

CENTRAL CONTRA COSTA TRANSIT AUTHORITY

# Title VI Program Report

Adopted October 21, 2021

*County Connection*

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Concord, CA 94520

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# I. INTRODUCTION

This County Connection Title VI Program Report provides policies, procedures, and data analysis to comply with guidelines issued by the Federal Transit Administration of the US Department of Transportation to implement Title VI of the 1964 Civil Rights Act regarding transit services and related benefits. The purpose of Title VI is "to assure that no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Since 1972, the FTA has required applicants for and recipients of Federal assistance to provide assessments of compliance as part of the grant approval process. The FTA has the responsibility to ensure that federally supported transit services and related benefits are distributed in a manner consistent with Title VI including as related to Environmental Justice and access for individuals who have Limited English Proficiency. This update conforms to the FTA's Title VI Circular 4702.1B, effective October 2012.

As a federal grant recipient, County Connection is required to maintain and provide to FTA information on its compliance with the Title VI regulations. County Connection is required to perform a self-assessment every three years and to document that services and benefits are provided in a non-discriminatory manner. This covers the period from 2019 through 2021.

County Connection, as required under Circular 4702.1B, has included the following information in this program report:

1. Discussion and attachments pertaining to general Title VI requirements.
  - A. Title VI Notice to Public
  - B. Title VI Complaint Procedures
  - C. List of Investigations, Complaints, or Lawsuits
  - D. Public Participation Plan
  - E. Language Assistance Plan
  - F. Membership of Non-elected Committees
  - G. Sub-recipient Monitoring
  - H. Board Approval of Title VI Program



- I. Construction Projects
- J. Additional Information Upon Request
- 2. Discussion and attachments pertaining to Title VI requirements for transit operators.
  - A. Service Standards and Policies
  - B. Demographic and Service Profile
  - C. Demographic Ridership and Travel Patterns
  - D. Monitoring Program Results
  - E. Public Engagement for Policy Development
  - F. Title VI Equity Analyses
- 3. All other required submittals.

## II. GENERAL REQUIREMENTS

This chapter responds to the general reporting information required of all FTA grantees on a triennial basis. The information is required under U.S. Department of Transportation (DOT) regulations.

### A. Title VI Notice to Public

A copy of County Connection's notice to the public that it complies with Title VI is contained in Appendix A.

### B. Title VI Complaint Procedures & Form

County Connection responds to any lawsuits or complaints that allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. County Connection makes its procedures for filing a complaint available to members of the public. Copies of County Connection's Title VI complaint process, consumer reports / investigation process overview and Title VI complaint form are contained in Appendix B.

### C. List of Investigations, Complaints, or Lawsuits

County Connection received no Title VI complaints during the review period. Additionally, there have been no Title VI lawsuits filed against County Connection.

### D. Public Participation Plan

A summary of public outreach and involvement activities undertaken in the last three years, and a description of steps taken to ensure that minority and low-income persons had meaningful access to these activities is contained in various portions of this Program Report, including the County Connection's Public Participation Plan in Appendix C and the LEP Plan in Appendix D.

### E. Language Assistance Plan

The County Connection's current Language Assistance Plan for providing language assistance for persons with Limited English Proficiency based on the DOT LEP Guidance is contained in Appendix D.

## **F. Membership of Non-Elected Committees**

County Connection approves (but does not make) appointments to one non-elected committee: the County Connection Advisory Committee. The Advisory Committee is composed of 11 representatives—one from each member jurisdiction of County Connection—to serve in an advisory capacity to the County Connection Board of Directors. Five seats are currently filled, and six are vacant. Responsibilities include providing input on the needs of current and potential fixed-route and paratransit users. The Advisory Committee has contact with the Board of Directors and assists them in any manner the Board deems appropriate.

The purpose of the Advisory Committee is to help County Connection plan a transportation system that is safe, efficient, cost-effective, energy efficient, environmentally responsible, and responsive to the needs of the broadest range of citizens and transit users in Central Contra Costa County. The focus of the Advisory Committee is on issues of direct concern to users of fixed-route bus and accessible services.

The Advisory Committee meets on the second Tuesday every other month at 2:00 p.m. in the County Connection Board Room, 2477 Arnold Industrial Way in Concord. All meetings are open to the public.

The eleven members are appointed for two-year terms, representing and divided among the following constituencies:

- Bus Riders – Representing the diverse population of both Central Contra Costa County and County Connection’s fixed-route and paratransit ridership.
- Community – Representing community interests which also interact with County Connection fixed-route and paratransit services.

The member jurisdictions of County Connection are responsible for the recruitment, selection, and appointment of representatives to the Advisory Committee. Once the jurisdictional governing body appoints a member to the Advisory Committee, responsibility then falls to County Connection’s Board of Directors to approve the appointment. When County Connection learns of impending vacancies, staff requests that the appointing jurisdictions encourage participation by diverse community members.

**G. Sub-recipient Monitoring**

County Connection has no sub-recipients.

**H. Board Approval of Title VI Program**

The County Connection Board of Directors reviewed and approved the 2021 Title VI Program on October 21, 2021. The associated resolution is included in Appendix E.

**I. Construction Projects**

County Connection has not undertaken any significant construction projects during this reporting period. For any construction projects that require documentation under Title VI Circular 4702.1B, an environmental justice analysis will be prepared and submitted separately as allowed under the circular.

**J. Additional Information Upon Request**

At the discretion of FTA, information other than that required by the circular may be requested. FTA has not requested such information, and none has been provided at this time.

## III. REQUIREMENTS OF TRANSIT OPERATORS

This chapter responds to the specific reporting information required of all transit operators who are FTA grantees on a triennial basis. The information is required under DOT regulations.

### A. Title VI Policies

A copy of County Connection's Major Service Change, Disparate Impact and Disproportionate Burden Policies adopted in June 2013, and System-Wide Service Standards and Policies adopted in December 2014, can be found in Appendix F.

### B. Demographic and Service Profile

County Connection regularly evaluates demographic information as part of any proposed service or fare change, as required by the FTA. In addition, County Connection conducted additional analysis for this Program submission using Census Block Group data from the 2015-2019 American Community Survey (ACS) 5-year estimates. The results are included in Appendix G.

### C. Demographic Ridership and Travel Patterns

County Connection conducts statistically valid samples of passengers every three years. The survey questions include queries regarding race/ethnicity and household income, among many others. A copy of the County Connection 2019 On-Board Survey by ETC Institute is contained in Appendix H.

### D. Monitoring Program Results

The results of County Connection's most recent analysis of service provision versus the System-Wide Service Standards and Policies adopted in December 2014 can be found in Appendix I.

### E. Public Engagement for Policy Development

A summary of the public engagement process utilized to develop and vet County Connection's Major Service Change, Disparate Impact and Disproportionate Burden Policies can be found in Appendix J.

### F. Title VI Equity Analyses

County Connection conducted equity analyses during the review period. All equity analyses revealed the proposed service or fare changes would have no disparate impact and impose no

disproportionate burden findings on protected communities. Complete copies of the equity analyses conducted during the review period are included in Appendix K.

## A. TITLE VI STATEMENT OF POLICY

The County Connection Notice to the Public regarding Title VI rights is included below. It is posted at several highly visible locations around County Connection's Administrative headquarters at 2477 Arnold Industrial Way, Concord, CA, 94520, and on the County Connection website in all nine "Safe Harbor" languages identified in the Language Assistance Plan. In addition, cards with the English notice are on all County Connection fixed-route vehicles.

### Title VI Statement of Policy

The Central Contra Costa Transit Authority (County Connection) grants equal access to its transportation services in Central Contra Costa. County Connection is committed to a policy of nondiscrimination in the conduct of its business, including its responsibilities under Title VI of the Civil Rights Act of 1964, which provides that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit services delivery. For information on the County Connection Title VI Program, visit [countyconnection.com](http://countyconnection.com) or call 925-676-7500 (TTY 711).

Any person who believes they have been discriminated against based on race, color or national origin with regard to transit services delivery has the right to file a complaint within 180 days of the alleged incident. You may download a complaint form below or request one by calling 925-676-7500 (TTY 711). A complainant may also file a complaint with the Federal Transit Administration through its Office of Civil Rights: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, contact 925-676-7500.

### Translations

#### Spanish

El Central Contra Costa Transit Authority (County Connection) concede a todos los ciudadanos igual acceso a sus servicios de transporte en Central Contra Costa. County Connection está comprometido con una política de no discriminación en la conducción de sus negocios, incluyendo sus responsabilidades bajo el Título VI de la ley de derechos civiles de 1964 que no establece que ninguna persona, por motivos de raza, color u origen nacional, excluida de la participación en, ser negado los beneficios de o ser objeto de discriminación bajo su programa de prestación de servicios

de tránsito. Para obtener información sobre el Programa del Título VI de County Connection, visite [countyconnection.com](http://countyconnection.com) o llame al 925-676-7500 (TTY 711).

