Pittsburg/ Bay Point to Antioch	Yellow DMU	20 minutes	20 minutes	20 minutes

Ashby to Richmond	Orange Red*	10 minutes (8-12 minutes)	10 minutes (8-12 minutes)	10 minutes
Daly City to SFO	Yellow Red*	7 minutes (2-10 minutes)	10 minutes (8-12 minutes)	20 minutes
SFO to Millbrae	Red or Yellow	20 minutes (Red)	20 minutes (Red)	20 minutes (Yellow)

* No evening Red or Green Line service.

** After 11pm

Disparate Impact Test for Vehicle Headways

Using BART's DI/DB Policy as guidance, BART applies a 5% threshold to the analysis of its Vehicle Headways. A disparate impact on minority riders would exist when minority lines a different level of service provided by BART's base headways.

As of September 2023, frequencies on all BART lines are the same, except for the Yellow Line, which has 10-minute headways during weekdays. Of the five branches of the BART network, Rockridge to Pittsburg/Bay Point is the longest section that is served by only one line of service. The three branches listed in Table with 20-minute headways combined serve six of 50 total stations (12%) but make up only 6% of total ridership. It also has higher commute ridership than any other branch as illustrated by the loading analysis in the next section. Of the three, Pittsburg/ Bay Point to Antioch and SFO to Millbrae are served by lines defined as non-minority lines. Castro Valley to West Dublin/Pleasanton is served by the Blue Line, which ranks 3rd and 4th for Peak and Off-peak crowding respectively. Saturday and Sunday ridership trends are fairly similar with higher ridership on Saturdays vs Sundays. Sunday's lower ridership exacerbates the differential between minority and non-minority lines on Sundays, which are presented in Table 11.

TABLE 10. WEEKDAY PASSENGER FLOW

(AVERAGE OF APRIL/MAY FOR 2023-2025)

Line	Avg Daily Passenger Flow (both directions)	Weekday Headways	Base Train Length	Average Passengers per Train	Average Passengers per Car	Average Passenger Car Load by Stop*	Rank
Green	23,262	20 min	7.5	242	32	11.2	3
Orange	21,377	20 min	6.7	171	25	8.5	5
Yellow	63,600	10 min	8.5	339	40	12.6	1

Red	31,230	20 min	7.9	330	42	14.4	2
Blue	25,797	20 min	7.0	209	30	11.0	4
Total	33,053		7.6	264	35	11.5	
Minority Lines	70,436		7.0	204	29	10.1	
Non-Minority Lines	94,830		8.3	336	41	13.2	
% Difference Minority vs Non-Minority			-16%	-50%	-33%	-27%	

* Average Passenger Car Load by Stop is defined by the number of passengers on board at each stop the train makes. The same average daily passenger flow could have higher or lower average passenger loads by Stop depending on the number of stops each passenger rides for.

TABLE 11. SUNDAYS PASSENGER FLOW

Line	Avg Daily Passenger Flow (both directions)	Base Headways	Average Train Length	Average Passengers per Train	Average Passengers per Car		Average Passenger Car Load by Stop*	Rank
Green	10,196	20 min	7.1	163	23		7.4	3
Orange	10,501	20 min	6.6	112	17		6.0	5
Yellow	23,695	20 min	8.6	227	26		9.3	2
Red	15,518	20 min	7.3	245	34		11.5	1
Blue	12,595	20 min	6.7	142	21		7.4	4
Total	14,555		7.3	175	24	8.2		
Minority Lines	33,366		6.8	135	20	6.8		
Non-Minority Lines	39,554		8.2	233	29	10.1		
% Difference Minority vs Non-Minority			-19%	-56%	-36%	40 %		

* Average Passenger Car Load by Stop is defined by the number of passengers on board at each stop the train makes. The same average daily passenger flow could have higher or lower average passenger loads by Stop depending on the number of stops each passenger rides for.

Peak and Off-Peak Vehicle Headway Disparate Impact Test Results

All lines received scheduled service which matched BART's Peak and Off-Peak Headway standards. Passenger loading on minority lines relative to non-minority lines are lower during weekdays and weekends. While train lengths are shorter on minority lines compared to non-minority lines, both weekday and weekend service provide more service per passenger to minority lines as shown by the greater negative percent difference in passengers per service than base train length between minority and non-minority service.