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional con respecto a la prestación de servicios de tránsito tiene derecho a presentar una queja dentro de los 180 días posteriores al presunto incidente. Puede obtener un formulario de queja a continuación o solicitar uno llamando a 925-676-7500 (TTY 711). Un demandante puede presentar una queja directamente con el tránsito Federal Administración por archivar una queja con la oficina de derechos civiles, Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si necesita información en otro idioma, comuníquese con 925-676-7500.

#### Chinese

中部 Contra Costa 交通局 (County Connection) 同意其在中部康特拉科斯塔縣(Central Contra Costa )的交通服務的平等使用權。County Connection 致力於在開展業務時實行非歧視政策，包括 1964 年《民權法》第六篇規定的責任，其規定，任何人不會因種族、膚色或原國籍的原因，在接受公共交通服務計劃中，被排除參與、被拒絕獲益或受到歧視。有關 County Connection 第六篇計劃的信息，請查閱網站 [countyconnection.com](http://countyconnection.com) 或致電 925-676-7500 (TTY 致電 711)。

任何人如果認為自己在使用公共交通服務方面因種族、膚色或原國籍受到歧視，都有權在指稱事件發生後 180 天內提出投訴。您可以下載下面的投訴表或致電 925-676-7500 (TTY 致電 711) 索取投訴表。投訴人可將投訴直接提交至聯邦交通管理局 (Federal Transit Administration)，具體做法是將投訴提交至公民權利辦公室 (Office of Civil Rights)：Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590。

如需其他語言的信息，請致電 925-676-7500。

#### Korean

Central Contra Costa Transit Authority (County Connection)는 Central Contra Costa 의 운송 서비스에 대한 동등한 접근 권한을 부여합니다. County Connection 은 1964 년 민권법 Title VI 에 의거한 책임을 포함하여 사업 수행에 있어 대중 교통 서비스 제공 프로그램에 참여하지 못하거나,



혜택을 받지 못하거나 차별을 두지 않는다는 정책에 전념하고 있습니다. County Connection 타이틀 VI 프로그램에 대한 정보는 [countyconnection.com](http://countyconnection.com) 을 방문하거나 925-676-7500(TTY 711)으로 전화하십시오.

대중 교통 서비스 제공과 관련하여 인종, 피부색 또는 출신 국가에 따라 차별을 받았다고 생각하는 사람은 사건 발생 후 180 일 이내에 불만을 제기할 권리가 있습니다. 아래에서 불만 사항 양식을 다운로드하거나 925-676-7500(TTY 711)으로 전화하여 요청할 수 있습니다. 고발자는 인권 사무국을 통해 연방 교통국에 직접 고발사항을 접수할 수 있습니다. 접수 주소는 다음과 같습니다. Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

다른 언어로 된 정보가 필요하시면 925-676-7500 번으로 문의하십시오.

#### Farsi

سنترل کونتر کوستا ترانزیت اتوریته (کونتی کنیکشن) دسترسی مساوی به خدمات حمل و نقل خود در سنترل کونتر کوستا اعطا میکند. کونتی کنیکشن متعهد به یک پالیسی عدم تبعیض در انجام امور تجارت خود است، از جمله مسئولیت های خود تحت عنوان VI قانون حقوق مدنی سال 1964 (Title VI of the Civil Rights Act of 1964)، که فراهم می دارد هیچکس نباید، به دلیل نژاد، رنگ یا مبدای ملی از مشارکت محروم شود، از مزایای آن انکار شود یا مورد تبعیض تحت برنامه ارائه خدمات حمل و نقل خود قرار می گیرد حذف نمی شود. تحت مشارکت، محرومیت از مزایای، یا تحت تبعیض تحت برنامه ارائه خدمات حمل و نقل خود قرار می گیرد. برای اطلاعات بر کونتی کنیکشن در مورد برنامه عنوان VI، به سایت [countyconnection.com](http://countyconnection.com) دیدن کنید یا به این شماره 925-676-7500 (TTY 711) زنگ بزنید.

هر شخصی که معتقد است بر اساس نژاد، رنگ یا مبدای ملی در ارتباط با ارائه خدمات ترانزیت مورد تبعیض قرار گرفته است، میتواند به ظرف 180 روز از حادثه ادعایی شکایت کند. شما میتوانید فرم شکایت را در زیر بارگیری کرده یا با شماره 925-676-7500 (TTY 711) درخواست کنید. شاکی همچنین میتواند از طریق اداره حمل و نقل فدرال: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

اگر اطلاعات به زبانی دیگر مورد نیاز است، با شماره 925-676-7500 تماس بگیرید.

Tagalog

Nagkakaloob ang Central Contra Costa Transit Authority (County Connection) ng pantay-pantay na paggamit sa mga serbisyo ng transportasyon nito sa Central Contra Costa. Nakatalaga ang County Connection sa isang polisiya ng walang diskriminasyon sa pagsasagawa ng trabaho nito, kabilang ang mga responsibilidad nito sa ilalim ng Titulo VI ng Civil Rights Act ng 1964, kung saan itinatakda na walang tao, dahilan sa lahi, kulay o bansang pinagmulan, ang matatanggal mula sa paglahok, matatanggihan ng mga benepisyo, o makakaranas ng diskriminasyon sa ilalim ng programa nitong paghahatid ng mga serbisyo ng transportasyon. Para sa impormasyon tungkol sa County Connection Title VI Program, bumisita sa [countyconnection.com](http://countyconnection.com) o tumawag sa 925-676-7500 (TTY 711).

Ang sinumang tao na naniniwalang nakaranas sila ng diskriminasyon dahil sa lahi, kulay o bansang pinagmulan patungkol sa paghahatid ng mga serbisyo ng transportasyon ay may karapatang maghain ng reklamo sa loob ng 180 araw ng sinabing insidente. Maaari ninyong i-download ang pormularyo ng reklamo na nasa ibaba o humiling nito sa pamamagitan ng pagtawag sa 925-676-7500 (TTY 711). Ang isang nagrereklamo ay maaaring direktang maghain ng reklamo sa Federal Transit Administration sa pamamagitan ng paghahain ng reklamo sa Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Kung kinakailangan ang impormasyon sa iba pang wika, makipag-ugnayan sa 925-676-7500.

Russian

Транспортное управление Центрального района округа Контра-Коста (County Connection) предоставляет равный доступ к своим транспортным услугам в Центральном районе округа Контра-Коста. County Connection придерживается политики недискриминации при ведении своей деятельности, включая обязанности в соответствии с разделом VI Закона США о гражданских правах 1964 г., который предусматривает, что ни одному лицу не может быть отказано в участии или льготах и никто не может подвергаться дискриминации по признаку расы, цвета кожи или национального происхождения в рамках программы предоставления транзитных услуг района. Для получения информации о программе County Connection в соответствии с разделом VI посетите сайт [countyconnection.com](http://countyconnection.com) или позвоните по тел. 925-676-7500 (TTY 711).

Любой человек, считающий, что подвергся дискриминации по признаку расы, цвета кожи или национального происхождения в отношении предоставления транспортных услуг, имеет право

подать жалобу в течение 180 дней с момента предполагаемого инцидента. Вы можете загрузить форму жалобы ниже или запросить ее, позвонив по телефону (925)676-7500 (телетайп 711). Заявитель может подать жалобу непосредственно в Федеральную транспортную администрацию, отправив ее в Отдел по защите гражданских прав на имя координатора программы: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

За информацией на других языках обращайтесь по тел. 925-676-7500.

#### Vietnamese

Cơ quan Vận chuyển Trung tâm Contra Costa (Central Contra Costa Transit Authority (County Connection)) cung cấp sự tiếp cận bình đẳng đến các dịch vụ vận chuyển của chúng tôi tại Trung tâm Contra Costa. County Connection cam kết thực hiện chính sách không phân biệt đối xử trong hoạt động kinh doanh của chúng tôi, bao gồm các trách nhiệm theo Tiêu đề VI của Đạo luật Dân Quyền năm 1964, quy định rằng không ai có thể bị loại trừ vì lý do chủng tộc, màu da hoặc nguồn gốc quốc gia, bị từ chối cho tham gia, bị từ chối các lợi ích hoặc bị phân biệt đối xử trong chương trình cung cấp dịch vụ vận chuyển. Để biết thông tin về Chương trình Tiêu đề của County Connection, hãy truy cập vào [countyconnection.com](http://countyconnection.com) hoặc gọi số 925-676-7500 (TTY 711).

Bất cứ người nào tin rằng họ đã bị phân biệt đối xử dựa trên chủng tộc, màu da hoặc nguồn gốc quốc gia liên quan đến việc cung cấp dịch vụ vận chuyển có quyền nộp đơn khiếu nại trong vòng 180 ngày kể từ ngày xảy ra vụ việc bị cáo buộc. Bạn có thể tải xuống mẫu đơn khiếu nại bên dưới hoặc yêu cầu bằng cách gọi đến số 925-676-7500 (TTY 711). Người khiếu nại có thể nộp trực tiếp đơn khiếu nại cho Ban Quản Lý Vận Tải Liên Bang bằng cách nộp đơn khiếu nại cho Văn Phòng Dân Quyền, Người Nhận: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Nếu cần thông tin bằng ngôn ngữ khác, hãy liên hệ 925-676-7500.

#### Hindi

सेंट्रल कॉन्ट्रा कोस्टा ट्रांज़िट अथॉरिटी (काउंटी कनेक्शन) सेंट्रल कॉन्ट्रा कोस्टा में अपनी परिवहन सेवाओं तक एकसमान पहुँच प्रदान करती है। काउंटी कनेक्शन अपने व्यवसाय के संचालन में गैर-भेदभाव की नीति के लिए प्रतिबद्ध है, जिसमें इसकी 1964 के नागरिक अधिकार अधिनियम के टाइटल VI (Title VI of the Civil Rights Act of 1964) के तहत दी गई जिम्मेदारियां शामिल हैं, जो निर्दिष्ट करता है कि किसी भी व्यक्ति को, जाति, वर्ण या राष्ट्रीय मूल के आधार पर, इसके ट्रांज़िट (परिवहन) सेवाओं को उपलब्ध कराने के कार्यक्रम में भागीदारी से अलग नहीं किया

जाएगा, उसके लाभ से वंचित नहीं किया जाएगा, या उसके साथ भेदभाव नहीं किया जाएगा। काउंटी कनेक्शन टाइटल VI प्रोग्राम (कार्यक्रम) के बारे में जानकारी के लिए, [countyconnection.com](http://countyconnection.com) पर जाएं या 925-676-7500 (TTY 711) पर कॉल करें।

कोई भी व्यक्ति जो यह मानता है कि ट्रांज़िट सेवाओं को उपलब्ध कराने के संबंध में नस्ल, वर्ण या राष्ट्रीय मूल के आधार पर उसके साथ भेदभाव किया गया है, उसे कथित घटना के 180 दिनों के अंदर शिकायत दर्ज कराने का अधिकार है। आप नीचे शिकायत फ़ॉर्म डाउनलोड कर सकते हैं या इसके लिए 925-676-7500 (TTY 711) पर कॉल करके अनुरोध कर सकते हैं। एक शिकायतकर्ता नागरिक अधिकार कार्यालय के ध्यान हित, शिकायत दर्ज करके सीधे फ़ैडरल ट्रांज़िट एडमिनिस्ट्रेशन में शिकायत दर्ज कर सकता/सकती है: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

यदि किसी अन्य भाषा में जानकारी चाहिए, तो 925-676-7500 पर संपर्क करें।

#### Arabic

تمنح سلطة نقل كونترا كوستا المركزية (وكالة كونتي كونكشن) المساواة لجميع المواطنين في الوصول إلى خدمات النقل في كونترا كوستا. تلتزم الوكالة بسياسة عدم التمييز في تسيير أعمالها، بما في ذلك مسؤولياتها بموجب الباب السادس من قانون الحقوق المدنية لعام 1964 الذي ينص على أنه لا يجوز استبعاد أي شخص، على أساس العرق أو اللون أو الأصل القومي، من المشاركة، أو الحرمان من الفوائد، أو التعرض للتمييز في إطار برنامجها لتقديم خدمات النقل.

للحصول على معلومات حول برنامج County Connection Title VI، تفضل بزيارة الموقع: [countyconnection.com](http://countyconnection.com) أو اتصل بالرقم 925-676-7500 (TTY 711).

يحق لأي شخص يعتقد أنه تعرض للتمييز بسبب العرق أو اللون أو الأصل القومي فيما يتعلق بتلقي خدمات النقل تقديم شكوى في غضون مائة وثمانين (180) يومًا من الحادثة المزعومة. يمكنك تنزيل نموذج شكوى أدناه أو طلب نموذج بالاتصال بالرقم 925-676-7500 (TTY 711). يمكنك أيضًا تقديم شكوى إلى إدارة النقل الفيدرالية عن طريق تقديم الشكوى إلى مكتب الحقوق المدنية، Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

إذا كانت المعلومات مطلوبة بلغة أخرى، فاتصل بالرقم 925-676-7500.

## B. TITLE VI COMPLAINT PROCEDURES & FORM

The following is a summary of the complaint procedures:

### Title VI Administrator Procedures

1. Maintain log of consumer reports that are potential Title VI claims. These are claims the customer or customer service staff have identified as discrimination based on information available when the consumer report is entered or reviewed. At this initial notification and review stage, some complaints are determined to not be Title VI, mostly by virtue of not being a Title VI discrimination protected class. Discrimination allegations based on age, sex or disability are not Title VI and can be eliminated from further Title VI procedures.
2. Direct complainant to the Title VI Complaint Form (if not previously provided). Forms are available for download from the website or as hard copies sent by mail or picked up by complainants at Count Connection's administrative office. If complainant is unable to complete a written form, agency staff can fill one out on their behalf.
3. Once a Title VI Compliant Form is received, it is to be entered into a log, given a log number and entered into the Title VI Complaint Form Received database. Complaint form must be received within 180 days of alleged incident. If no investigation is initiated, clearly document the reason.
4. Inform complainant that a formal investigation is being conducted or that their complaint is not covered by Title VI. This must be done within 10 working days of receipt of the completed and signed Title VI Complaint Form.
5. Inform customer service that complaint has become a formal Title VI investigation or is not Title VI eligible. Be sure that non-Title VI issues associated with the complaint are being responded to (e.g. driver re-training, discipline, etc.).
6. Research existing information and attempt to determine employee who is the subject of the complaint. Determine who will be conducting investigation and see what is known already.
7. Inform investigator that there is a formal Title VI complaint and what additional information, documentation, and investigation deadlines are involved. Send investigator an

Investigation Form with Section 1 filled out. This should be done within 5 working days of receipt of the Title VI Complaint Form.

8. Investigators should conduct investigation as informed by procedures and policies. This could include contact and interviews with any witnesses. Actions could include counseling and discipline for employees. Investigation Forms should be completed and returned within 10 working days of receipt of the Investigation Form.
9. Draft Investigation Report.
10. Review Investigation Report with investigator. Discuss findings and/or recommendation for resolution.
11. Finalize Investigation Report.
12. If finding of violation of Title VI discrimination, recommend appropriate corrective action. If no finding of Title VI discrimination, explain why not.
13. Notify Complainant of finding (issue determination letter) and right to appeal and appeal process. Complainant should be notified of findings within 60 days of receipt of the complaint form.
14. Notify investigator of finding (including determination letter).
15. Send Investigation Report to General Manager's office. Complainant has 60 days after receipt of determination letter to appeal findings to the General Manager.
16. Update complaint file and log.

## **Investigator Process**

The person conducting the on the ground investigation will be informed that the complaint is a formal Title VI Investigation within 10 working days of receipt of a formal complaint.

Investigator must complete investigation (if necessary) and return completed Title VI Investigator Form within 20 working days of being informed of the formal complaint. Report must include names and titles of all who are contacted about the incident, any evidence reviewed (such as video tapes) and all other relevant information. Investigator is to state why the incident was not a case of

discrimination or what action was taken regarding the person accused of acting in a discriminatory manner. Follow up information may be needed within a 60-day time frame to respond to the complainant with the findings.

The investigation may include discussion of the complaint with all affected parties to determine the nature of the problem. The complainant may be represented by an attorney or other representative of his/her choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

## County Connection Title VI Investigator Form

### **Section 1 - Case Information (from Title VI Administrator)**

Title VI Complaint Form Number: \_\_\_\_\_  
Consumer Report & Folder Number (if it exists): \_\_\_\_\_  
Complainant Name: \_\_\_\_\_  
Investigator Name: \_\_\_\_\_  
Investigator Work Location: \_\_\_\_\_  
Investigation Completion Due Date: \_\_\_\_\_

### **Section 2 – Previous Investigation**

Has this incident/complaint been investigated previously? \_\_\_\_ Yes \_\_\_\_ No  
[If you answered "no" to this question, go to Section 3.]  
Was the previous investigation conducted with the discrimination charge in mind?  
\_\_\_\_ Yes \_\_\_\_ No  
[If you answered "no" to this question, go to Section 3.]  
Did the previous investigation result in a finding that discrimination was involved?  
\_\_\_\_ Yes \_\_\_\_ No  
Please explain why discrimination was not involved, if not previously documented:

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### **Section 3 – Investigation**

Date & time of incident: \_\_\_\_\_  
Names, ID (if applicable) and title of employee accused of discrimination.

Name: _____	Title: _____	ID# _____
Name: _____	Title: _____	ID# _____
Name: _____	Title: _____	ID# _____

Location of incident (including vehicle information): \_\_\_\_\_  
\_\_\_\_\_

Was there a determination that discrimination was involved? \_\_\_\_ Yes \_\_\_\_ No

If yes, what corrective action was taken?

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If it was determined there was no discrimination, how was that determination made?