Corrective Actions

No corrective actions are required.

Vehicle Load Service Standard

BART's vehicle load levels are measured at points on the system where trains are observed to carry the greatest number of passengers in a given direction during the three consecutive hours of greatest throughput for each line.

BART's highest loadings occur during its busiest three hours in the morning and in the afternoon. While ridership can change on a day-to-day basis, and the peak loads on the lines of service can occur over different three-hour periods, the AM Peak typically occurs between 7:00 AM and 10:00 AM, westbound from the East Bay towards Oakland and San Francisco. Since West Oakland is the station from which the highest loads depart in the morning (toward San Francisco), the peak period is calculated from when trains arrive at West Oakland. The PM peak occurs between 4:00 PM and 7:00 PM, eastbound from Oakland and San Francisco to the East Bay. AM and PM peak loads for all Transbay lines (Yellow, Green, Red, and Blue) occur between Embarcadero and West Oakland. Maximum loadings for the Orange Line, operating between Richmond and Berryessa, historically have occurred between 12th St. Oakland and Lake Merritt. In 2024 peak loading started shifting southward with the AM Peak between Fruitvale and Lake Merritt. In 2025 the AM Peak occurred between Coliseum and Fruitvale and the PM peak between Lake Merritt and Fruitvale.

Peak Period Peak Direction Vehicle Load Standard

BART's Vehicle Load standard is expressed in terms of the average number of seated and standing passengers per revenue vehicle (car), averaged over the length of a train.

The Transit Cooperative Research Programs (TCRP)'s "Transit Capacity and Quality of Service Manual" states that 5.4 square feet per standee (2 standees per square meter) represents a comfortable occupancy without body contact, reasonably easy circulation, and similar space allocation as that for seated passengers. BART has used this standard to set its Peak Vehicle Loading standard, which works out to 115 passengers per car (PPC) per train on average across for BART the combined populations of 'D' and 'E' cars. It is important to note that

historically during peak periods, per-car loadings on all lines have regularly exceeded this load standard, although BART hasn't come close to that since the Covid pandemic.

Off-Peak Vehicle Load Standard

During off-peak periods (early morning, midday, nights), BART aims to maximize seating utilization, while allowing for easy access for passengers with personal mobility devices, bicycles, and luggage. Consequently, the Off-Peak Vehicle Load standard is 85 passengers per car.

BART'S VEHICLE LOAD STANDARD

Period of Service	Load Standard
AM/PM Peak Period / Peak Direction	115 passengers per car
Off-Peak	85 passengers per car

Disparate Impact Test for Vehicle Load Levels

Guided by BART's Disparate Impact/Disproportionate Burden Policy (the DI/DB Policy), BART applies a 5% threshold to the analysis of its Vehicle Load Levels. During the six hours of daily Peak Periods, a disparate impact on minority passengers would exist when the average per-car passenger loadings on all minority lines in the peak direction is 5% greater, in aggregate, compared to non-minority lines. The same test applies for Off-Peak train runs.

Vehicle Load Service Monitoring

Actual data on Vehicle Load levels for each of BART's five lines was collected from samples taken between April and May on all weekdays. Prior to September 2023 (in Q1 of FY 24) all routes operated at 15 minute headways during the day. All lines operated with 10-car consists except the Orange Line, which operated with 8-car consists in order to ensure adequate passenger spacing to limit COVID-19 transmission. Starting in September 2023, in addition to significantly changing the schedule to 20-minute service seven days a week with 10-minute service on the Yellow Line during the day, loading standards returned to historic levels of 115 passengers per car during the peak and 85 passengers per car off-peak. Train lengths were reduced to 6-car consist on all lines, except for the Yellow Line where trains operated with 8-car consists. After an initial run with this schedule, specific peak trips on the Green, Red and Blue Lines were lengthened to 8-car consist to keep individual trips below the peak loading standard.

Peak Period-Peak Direction Disparate Impact Test Results

Table 6 below lists each of the five BART lines, using the Yellow and Red lines as BART's non-minority line for DI/DB calculation purposes. The table summarizes the PPC at the maximum loading point on each line for the six hours of daily peak period over the last three years. Peak vehicle loads include loads from morning westbound trips and evening eastbound trips only; reverse commute trips are considered off-peak. As defined

above, BART uses a Peak Period Vehicle Load Level of 115 passengers per car. Trains lengths vary based on line and time of day. Average Peak Vehicle Loads never exceeded the peak standard of 115 passengers per car on any line during any year of the evaluation.