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Was the complainant contacted? \_\_\_\_ Yes \_\_\_\_ No  
If yes, was complainant satisfied with the resolution of the issue/incident?  
\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ Unknown



## Title VI Complaint Procedures

If you believe that you have received discriminatory treatment based on race, color or national origin with regard to transit services delivery, you have the right to file a Title VI complaint with the Authority's Civil Rights Administrator within one-hundred and eighty (180) calendar days of the last alleged incident. You may download a complaint form by visiting [www.countyconnection.com](http://www.countyconnection.com). You may also call customer service and ask for a Title VI complaint form to be mailed to you. You may also submit a written statement that contains all the information listed below. Complaints should be mailed or delivered to:

County Connection  
Civil Rights Administrator  
2477 Arnold Industrial Way  
Concord, CA 94520

All complaints should include the following information:

1. Name, address, and telephone number of the complainant.
2. The basis of the complaint; (e.g., race, color, or national origin).
3. The date(s) on which the alleged discriminatory event occurred.
4. The nature of the incident that led the complainant to feel discrimination was a factor.
5. Names, addresses and telephone numbers of persons who may have knowledge of the event.
6. Other agencies or courts where complaint may have been filed and a contact name.

**Central Contra Costa Transit Authority  
Title VI Complaint Form**

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to: CCCTA Director of Recruitment & Employee Development, 2477 Arnold Industrial Way, Concord, California, 94520.

1) Complainant's Name: \_\_\_\_\_

2) Address: \_\_\_\_\_

3) City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

4) Phone: Home \_\_\_\_\_ Cell \_\_\_\_\_

5) Person discriminated against (if other than complainant)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

6) What was the discrimination based on? (Check all that apply):

Race

Color

National Origin

7) Date of incident resulting in discrimination: \_\_\_\_\_

8) Describe how you were discriminated against. What happened and who was responsible?

For additional space, attach additional sheets of paper.

9) Did you file this complaint with another federal, state, or local agency; or with a federal or state court? (check appropriate space)

Yes \_\_\_\_\_

No \_\_\_\_\_

If answer is Yes, then check each agency complaint was filed with:

Federal Agency \_\_\_\_\_ Federal Court \_\_\_\_\_ State Agency \_\_\_\_\_

State Court \_\_\_\_\_ Local Agency \_\_\_\_\_

10) Provide contact person information for the agency you also filed with complaint with:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Sign the complaint in the space below. Attach any documents you believe supports your complaint.

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

Note: A complaint also may be filed with: Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

## Translations

County Connection's Title VI Complaint Procedures and Form are translated into all nine "Safe Harbor" languages identified in the Language Assistance Plan.

### Spanish

Si usted cree que ha recibido un trato discriminatorio basado en raza, color u origen nacional con respecto a la prestación de servicios de tránsito, usted tiene el derecho de presentar una queja del título VI con el administrador de los derechos civiles de la autoridad dentro de ciento ochenta (180) días naturales del último incidente presunto. Usted puede descargar un formulario de queja visitando [www.countyconnection.com](http://www.countyconnection.com). También puede presentar una declaración por escrito que contiene todos los datos que se indican a continuación. Las quejas deben ser enviadas por correo o entregarse en:

County Connection  
Civil Rights Administrator  
2477 Arnold Industrial Way  
Concord, CA 94520

Todas las quejas deben incluir la siguiente información:

1. Nombre, dirección y número telefónico del reclamante.
2. La base de la queja; (raza, color u origen nacional).
3. La fecha (s) en que la supuesta discriminación ocurrió.
4. La naturaleza del incidente que llevó al reclamante a sentir la discriminación fue un factor.
5. Direcciones de nombres y números telefónicos de personas que pudieran tener conocimiento del evento.
6. Otros organismos o tribunales donde la queja se puede haber archivado y un nombre de contacto.

**Formulario de queja del Título VI de la autoridad de  
tránsito de Contra Costa Central**

Proporcione la siguiente información necesaria para procesar su queja. Contamos con asistencia disponible a solicitud. Complete este formulario y envíelo por correo o entréguelo en: CCCTA Director of Recruitment & Employee Development, 2477 Arnold Industrial Way, Concord, California, 94520.

- 1) Nombre del demandante: \_\_\_\_\_
- 2) Dirección: \_\_\_\_\_
- 3) Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código postal: \_\_\_\_\_
- 4) Teléfono: Casa \_\_\_\_\_ Celular \_\_\_\_\_
- 5) Persona contra la que se ha discriminado (si no es el demandante)  
Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código postal: \_\_\_\_\_
- 6) ¿En qué se basa la discriminación? (marque todas las que correspondan):  
Raza  
Color  
País de origen
- 7) Fecha del incidente que tuvo como resultado la discriminación: \_\_\_\_\_
- 8) Describa cómo se le discriminó. ¿Qué ocurrió o quién fue responsable? Para tener más espacio, adjunte hojas adicionales o use el reverso de este formulario.

9) ¿Presentó esta queja ante otra agencia federal, estatal o local o ante un tribunal federal o estatal? (marque el espacio correspondiente)

Sí \_\_\_\_\_

No \_\_\_\_\_

Si la respuesta es sí, verifique con cada agencia con la que se presentó la queja:

Agencia federal \_\_\_\_\_ Tribunal federal \_\_\_\_\_ Agencia del estado \_\_\_\_\_

Tribunal del estado \_\_\_\_\_ Agencia local \_\_\_\_\_

Proporcione la información de la persona de contacto de la agencia con la que también presentó la queja: Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código postal: \_\_\_\_\_

Fecha en que se presentó: \_\_\_\_\_

Firme la queja en el espacio a continuación. Adjunte todos los documentos que considere que respaldan su queja.

\_\_\_\_\_  
Firma de la persona que presenta la queja

\_\_\_\_\_  
Fecha

Chinese

如果您认为在接受交通服务时遭受有关种族、肤色或民族血统的歧视，您即拥有将标题六投诉提交至交通局的公民权利管理员处的权利。联邦和州法律要求在最近发生歧视之日起的 180 天内提交投诉。您可以访问 [countyconnection.com](http://countyconnection.com) 下载投诉表格。您还可以致电客户服务人员并要求通过邮寄的方式索取标题六投诉表格。您还可以提交包含下列所有信息的书面声明。应将投诉邮寄或送至：

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

所有投诉应包含下列信息：

1. 投诉人的姓名、地址以及电话号码。
2. 投诉依据（如种族、肤色或民族血统）。
3. 发生所称歧视事件的日期。
4. 导致投诉人认为遭受歧视的事件的性质。
5. 事件所涉及人员的姓名、地址和电话号码。
6. 曾受理所提交投诉的其他机构或法庭以及联系人姓名。

**Central Contra Costa Transit Authority**  
**标题六投诉表格**

请提供以下必要信息以便处理您的投诉。可根据请求提供协助。填写此表格并邮寄或送至：CCCTA Civil Rights Administrator（CCCTA 公民权利管理员），2477 Arnold Industrial Way, Concord, California, 94520。

1) 投诉人姓名： \_\_\_\_\_

2) 地址： \_\_\_\_\_

3) 城市： \_\_\_\_\_ 州： \_\_\_\_\_ 邮编： \_\_\_\_\_

4) 电话：住家 \_\_\_\_\_ 手机 \_\_\_\_\_

5) 被歧视人（如果被歧视人不是投诉人）

姓名： \_\_\_\_\_

地址： \_\_\_\_\_

城市： \_\_\_\_\_ 州： \_\_\_\_\_ 邮编： \_\_\_\_\_

6) 遭受哪些方面的歧视？（选择所有适用项）：

☐ 种族

☐ 肤色

☐ 民族血统

☐ 其他： \_\_\_\_\_

7) 发生歧视事件的日期： \_\_\_\_\_

8) 请说明您是如何遭受歧视的。发生了什么以及谁应对此事件负责？如需更多空白处，请自行附加几页说明或使用本表格的背面。

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9) 您是否曾将此投诉提交至另一联邦、州或当地机构，或提交至联邦或州法庭？  
(在相应位置勾选)

是 \_\_\_\_\_

否 \_\_\_\_\_

如回答是，则勾选收到投诉的各个机构：

联邦机构 \_\_\_\_\_ 联邦法庭 \_\_\_\_\_ 州机构 \_\_\_\_\_

州法庭 \_\_\_\_\_ 当地机构 \_\_\_\_\_ 其他 \_\_\_\_\_

10) 还请提供收到投诉的机构联系人信息：

姓名： \_\_\_\_\_

地址： \_\_\_\_\_

城市： \_\_\_\_\_ 州： \_\_\_\_\_ 邮编： \_\_\_\_\_

提交日期： \_\_\_\_\_

请在下方针对本投诉签名。请附加所有可以支持您投诉的文档材料。

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投诉人签名

日期

Korean

인종, 피부색 또는 출신 국가로 인해 대중교통 이용에 있어 차별적 대우를 받았다고 생각하신다면 인권 사무국 담당자를 통해 Title VI 고발 사항을 접수하실 권리가 있습니다. 연방, 주 정부 법은 고발 사항이 사건 발생 이후 180 일 이내에 접수되도록 규정하고 있습니다. countyconnection.com 에서 고발 양식을 다운로드하시거나 고객 상담 번호로 전화하셔서 Title VI 고발 접수 양식을 우편 배송하도록 요청하실 수 있습니다. 또는 아래 모든 사항을 포함하는 서면진술서를 제출하실 수도 있습니다. 다음 주소로 고발 사항을 보내주십시오.