TABLE 12. THREE YEAR SUMMARY OF PEAK VEHICLE LOAD LEVELS BY LINE

PEAK PERIOD STANDARD IS 115 PASSENGERS PER CAR

Line	Station Range	Minority	2023	2024	2025	3 year avg.	Rank
Green	Berryessa/North San José–Daly City	Yes	37.8	65.7	74.5	54.3	2
Orange	Berryessa/North San José–Richmond	Yes	20.1	34.7	37.7	28.9	5
Yellow	Antioch–SFO+Millbrae	No	65.5	61.3	69.2	65.2	1
Red	Richmond–Millbrae+SFO	No	38.7	53.4	74.5	51.5	4
Blue	Dublin/Pleasanton–Daly City	Yes	37.8	64.3	64.9	52.7	3
Minority Line			32.3	55.2	59.3	45.7	
Non-Minority Line			52.2	58.9	70.8	60.1	
Difference Minority vs. Non-Minority			-19.9	-3.8	-11.4	-14.5	
% Difference Minority vs. Non-Minority			-38%	-6%	-16%	-24%	

During the six hours of weekday Peak Periods, a disparate impact on minority passengers would exist when the average Vehicle Load Level in the Peak Direction is 5% greater in aggregate on all minority lines than it is on non-minority lines and exceeds the 115 PPC Peak Period Vehicle Load standard. As noted in Table 6, over the past three years the average vehicle load level in the Peak Direction was 24% lower on BART's minority lines than its non-minority lines. At an average of 46, the peak passenger load per car was well below the Peak Vehicle Load standard for minority lines.

Off-Peak Period (and Reverse Commute Direction during the Peak Period) Disparate Impact Test Results

A similar calculation of Vehicle Load Levels was conducted with April/May sample data for Off-Peak trips. The results of this analysis are shown in Table 7 below:

TABLE 13. THREE YEAR SUMMARY OF OFF-PEAK VEHICLE LOAD LEVELS BY LINE

OFF-PEAK PERIOD STANDARD IS 85 PASSENGERS PER CAR

Line	Station Range	Minority	2023	2024	2025	3 year avg.	Rank
Green	Berryessa/North San José– Daly City		13.9	24.4	27.7	20.0	3
Orange	Berryessa/North San José– Richmond		11.9	18.3	19.0	15.7	5
Yellow	Antioch–SFO+Millbrae		24.1	23.9	26.9	25.0	1
Red	Richmond–Millbrae+SFO		18.4	24.5	37.3	24.7	2
Blue	Dublin/Pleasanton–Daly City		13.6	21.7	23.2	18.6	4
Minority Line			13.2	21.2	22.9	18.0	
Non-Minority Line			21.5	24.0	29.6	24.9	
Difference Minority vs. Non-Minority			-8.4	-2.8	-6.7	-6.9	
% Difference Minority vs. Non-Minority			-64%	-13%	-29%	-38%	

Applying the same DI/DB test for Off-Peak train runs, a disparate impact on minority passengers would exist when the average Vehicle Load Level is 5% greater in aggregate on all minority lines than it is on non-minority lines and exceeds the 85 passenger per car standard. As shown in Table 7, Off-Peak vehicle load levels for minority lines was 18 passengers per car compared to 25 passengers per car on non-minority lines, a -38% difference. In addition, no line exceeded BART's 85 PPC Off-Peak Load standard.

No negative disparate impact on minority lines exists because the disparate impact was beneficial to the minority line.

Corrective Actions

No corrective actions are needed to address overall Peak and Off-Peak Vehicle Load Levels.

On-Time Performance Service Standard

BART measures on-time performance in two ways: Train On-Time and Customer On-Time. Train On-Time is a measure of train runs completed as scheduled. It is measured as the percentage of scheduled runs that dispatch from the proper start station, provide service at all stations along planned routes without any run-throughs, and finish at the planned end station no more than 5 minutes after the scheduled arrival time. The Train On-Time Goals stayed steady for 2023-2025 at 91%. Customer On-Time measures when a passenger

arrives at their station relative to their scheduled arrival time. It is measured as the percentage of riders who arrive at their destination station neither one minute before, nor five minutes after, the scheduled arrival time for their respective stations. For 2023-2025, the Customer On-Time goal stayed steady at 94%.