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

모든 고발 사항 제출서에는 다음 정보가 포함되어야 합니다.

1. 고발자 이름, 주소, 전화번호.
2. 고발 내용(예: 인종, 피부색, 출신 국가).
3. 해당 사건 발생일.
4. 차별이 발생했다고 생각하게 만든 사건의 본질.
5. 사건 목격자(들)의 이름, 주소, 전화번호.
6. 고발 사항이 접수된 기타 기관 또는 법원과 담당자 이름.

**Central Contra Costa 교통국**  
**Title VI 고발 사항 신고 양식**

고발 내용을 처리할 수 있도록 다음 정보를 기입해 주십시오. 요청 시 도움을 드릴 수 있습니다. 본 양식을 작성하여 다음 주소로 보내주십시오. CCCTA Civil Rights Administrator, 2477 Arnold Industrial Way, Concord, California, 94520.

1) 고발자 이름: \_\_\_\_\_

2) 주소: \_\_\_\_\_

3) 시: \_\_\_\_\_ 주: \_\_\_\_\_ 우편번호: \_\_\_\_\_

4) 전화번호: 자택 \_\_\_\_\_ 핸드폰 \_\_\_\_\_

5) 차별받은 당사자(고발자와 다를 경우)

이름: \_\_\_\_\_

주소: \_\_\_\_\_

시: \_\_\_\_\_ 주: \_\_\_\_\_ 우편번호: \_\_\_\_\_

6) 무엇이 차별의 원인이었습니까? (해당 항목에 모두 체크 표시하십시오.):

☐ 인종

☐ 피부색

☐ 출신 국가

☐ 기타: \_\_\_\_\_

7) 차별 사건 발생일: \_\_\_\_\_

8) 어떤 식으로 차별을 당했는지 설명해 주십시오. 무슨 일이 있었으며 누구로 인해 발생했습니까? 작성 공간이 추가로 필요하시면 별도의 종이나 본 양식의 뒷면을 사용하십시오.

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9) 본 고발 사항을 다른 연방 정부, 주, 지역 기관, 연방 또는 주 법원에 접수하셨습니까? (해당 사항에 체크 표시하십시오.)

예 \_\_\_\_\_

아니요 \_\_\_\_\_

'예'라고 답하신 경우 접수하신 기관에 체크 표시하십시오.

연방 정부 기관 \_\_\_\_\_ 연방 법원 \_\_\_\_\_ 주 정부 기관 \_\_\_\_\_

주 법원 \_\_\_\_\_ 지역 기관 \_\_\_\_\_ 기타 \_\_\_\_\_

10) 접수하신 기관의 담당자 연락처를 기입하십시오. 이름:

주소: \_\_\_\_\_

시: \_\_\_\_\_ 주: \_\_\_\_\_ 우편번호: \_\_\_\_\_

접수 일자: \_\_\_\_\_

아래 공간에 서명하십시오. 해당 고발 사항을 뒷받침할 서류가 있다면 동봉하십시오.

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고발자 서명

날짜

Farsi

اگر فکر می کنید در رابطه با دریافت خدمات جابجایی و حمل و نقل بر اساس نژاد، رنگ پوست یا ملیتتان مورد تبعیض قرار گرفته اید، از این حق برخوردارید تا یک شکایت بخش VI را به مجری خدمات حمل و نقل ارائه کنید. بر اساس قانون فدرال و ایالتی لازم است که در مدت زمان صد و هشتاد (180) روز از زمان بروز حادثه مربوطه، شکایتتان را مطرح کنید. با بازدید از سایت [countyconnection.com](http://countyconnection.com) می توانید فرم شکایت را پر کنید. همچنین می توانید با خدمات مشتری تماس بگیرید و درخواست کنید یک فرم شکایت بخش VI برایتان پست شود. همچنین می توانید یک بیانیه کتبی شامل همه اطلاعات فهرست شده در زیر ارائه کنید. شکایت ها را باید پست کرده یا شخصاً به این آدرس تحویل دهید:

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

همه شکایت ها باید شامل اطلاعات زیر باشند:

1. نام، آدرس و شماره تلفن فرد شاکی.
2. دلیل شکایت (مثل نژاد، رنگ پوست یا ملیت).
3. تاریخ بروز حادثه تبعیض آمیز.
4. نوع حادثه که منجر به بروز شکایت شده است و احساس می کنید که تبعیضی صورت گرفته است.
5. نام، آدرس و شماره تلفن افرادی که ممکن است از حادثه روی داده مطلع باشند.
6. سایر آژانس ها یا دادگاه ها که شکایت در آنها مطرح شده است و نام طرف تماس.

سازمان حمل و نقل کونترا کوستای مرکزی  
فرم ارائه شکایت بخش VI

برای رسیدگی به شکایتتان، لطفاً اطلاعات ضروری زیر را ارائه کنید. در صورت درخواست، به شما راهنمایی خواهد شد. این فرم را تکمیل کنید و آن را پست کنید یا شخصاً به این آدرس تحویل دهید:

CCCTA Civil Rights Administrator, 2477 Arnold Industrial Way, Concord, California, 94520.

(1) نام شاکی: \_\_\_\_\_

(2) آدرس: \_\_\_\_\_

(3) شهر: \_\_\_\_\_ ایالت: \_\_\_\_\_ کد پستی: \_\_\_\_\_

(4) تلفن: منزل: \_\_\_\_\_ تلفن همراه \_\_\_\_\_

(5) فردی که نسبت به او تبعیض قائل شده است (اگر فردی به غیر از شاکی است)

نام: \_\_\_\_\_

آدرس: \_\_\_\_\_

شهر: \_\_\_\_\_ ایالت: \_\_\_\_\_ کد پستی: \_\_\_\_\_

(6) این تبعیض بر چه اساسی صورت گرفته است؟ (تمام موارد مربوطه را علامت بزنید):

☐ نژاد

☐ رنگ پوست

☐ ملیت

☐ سایر موارد: \_\_\_\_\_

(7) تاریخ رویداد منجر به بروز تبعیض: \_\_\_\_\_

(8) توصیف کنید چطور مورد تبعیض قرار گرفتید؟ چه اتفاقی افتاد و چه کسی مسئول بود؟ اگر به جای بیشتری نیاز دارید، یک برگه دیگر به این برگه وصل کنید یا از پشت این فرم استفاده کنید.

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آیا شکایتتان را در یک آژانس فدرال، ایالتی یا آژانس محلی دیگر یا در دادگاه فدرال یا ایالتی مطرح کرده اید؟  
(قسمت مربوطه را علامت بزنید)

بله \_\_\_\_\_

خیر \_\_\_\_\_

اگر پاسختان بله است، آژانسی که شکایت در آن مطرح شده است را علامت بزنید:

آژانس فدرال \_\_\_\_\_ دادگاه فدرال \_\_\_\_\_ آژانس ایالتی \_\_\_\_\_

دادگاه ایالتی \_\_\_\_\_ آژانس محلی \_\_\_\_\_ موارد دیگر \_\_\_\_\_

10) اطلاعات تماس مربوط به فردی که در آژانس شکایتتان را با او در میان گذاشته اید، عنوان کنید:

نام: \_\_\_\_\_

آدرس: \_\_\_\_\_

شهر: \_\_\_\_\_ ایالت: \_\_\_\_\_ کد پستی: \_\_\_\_\_

تاریخ ثبت پرونده: \_\_\_\_\_

بخش زیر را برای شکایتتان امضا کنید. هر سندی که فکر می کنید می تواند شکایتتان را پشتیبانی کند، پیوست کنید.

امضای شاکی \_\_\_\_\_ تاریخ \_\_\_\_\_

Tagalog

Kung naniniwala kang nakatanggap ka ng pakikitungong may-diskriminasyon batay sa lahi, kulay o bansang pinagmulan kaugnay sa paghahatid ng mga serbisyong transportasyon, may karapatan kang maghain ng reklamo sa Title VI sa Civil Rights Administrator ng Authority. Hinihingi ng mga batas na Pederal at Pang-estado na ihain ang mga reklamo sa loob ng isangdaan at walumpung (180) araw sa kalendaryo mula sa sinasabing insidente. Maaari mong i-download ang form para sa paghain ng reklamo sa pamamagitan ng pagbisita sa [countyconnection.com](http://countyconnection.com). Maaari ka ring tumawag sa customer service at hilinging mapadalhan ka sa koreo ng form ng reklamo sa Title VI. Maaari mo ring isumite ang isang nakasulat na pahayag na naglalaman ng lahat ng impormasyong nakalista sa ibaba. Dapat ipakoreo o ipahatid ang mga reklamo sa:

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

Dapat kasama sa lahat ng reklamo ang mga sumusunod na impormasyon:

1. Pangalan, address, at numero ng telepono ng nagrereklamo.
2. Ang batayan ng reklamo; (hal., lahi, kulay, o bansang pinagmulan).
3. Ang (mga) petsa kung kailan nangyari ang sinasabing pangyayaring may diskriminasyon.
4. Ang uri ng insidente na nagbigay-daan upang maramdaman ng nagrereklamo na isang salik ang diskriminasyon.
5. Mga pangalan, address at numero ng telepono ng mga taong maaaring may alam sa pangyayari.
6. Iba pang ahensiya o hukuman kung saan maaaring inihain ang reklamo at pangalan ng nakaugnayan.