BART tracks monthly and annual On-Time performance against these two metrics for system-wide performance. BART has historically tracked Train On-Time performance, shown in Table 15. Starting in 2023, BART now has the capacity to store and analyze passenger on-time performance in more detail including by Line as illustrated in Error! Reference source not found.. Table 14 below presents the On-Time Performance relative to the goals for each year.

Disparate Impact Test for On-Time Performance

Guided by BART's DI/DB Policy, BART applies a 5% threshold to the analysis of its On-Time Performance. A disparate impact on minority riders exists when the average aggregate Train On-Time Performance for minority lines is 5% below the average aggregate for non-minority lines and does not meet BART's On-Time Performance goals. Given that Customer On-Time performance is not evaluated on a line-by-line basis, there is no disparate impact test for customer on-time performance.

On-Time Performance Service Monitoring

System-wide On-Time Performance goals and actual performance results for each year are documented in Table 10 below. BART struggled with a number of challenges between 2023 and 2025 and did not meet its Train On-Time Performance or Customer On-Time Performance goals during any of the last three years.

TABLE 14. THREE YEAR SYSTEM-WIDE ON-TIME PERFORMANCE

Fiscal Year	Customer On-Time		Train On-Time	
	Actual	Goal	Actual	Goal
2023	87%	94%	67%	91%
2024	91%	94%	76%	91%
2025	88%	94%	70%	91%

Train On-Time Performance results shown in Table 154 are based on data from Fiscal Year 2023-2025. While no lines were able to achieve BART's 91% train on time standard, the Yellow Line had the lowest average Train On-Time performance (67%) over the three-year period and the Blue Line the highest at 75%.

Customer On-Time Performance results shown in Error! Reference source not found. are based on data from Fiscal Year 2023-2025. While no lines were able to achieve BART's 94% train on time standard, the Orange Line had the lowest average Train On-Time performance (87%) over the three-year period and the Blue Line the highest at 91%

It should be noted that the Orange Line schedule is coordinated to hold to allow customers Orange Line customers between Richmond-Ashby to transfer to Yellow Line San Francisco trains. The Orange Line Passenger On-Time performance is worst in the evenings when those trains hold for Yellow Line trains from San Francisco to allow those customers more options to head north toward Richmond. Customers originating on both the Yellow and Orange (or Blue) Line trains exiting between Richmond and Ashby are included as Orange Line customers for purposes on Passenger On-Time. The Orange Line waiting for the lowest On-Time performance Yellow line may lower Orange Line On-Time performance overall.

TABLE 15. TRAIN ON-TIME PERFORMANCE BY LINE

Line	Fiscal Year 2023	Fiscal Year 2024	Fiscal Year 2025	Average	Rank
Green	67%	77%	69%	71%	3
Orange	68%	76%	69%	71%	3
Yellow	59%	71%	69%	67%	5
Red	73%	80%	71%	74%	2
Blue	71%	77%	76%	75%	1
Average	67%	76%	70%	71%	
Minority Lines	69%	77%	71%	72%	
Non-Minority Lines	65%	74%	69%	70%	
% Difference Minority vs Non-Minority	4%	2%	2%	3%	

Train On-Time Performance Disparate Impact Test Results

As noted in **Table 15** above, the non-minority Yellow Line had the lowest on-time performance on the system. Combined, minority lines had better on-time performance than the non-minority lines by approximately 3%. For passenger on-time performance, the difference between minority and non-minority lines varies up to 1% per year.

The Disparate Impact Test for this standard is that minority lines, in the aggregate, both perform no lower than the system-wide standard and no more than 5% lower than non-minority lines. BART's minority lines' aggregate on-time performance is better than BART's non-minority lines and does not exceed the 5% threshold. While the minority lines' performance in aggregate are below BART's On-Time Performance goal of 91%, both provisions of the test must be met for a disparate impact to be found. Similarly for Passenger On-Time Performance, while BART falls below the goal of 94% on-time for all customers, the difference between minority and non-minority lines never exceeds 1%, falling below the 5% discrepancy threshold. BART is working to resolve its on-time performance issues through on-going track maintenance, a new operations control center, and ongoing replacement of the legacy revenue fleet with new rail cars.

Corrective Actions

No corrective actions are required.

Service Availability Service Standard

BART's service area includes all census tracts in the five counties which it currently serves (Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara). In addition to passenger fares, BART is largely funded

through sales tax and property tax levies imposed in BART District counties (Alameda, Contra Costa, and San Francisco). San Mateo and Santa Clara counties are not members of the BART District. San Mateo County contributes to BART operations within the county's boundaries through a county-wide sales tax. Santa Clara county, via Valley Transportation Authority (VTA), contributes to BART operations through a direct payment for net operating expenses.

BART's Service Availability can be represented by the distribution of its 5 lines and 48 stations across this five-county service area. To develop a quantitative measure of this distribution, BART calculates the linear distance in miles from the population-centroid of each Census tract within these five-counties to their nearest BART station.

Disparate Impact Test for Service Availability

Using as guidance BART's DI/DB Policy, BART applies a 5% threshold to the analysis of its Service Availability. A disparate impact on minority riders exists when minority Census tracts have, on average, a 5% greater linear distance to their nearest BART station than non-minority Census tracts.

TABLE 16. TRAVEL DISTANCE TO NEAREST BART STATION

Category	Number of Census Tracts	Linear Distance to BART (Miles)
Minority Census Tracts	716	3.42
Non-Minority Census Tracts	723	4.89
% Difference Minority vs. Non-Minority		-30.01%

Service Availability Disparate Impact Test Results

A disparate impact on minority riders exists when minority Census tracts have, on average, a 5% greater linear distance to their nearest BART station compared to non-minority Census tracts. Because the average travel distance from minority Census tracts to the nearest BART station is approximately 30% shorter than that from non-minority Census tracts, there is no disparate impact in BART's Service Availability.

Corrective Actions

No corrective actions are required.

Distribution of Transit Amenities Service Policy

Except as noted below or otherwise precluded by station design considerations, the following amenities shall be distributed equitably across all stations on the BART system, and generally be in proportion to each station's ridership:

- Customer Information Services (a combination of time tables, public address systems, digital information systems, and station agents, in proportion to ridership, station size, and passenger flow density)
- Restrooms (where appropriate given the security needs of BART patrons and the BART system)
- Platform Area Benches
- Trash Receptacles
- Route Maps
- Arrival Information Systems
- Automated Fare Collection Equipment (Ticket and Clipper Vending Machines, Add fares, and Change Machines)
- Emergency (Courtesy) Telephones
- Elevators and Escalators
- Parking Spaces (unless otherwise limited by local geographic, planning, and funding considerations)
- Bicycle Parking and Storage
- Bus Access Facilities (where space is available on BART station property and service is provided by local bus operators)

BART's Service Monitoring Procedure furthermore describes the following methods for analyzing the equity of the distribution of these Transit Amenities:

- BART will produce an inventory of the availability of the following amenities at each of its heavy rail stations (currently 48): customer information services, restrooms, benches, trash receptacles, route maps, timetables, informative publications, arrival information displays, ticket vending machines, change machines, emergency (or courtesy) telephones, elevators, escalators, parking facilities, and bicycle and bus access facilities (where appropriate).
- BART will identify a number of station pairs which have similar ridership levels and locations along the BART system (urban or suburban). One station in each pair will be a minority station and the other will not. The station pairs could, by illustration, include: two low volume suburban stations, two high volume suburban stations, two urban fringe stations, et al.
- BART will provide a detailed description of each station pair and will then conduct a comparison of the station amenities available.

BART determines whether each of its stations serves a predominantly minority population by comparing the station's catchment area demographics to District's service area minority threshold of 68% (ACS 2019-2023), summarized in Table 17.