**Central Contra Costa Transit Authority**  
**Form ng Reklamo sa Title VI**

Mangyaring ibigay ang sumusunod na impormasyong kinakailangan upang maproseso ang iyong reklamo. May makukuhang tulong sa sandaling humiling. Kumpletuhin ang form na ito at ikoreo o ihatid sa: CCCTA Director of Recruitment & Employee Development, 2477 Arnold Industrial Way, Concord, California, 94520.

1) Pangalan ng Nagrereklamo: \_\_\_\_\_

2) Address: \_\_\_\_\_

3) Lungsod: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip: \_\_\_\_\_

4) Telepono: Tahanan \_\_\_\_\_ Cell \_\_\_\_\_

5) Taong nakaranas ng diskriminasyon (kung iba pa kaysa nagrereklamo)

Pangalan: \_\_\_\_\_

Address: \_\_\_\_\_

Lungsod: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip: \_\_\_\_\_

6) Saan ibinatay ang diskriminasyon? (Tsekan ang lahat ng naaangkop):

Lahi

Kulay

Bansang Pinagmulan

7) Petsa ng insidenteng humantong sa diskriminasyon: \_\_\_\_\_

8) Ilarawan kung paano ka naging biktima ng diskriminasyon. Ano ang nangyari at sino ang responsable? Para sa karagdagang espasyo, maglakip ng mga karagdagang piraso ng papel o gamitin ang likod ng form na ito.

9) Inihain mo ba ang reklamong ito sa iba pang ahensiyang pederal, pang-estado, o lokal; o sa hukumang pederal o pang-estado? (tsekan ang naaangkop na espasyo)

Oo \_\_\_\_\_

Hindi \_\_\_\_\_

Kung Oo ang sagot, saka tsekan ang bawat ahensiyang pinaghainan ng reklamo:

Ahensiyang Pederal \_\_\_\_\_ Hukumang Pederal \_\_\_\_\_ Ahensiyang Pang-estado \_\_\_\_\_

Hukumang Pang-estado \_\_\_\_\_ Lokal na Ahensiya \_\_\_\_\_

10) Ibigay ang impormasyon ng taong nakaugnay sa ahensiyang pinaghainan mo rin ng reklamo:

Pangalan: \_\_\_\_\_

Address: \_\_\_\_\_

Lungsod: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip: \_\_\_\_\_

Petsa nang Ihain: \_\_\_\_\_

Sign the complaint in the space below. Attach any documents you believe supports your complaint.

\_\_\_\_\_  
Lagda ng Nagrereklamo

\_\_\_\_\_  
Petsa

Russian

Если вы считаете, что при получении транспортных услуг столкнулись с дискриминацией по признаку расы, цвета кожи или национального происхождения, вы имеете право подать жалобу о нарушении положений Раздела VI администратору Отдела по защите гражданских прав. Согласно федеральным законам и законам штата, жалоба должна быть подана в течение 180 (ста восьмидесяти) календарных дней с момента последнего предполагаемого инцидента. Форму жалобы можно загрузить с сайта [countyconnection.com](http://countyconnection.com). Вы также можете позвонить в центр обслуживания клиентов и попросить отправить вам по почте форму жалобы о нарушении положений Раздела VI. Вы также можете подать письменное заявление, содержащее все указанные ниже сведения. Жалобы необходимо отправлять или доставлять по адресу:

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

Все жалобы должны содержать следующую информацию:

1. Имя, адрес и номер телефона заявителя.
2. Основание для жалобы (дискриминация по расе, цвету кожи или национальному происхождению).
3. Дата предполагаемого случая дискриминации.
4. Характер инцидента, во время которого заявитель почувствовал, что столкнулся с дискриминацией.
5. Имена, адреса и номера телефонов лиц, которые могут быть осведомлены об этом событии.
6. Другие учреждения или суды, в которые могли быть поданы жалобы, и имена контактных лиц.

**Транспортное управление центрального округа Контра-Коста**  
**Форма жалобы о нарушении положений Раздела VI**

Предоставьте следующую информацию, необходимую для рассмотрения жалобы. При необходимости обратитесь за помощью. Заполните эту форму и отправьте или доставьте ее по адресу: CCCTA Director of Recruitment & Employee Development, 2477 Arnold Industrial Way, Concord, California, 94520.

1) Имя заявителя: \_\_\_\_\_

2) Адрес \_\_\_\_\_

3) Город: \_\_\_\_\_ Штат: \_\_\_\_\_ Почтовый индекс: \_\_\_\_\_

4) Телефон: дом. \_\_\_\_\_ моб \_\_\_\_\_

5) Лицо, которое подверглось дискриминации (если отличается от заявителя)

Имя: \_\_\_\_\_

Адрес: \_\_\_\_\_

Город: \_\_\_\_\_ Штат: \_\_\_\_\_ Почтовый индекс: \_\_\_\_\_

6) На чем была основана дискриминация? (Отметьте все подходящие варианты.)

Расовая принадлежность

Цвет кожи

Национальное происхождение

7) Дата инцидента, во время которого произошла дискриминация: \_\_\_\_\_

8) Опишите, как вы подверглись дискриминации. Что произошло и кто несет ответственность? Если вам необходимо больше места, приложите дополнительные листы бумаги или используйте обратную сторону этой формы.

9) Вы подали эту жалобу в другой федеральный орган, орган штата или местный орган; или в федеральный суд или суд штата? (Отметьте соответствующий пункт.)

Да \_\_\_\_\_

Нет \_\_\_\_\_

Если вы ответили «Да», отметьте все органы, в которые была подана жалоба:

Федеральный орган \_\_\_\_\_ Федеральный суд \_\_\_\_\_ Орган штата \_\_\_\_\_

Суд штата \_\_\_\_\_ Местный орган \_\_\_\_\_

10) Укажите данные контактного лица для органа, в который вы также подали жалобу::

Имя: \_\_\_\_\_

Адрес: \_\_\_\_\_

Город: \_\_\_\_\_ Штат: \_\_\_\_\_ Почтовый индекс: \_\_\_\_\_

Дата подачи: \_\_\_\_\_

Подпишите жалобу в предусмотренном месте ниже. Приложите любые документы, которые могут подтвердить вашу жалобу.

\_\_\_\_\_  
Подпись заявителя

\_\_\_\_\_  
Дата

Vietnamese

Nếu quý vị cho rằng mình bị phân biệt đối xử dựa trên chủng tộc, màu da hoặc nguồn gốc quốc gia về vấn đề cung cấp dịch vụ vận tải, quý vị có quyền nộp đơn khiếu nại Tiêu Đề VI cho Người Quản Lý Dân Quyền của Cơ Quan. Luật Liên Bang và Tiểu Bang yêu cầu đơn khiếu nại phải được nộp trong vòng một trăm tám mươi (180) ngày theo lịch kể từ khi xảy ra sự cố bị cáo buộc gần đây nhất. Quý vị cũng có thể tải về mẫu đơn khiếu nại bằng cách truy cập [countyconnection.com](http://countyconnection.com). Quý vị cũng có thể gọi cho dịch vụ khách hàng và yêu cầu họ gửi cho quý vị mẫu đơn khiếu nại Tiêu Đề VI qua thư. Quý vị cũng có thể gửi văn bản tuyên bố có chứa tất cả thông tin được liệt kê bên dưới. Nên gửi đơn khiếu nại qua thư hoặc chuyển đến:

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

Tất cả các đơn khiếu nại phải bao gồm thông tin sau:

1. Tên, địa chỉ và số điện thoại của người khiếu nại.
2. Cơ sở khiếu nại; (ví dụ: chủng tộc, màu da hoặc nguồn gốc quốc gia).
3. (Những) ngày xảy ra sự kiện phân biệt đối xử bị cáo buộc.
4. Bản chất của sự cố khiến cho người khiếu nại cảm thấy bị phân biệt đối xử là một yếu tố.
5. Tên, địa chỉ và số điện thoại của những người có thể biết sự kiện.
6. Các cơ quan hoặc tòa án khác, nơi có thể nộp đơn khiếu nại và tên liên hệ.