TABLE 17. MINORITY STATUS BY STATION CATCHMENT AREA

(AMERICAN COMMUNITY SURVEY 2019-2023)

Station	% Minority	% White
Coliseum	89%	11%
Richmond	87%	13%
South Hayward	84%	16%
Bay Fair	83%	17%
Hayward	83%	17%
Balboa Park	83%	17%
Fremont	82%	18%
Warm Springs*	82%	18%
Milpitas*	82%	18%
Berryessa / North San Jose*	82%	18%
Union City	80%	20%
San Leandro	78%	22%
South San Francisco	76%	24%
El Cerrito del Norte	76%	24%
Fruitvale	74%	26%
Pittsburg / Bay Point	72%	28%
Pittsburg Center*	72%	28%
Antioch*	72%	28%
Glen Park	72%	28%
Daly City	72%	28%
Lake Merritt	69%	31%
12th St. / Oakland City Center	67%	33%
Colma	66%	34%
Castro Valley	65%	35%
San Bruno	65%	35%
West Oakland	65%	35%
Millbrae	62%	38%
Powell St.	61%	39%

Station	% Minority	% White
19th St. Oakland	61%	39%
West Dublin / Pleasanton	60%	40%
Dublin / Pleasanton	60%	40%
El Cerrito Plaza	60%	40%
MacArthur	57%	43%
Concord	57%	43%
North Concord / Martinez	57%	43%
Embarcadero	57%	43%
Civic Center / UN Plaza	57%	43%
Montgomery St.	56%	44%
24th St. Mission	54%	46%
Downtown Berkeley	54%	46%
16th St. Mission	53%	47%
Ashby	53%	47%
<i>Pleasant Hill / Contra Costa Centre</i>	47%	53%
<i>North Berkeley</i>	45%	55%
Rockridge	43%	57%
Orinda	43%	57%
Walnut Creek	38%	62%
Lafayette	34%	66%
Total Five-County Average	68%	32%

* The five stations in italics were not open at the time of the 2015 survey, and therefore catchment areas based on survey data can't be created. As a proxy, the percentages from the nearest station were applied.

This table shows the minority and non-minority percentages within a station's catchment area using tract-level data from ACS 2019-2023. Trip origin data from BART's 2015 Station Profile Study were used to define a station's catchment area using Census tracts within the five-county area. Stations where the minority percentages exceed the five-county average of 68% are highlighted.

Including the five newer stations where minority percentages were estimated, BART has 21 stations which can be categorized as minority stations. Disparate Impact Test for Station Amenities

A disparate impact on minority riders would exist when, considering station design limitations, the majority of minority stations sampled have fewer transit amenities than non-minority stations in a majority of the amenity categories evaluated. BART has 24 amenity categories included in this analysis, so a disparate impact would exist if the minority stations had fewer amenities than non-minority stations in 13 or more categories.

Station Amenities Service Monitoring – Analysis of Station Pairs

Any methodology for comparing transit amenities between the 50 stations in the BART system will have shortcomings as no two BART stations are identical. Built over a span of approximately 40 years, they were designed by different architects to fit into different sites and to serve different topographic and community conditions.

Methodology

In accordance with the Service Monitoring Procedures, BART has attempted to conduct a meaningful comparison of transit amenities by identifying eight station pairs with similar ridership levels and locations along the BART system (urban or suburban). One station in each pair is a minority station and the other is not.

TABLE 18. BART STATION PAIRS FOR TRANSIT AMENITIES ANALYSIS

Pair #	Minority Station	Non-Minority Station
1	San Leandro	Rockridge
2	Bay Fair	Walnut Creek
3	Union City	El Cerrito Plaza
4	South Hayward	Orinda
5	South San Francisco	Lafayette
6	Pittsburg/Bay Point	Concord
7	Hayward	North Berkeley
8	Lake Merritt	Downtown Berkeley

Twenty-four amenity categories were analyzed for each station pair. In order to compare amenities between minority and non-minority stations, the analysis of each station pair tabulates the number of categories in which the minority station has fewer transit amenities than the non-minority station. A disparate impact exists

when, considering certain limitations, minority stations have fewer amenities than non-minority stations in a majority (at least 9 out of 24) of the categories evaluated.

Findings

As shown in Table 19 below, there were no cases among the eight station pairs analyzed where minority stations had fewer transit amenities than non-minority stations in more than 9 of the 24 Transit Amenity Categories. For detailed results of the Station Pair Analysis, see Appendix 11.

TABLE 19. RESULTS SUMMARY OF STATION PAIRS ANALYSIS

Station Pair	Minority Station	Non-Minority Station	# of Categories with Fewer Amenities at Minority Station
1	San Leandro	Rockridge	4
2	Bay Fair	Walnut Creek	6
3	Union City	El Cerrito Plaza	3
4	South Hayward	Orinda	3
5	South San Francisco	Lafayette	4
6	Pittsburg/Bay Point	Concord	7
7	Hayward	North Berkeley	4
8	Lake Merritt	Downtown Berkeley	2
Average	Minority	Non-Minority	4.12

Some variances may appear to favor some stations, particularly for escalators/elevators, parking spaces, bicycle spaces, and bicycle lockers. However, upon closer examination, the variances were proportionate to each station's ridership needs attributable to station location or design considerations. These variances are described below.

Escalator/Elevator Amenities

Some stations have more elevators/escalators because of station design constraints. Center platform stations, which constitute about half of the District's non-subway stations, will generally require a single elevator and often a single escalator to serve their passenger demand. Side platform stations have two platforms, one serving the inbound direction and one serving the outbound directions, flanking a double trackway in the

center of the station. These stations will generally require two escalators and two elevators (one set for each platform) to serve their passengers.

Parking Space Amenities

BART's 36 parking facilities at stations vary in terms of type of parking facility (i.e. garage, lot, or on-street curb) and number of spaces. The variance in the number of parking spaces among stations is due to the station location and design considerations, funding constraints, and varying demand for parking by station.

In June 2016, the BART Board adopted the Station Access Policy (<http://www.bart.gov/about/planning/station-access/policy>) that guides access practices and investments through 2025. A station typology was developed as part of this policy, where stations were categorized as auto dependent (with more auto mode share), intermodal – auto reliant, balanced intermodal, urban with parking, and urban (with less auto mode share). Stations that are auto dependent, such as Dublin/Pleasanton, generally have a greater number of parking spaces than stations that are urban with parking, such as Ashby.

Bicycle Spaces and Lockers

Another amenity category where measurable variation exists is for bicycle parking. In most cases, negative variances in bike racks and lockers are the result of riders' access mode to the station. The San Leandro (minority)/Rockridge (non-minority) and the 12th St. (minority)/Downtown Berkeley (non-minority) station comparisons are examples. As documented in BART's Bike Program Capital Plan (June 2017), bicycle parking is allocated to stations based on the current and projected demand for such facilities. The availability of local funding can influence the type and quantity of bicycle parking at individual stations. As such, bicycle parking facilities are generally more robust at stations where demand is strong.

Station Amenities Disparate Impact Test Results

A disparate impact on minority riders would exist when, considering the limitations identified above, the majority of minority stations sampled have fewer transit amenities than non-minority stations in a majority of the amenity categories evaluated. There was not a single case out of the 8 station pairs analyzed in this report where a non-minority station had more amenities than a minority station in a majority (13) of the 24 categories. Accordingly, BART finds that Transit Amenities at its stations are distributed equitably and consistent with the District's standards for station amenity distribution.

Corrective Actions

No corrective actions are required.

Vehicle Assignment Service Policy

A homogeneous fleet of revenue cars, designated 'D' (control cab) and 'E' (non-control), are operated on the main (5'6" gauge, third rail) BART network, having replaced the legacy fleet of 'A', 'B' and 'C' cars. The D and E cars all have similar performance characteristics, amenities, and interior space. Starting in 2018, the first of these

cars, called the 'Fleet of the Future' (FOTF), began to be delivered and placed in service, replacing the older 'A', 'B', and 'C' cars.

Legacy cars were operated in revenue service for the last time in September of 2023; enabling BART to provide uniform service, undifferentiated by types of vehicles, for the life of the D and E car fleet. Maintenance requirements and differences in the number of trains used per line made it challenging to maintain equitable distribution of the new and old trains throughout the service, with the percent of FOTF on a given line at a given time may have varied as much by as much as 85%, efforts were made to adjust balance the availability of FOTF on each line over time. Overall, Minority Lines had a higher percent of new FOTF trains than non-minority lines in FY23 and there was an equal distribution in FY24 before all of the old trains were replaced.

TABLE 20. DISTRIBUTION OF FLEET OF THE FUTURE VEHICLES

Line	2023	2024 through 9/11/23	Weighted Average	Rank
Green	37%	44%	38%	4
Orange	69%	75%	70%	1
Yellow	59%	86%	63%	2
Red	46%	47%	46%	5
Blue	58%	89%	62%	3
Average	54%	73%	57%	
Minority Lines	54%	71%	57%	
Non-Minority Lines	52%	71%	55%	
% Difference Minority vs Non-Minority	2%	1%	2%	

APPENDIX