**Cơ Quan Vận Tải Trung Tâm Contra Costa**  
**Mẫu Đơn Khiếu Nại Tiêu Đề VI**

Vui lòng cung cấp thông tin cần thiết sau đây để xử lý đơn khiếu nại của quý vị. Hiện có trợ giúp theo yêu cầu. Hoàn thành mẫu này và gửi qua thư hoặc chuyển đến: CCCTA Civil Rights Administrator, 2477 Arnold Industrial Way, Concord, California, 94520.

- 1) Tên Người Khiếu Nại: \_\_\_\_\_
- 2) Địa Chi: \_\_\_\_\_
- 3) Thành Phố: \_\_\_\_\_ Tiểu Bang: \_\_\_\_\_ Mã Bưu Chính: \_\_\_\_\_
- 4) Điện Thoại: Nhà Riêng \_\_\_\_\_ Di Động \_\_\_\_\_
- 5) Người bị phân biệt đối xử (nếu không phải là người khiếu nại)  
Tên: \_\_\_\_\_  
Địa Chi: \_\_\_\_\_  
Thành Phố: \_\_\_\_\_ Tiểu Bang: \_\_\_\_\_ Mã Bưu Chính: \_\_\_\_\_
- 6) Cơ sở của việc phân biệt đối xử là gì? (Đánh dấu chọn tất cả các mục phù hợp):
  - ☐ Chủng Tộc
  - ☐ Màu Da
  - ☐ Nguồn Gốc Quốc Gia
  - ☐ Khác: \_\_\_\_\_
- 7) Ngày xảy ra sự cố dẫn đến việc phân biệt đối xử: \_\_\_\_\_
- 8) Mô tả việc quý vị bị phân biệt đối xử như thế nào. Điều gì đã xảy ra và ai chịu trách nhiệm? Để có thêm chỗ trống, hãy đính kèm thêm giấy hoặc sử dụng mặt sau của mẫu này.

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9) Quý vị có nộp đơn khiếu nại này cho cơ quan liên bang, tiểu bang hoặc địa phương khác; hoặc cho tòa án liên bang hoặc tiểu bang không? (đánh dấu chọn vào chỗ trống thích hợp)

Có \_\_\_\_\_

Không \_\_\_\_\_

Nếu câu trả lời là Có, hãy đánh dấu vào từng cơ quan mà quý vị đã nộp đơn khiếu nại:

Cơ Quan Liên Bang \_\_\_\_\_ Tòa Án Liên Bang \_\_\_\_ Cơ Quan Tiểu Bang \_\_\_\_\_

Tòa Án Tiểu Bang \_\_\_\_\_ Cơ Quan Địa Phương \_\_\_\_\_ Khác \_\_\_\_\_

10) Cung cấp thông tin của người liên hệ cho cơ quan mà quý vị đã nộp đơn khiếu nại:

Tên: \_\_\_\_\_

Địa Chỉ: \_\_\_\_\_

Thành Phố: \_\_\_\_\_ Tiểu Bang: \_\_\_\_\_ Mã Bưu Chính: \_\_\_\_\_

Ngày Nộp: \_\_\_\_\_

Ký tên vào đơn khiếu nại ở chỗ trống bên dưới. Đính kèm bất kỳ tài liệu nào mà quý vị cho là sẽ hỗ trợ đơn khiếu nại của mình.

\_\_\_\_\_  
Chữ Ký của Người Khiếu Nại

\_\_\_\_\_  
Ngày



Hindi

यदि आपको लगता है कि ट्रांज़िट सेवाएं देते समय आपके साथ जाति, रंग या राष्ट्रीय मूल के आधार पर भेदभाव का व्यवहार किया गया है, तो आपको अथॉरिटी के नागरिक अधिकारों के प्रशासक के पास टाइटल VI शिकायत दर्ज करने का अधिकार है। फ़ेडरल तथा स्टेट के कानून अपेक्षा करते हैं कि पिछली कथित घटना के एक सौ अस्सी (180) कैलेंडर दिनों के भीतर शिकायतें दर्ज की जाएं। आप [countyconnection.com](http://countyconnection.com) पर जाकर शिकायत संबंधी फ़ार्म डाउनलोड कर सकते हैं। आप ग्राहक सेवा पर भी कॉल कर सकते हैं और आपको टाइटल VI शिकायत संबंधी फ़ार्म डाक द्वारा भेजने के लिए कहें। आप लिखित बयान भी जमा कर सकते हैं, जिसमें नीचे दी गई सारी जानकारी होनी चाहिए। शिकायतें दिए गए पते पर डाक द्वारा भेजी जानी चाहिए:

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

सभी शिकायतों में निम्नलिखित जानकारी शामिल होनी चाहिए:

1. शिकायतकर्ता का नाम, पता और टैलिफोन नंबर।
2. शिकायत का आधार; (जैसे जाति, रंग या राष्ट्रीय मूल)।
3. जिस तिथि(यों) पर कथित भेदभाव वाली घटना घटी थी।
4. घटना की प्रकृति, जिसमें शिकायतकर्ता को महसूस हुआ भेदभाव का कारक शामिल था।
5. उन व्यक्तियों के नाम, पते और टैलिफोन नंबर, जिन्हें घटना की जानकारी हो सकती है।
6. अन्य ऐजेंसियां या अदालतें, जहाँ शिकायत दर्ज की जा सकती है और एक संपर्क नाम।

**सैंट्रल कौन्ट्रा कौस्टा ट्रांज़िट अथॉरिटी**  
**टाइटल VI शिकायत संबंधी फ़ार्म**

आपकी शिकायत पर कार्रवाई शुरू करने के लिए, कृपया निम्नलिखित ज़रूरी जानकारी उपलब्ध कराएं।  
अनुरोध पर सहायता उपलब्ध है। यह फ़ार्म भरें और दिए गए पते पर डाक से भेजें या इस पते पर दें:  
CCCTA Director of Recruitment & Employee Development, 2477 Arnold Industrial Way,  
Concord, California, 94520.

1) शिकायतकर्ता का नाम: \_\_\_\_\_

2) पता: \_\_\_\_\_

3) शहर: \_\_\_\_\_ स्टेट: \_\_\_\_\_ ज़िप: \_\_\_\_\_

4) फोन: घर \_\_\_\_\_ सैल \_\_\_\_\_

5) जिस व्यक्ति के साथ पक्षपात हुआ है (यदि शिकायतकर्ता के अलावा कोई और है)

नाम: \_\_\_\_\_

पता: \_\_\_\_\_

शहर: \_\_\_\_\_ स्टेट: \_\_\_\_\_ ज़िप: \_\_\_\_\_

6) पक्षपात किस आधार पर हुआ था? (लागू सभी पर निशान लगाएं):

जाति

रंग

राष्ट्रीय मूल

7) पक्षपात के परिणामस्वरूप घटना की तिथि: \_\_\_\_\_

8) बताएं कि आपके विरुद्ध पक्षपात कैसे हुआ था। क्या हुआ था और कौन ज़िम्मेदार है? अधिक स्थान के लिए कागज़ की अतिरिक्त शीट्स संलग्न करें।

9) क्या आपने यह शिकायत किसी अन्य फ़ैडरल, स्टेट या स्थानीय ऐजेंसी को; या फ़ैडरल या स्टेट अदालत को की है? (उपयुक्त स्थान पर निशान लगाएं)

हाँ \_\_\_\_

नहीं \_\_\_\_

यदि उत्तर हाँ, है तो फिर आप उस प्रत्येक ऐजेंसी पर निशान लगाएं, जहाँ आपने शिकायत दर्ज की थी:

फ़ैडरल ऐजेंसी \_\_\_\_ फ़ैडरल अदालत \_\_\_\_ स्टेट ऐजेंसी \_\_\_\_

स्टेट अदालत \_\_\_\_ स्थानीय ऐजेंसी \_\_\_\_

10) ऐजेंसी के लिए उस संपर्क व्यक्ति संबंधी जानकारी भी उपलब्ध करें, जिसके पास आपने शिकायत दर्ज कराई है:

नाम: \_\_\_\_\_

पता: \_\_\_\_\_

शहर: \_\_\_\_\_ स्टेट: \_\_\_\_\_ ज़िप: \_\_\_\_\_

शिकायत दर्ज करने की तिथि: \_\_\_\_\_

नीचे दिए गए स्थान में शिकायत पर हस्ताक्षर करें। कोई भी दस्तावेज़ संलग्न करें, जिसके बारे में आपको लगता है कि वह आपकी शिकायत का समर्थन करता है।

शिकायतकर्ता के हस्ताक्षर

तिथि

Arabic

إذا كنت تعتقد أنك قد تعرضت للتمييز بسبب العرق أو اللون أو الأصل القومي فيما يتعلق بتقديم خدمات النقل، فيحق لك تقديم شكوى بموجب الباب السادس إلى مدير الحقوق المدنية بالسلطة. تتطلب القوانين الفيدرالية وقوانين الولايات تقديم الشكاوى في غضون مائة وثمانين (180) يومًا تقويميًا من آخر حادثة تمييز مزعومة. يمكنك تنزيل نموذج شكوى عن طريق زيارة [countyconnection.com](http://countyconnection.com). يمكنك أيضًا الاتصال بخدمة العملاء وطلب إرسال نموذج شكوى من الباب السادس إليك بالبريد. يمكنك أيضًا تقديم بيان مكتوب يحتوي على جميع المعلومات الواردة أدناه. يجب إرسال الشكاوى بالبريد أو تسليمها إلى:

County Connection  
Director of Recruitment & Employee Development  
2477 Arnold Industrial Way  
Concord, CA 94520

يجب أن تتضمن جميع الشكاوى المعلومات التالية:

1. اسم وعنوان ورقم هاتف مقدم الشكوى.
2. أساس الشكوى. (على سبيل المثال، العرق أو اللون أو الأصل القومي).
3. التاريخ (التواريخ) الذي وقع فيه حادثة التمييز المزعومة.
4. طبيعة الحادثة التي دفعت مقدم الشكوى إلى الشعور بالتمييز كان عاملاً.
5. أسماء وعناوين وأرقام هواتف الأشخاص الذين قد يكون لديهم علم بالحدث.
6. الوكالات أو المحاكم الأخرى التي ربما تم تقديم شكوى فيها واسم جهة الاتصال.

سلطة نقل كونترا كوستا المركزية  
نموذج شكوى بموجب الباب السادس

يرجى تقديم المعلومات التالية اللازمة لمعالجة شكواك. المساعدة متاحة عند الطلب. أكمل هذا النموذج وأرسله بالبريد أو أرسله إلى: مدير التوظيف وتطوير الموظفين في سلطة نقل كونترا كوستا المركزية، 2477 طريق أرنولد الصناعي، كونكورد، كاليفورنيا، 94520.

(1) اسم مقدم الشكوى: \_\_\_\_\_

(2) العنوان: \_\_\_\_\_

(3) المدينة: \_\_\_\_\_ الولاية: \_\_\_\_\_ الرمز البريدي: \_\_\_\_\_

(4) الهاتف: المنزلي \_\_\_\_\_ المحمول \_\_\_\_\_

(5) الشخص الذي تعرض للتمييز (غير مقدم الشكوى)

الاسم: \_\_\_\_\_

العنوان: \_\_\_\_\_

المدينة: \_\_\_\_\_ الولاية: \_\_\_\_\_ الرمز البريدي: \_\_\_\_\_

(6) على ماذا كان يستند التمييز؟ (حدد كل ما ينطبق عليه):

العرق

اللون

الأصل القومي

(7) تاريخ الحدث الذي أدى إلى التمييز: \_\_\_\_\_

(8) صف كيف تعرضت للتمييز. ماذا حدث ومن المسؤول؟ للحصول على مساحة إضافية، قم بإرفاق أوراق إضافية.

9) هل قدمت هذه الشكوى إلى وكالة فيدرالية أو تابعة للولاية أو محلية أخرى؛ أو مع محكمة فيدرالية أو تابعة للولاية؟ (تحقق من المساحة المناسبة)

نعم —

لا —

إذا كانت الإجابة بنعم، فتتحقق من تقديم كل شكوى وكالة مع:

الوكالة الفيدرالية \_\_\_\_\_ المحكمة الفيدرالية \_\_\_\_\_ الوكالة الحكومية \_\_\_\_\_

محكمة الولاية \_\_\_\_\_ وكالة محلية \_\_\_\_\_

10) قَدِّم معلومات جهة الاتصال للوكالة التي قَدِّمَت شكوى إليها أيضاً مع:

الاسم: \_\_\_\_\_

العنوان: \_\_\_\_\_

المدينة: \_\_\_\_\_ الولاية: \_\_\_\_\_ الرمز البريدي: \_\_\_\_\_

تاريخ التقديم: \_\_\_\_\_

قم بتوقيع الشكوى في الفراغ أدناه. أرفق أي مستندات تعتقد أنها تدعم شكواك.

توقيع مقدم الشكوى التاريخ

## C. PUBLIC PARTICIPATION PLAN

### Purpose of the Public Participation Plan

Public participation is the process through which stakeholders can partake directly in agency decision making, and express their concerns, desires, and values. County Connection's planning process and the Public Participation Plan (PPP) serves as a roadmap to ensure the public has sufficient access to information and can provide meaningful input into decisions made regarding the future of transit service in Central Contra Costa County.

This document will discuss the strategies used to attain feedback from the public. This plan is to be used when County Connection embarks upon service planning activities or other undertakings wherein public participation plays a critical role in a successful outcome.

### Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure this group has adequate access to the agency's programs and activities, meaning that public participation opportunities should also be accessible to those who have a limited understanding of English (spoken and/or written).

### Executive Order 12898

The PPP has been designed to be inclusive of all populations in County Connection's service area and includes a detailed public participation process, clear goals, and a variety of public participation methods to provide information and invite the public to give input throughout decision-making processes, and performance measures and objectives.

### Purpose of the PPP:

1. To inform the public about transportation issues and planning processes
2. To establish the process through which the public can express concerns, desires, and values
3. To reach a wide range of residents and workers, and increase the participation of under-represented populations

4. To ensure County Connection's programs and activities reflect the community values
5. To improve service outcomes based on public input

## Public Participation Strategies

The following section includes strategies for ensuring the public has access to information necessary to participate in future County Connection planning and policy development efforts, including all fare changes and major service changes. In designing outreach and public strategies, County Connection uses traditional and social media, and other tools such as the following.

### Outreach Tools

#### 1. Radio, Television, Newspaper

Publicizing public participation opportunities and outreach information through newspapers that serve both English-speaking and language-specific audiences can help spread the word about these events.

#### 2. Web Resources

Currently, County Connection posts notices and announcements on the agency's website ([www.countyconnection.com](http://www.countyconnection.com)), Facebook, Twitter, Instagram, and Nextdoor and can send information via e-mail and text to customers on an opt-in basis.

Social media has gained prominence in the past decade and is often a faster means of conveying news than traditional media. Facebook, Twitter, Instagram, Nextdoor, and others are all potential outlets through which County Connection reaches the public. Social media is relatively easy to use and is also less costly than other strategies.

#### 3. On-Board Information Resources

Many riders and community members can access information about public participation methods pertaining to projects or service plans at BART stations as well as libraries, senior centers, and colleges within the service area. County Connection also provides written and printed information on buses as an efficient way to convey messages about potential service or fare changes, or other planning efforts. Destination signs can also provide information that is easily seen by the community. County Connection also uses internal electronic message signs and audio announcements.



#### **4. Customer Service**

The public can call in to the call center both to receive information and to give comments and input. The customer service number is always provided on County Connection materials. Staff in the customer service call center has full-time access to a telephone translation service covering the full range of languages.

#### **5. Print Materials**

In addition to on-board printed information, County Connection publicizes public participation opportunities and outreach information via print materials (such as newsletters, flyers, and other direct mail materials). This method of outreach can be expensive but effective. Crucial information must be translated into the languages identified as spoken and/or written by the target populations. If all information cannot be translated, notices can describe where to obtain translations/interpretations.

#### **6. Surveys**

County Connection conducts a statistically valid on-board survey of passengers every three years. Issue-specific surveys may be used in certain circumstances. Surveys can be conducted in person or through the telephone, pen and paper, and/or online means. Printed surveys may have a low response rate. Telephone surveys may be more effective but are often costly. Internet surveys are the easiest of the three options for the agency to conduct, but only reach those with internet access, which may skew the results. Any survey must include adequate and appropriate translations.

County Connection's most recent on-board survey was conducted in person using handheld tablet devices on which the online survey was administered. This method provides the benefits of an online survey format, which can provide logic and validation to ensure accurate and complete responses, but does not require the participant to have internet access, which results in a more representative sample.

#### **7. Interviews**

In certain contexts, County Connection staff will interview specific stakeholders to collect information or gain insight on their perspectives.

#### **8. Community-Based Organizations**

CBOs play an important role in public participation. County Connection works with a variety of CBOs, including: ethnic cultural centers; churches and faith-based organizations; geographic-specific such as tenant associations; neighborhood and community groups; civic groups; business

organizations; educational facilities including schools providing English as a Second Language programs; service providers for children, youth, families and persons with disabilities; recreation; environmental; political; youth- and senior-oriented organizations; and many others. Staff work closely with the CBOs to schedule and conduct outreach. The following lists CBOs that County Connection utilizes for outreach.

#### Community Based Organizations

Organization	Address	City	Title VI Group
Monument Corridor Transportation Action Team	1760 Clayton Rd.	Concord	Low-income, minority
The Interfaith Council of Contra Costa County	1543 Sunnyvale Ave.	Walnut Creek	Low-income, minority
Martinez Senior Community Center	818 Green St.	Martinez	Low-income, minority
Los Rancheros Market	1099 Reganti Drive	Concord	Hispanic
La Clínica Monument	2000 Sierra Road	Concord	Hispanic
Envirojustice	2520 Pine St.	Martinez	Low-income, minority
Boys and Girls Club	1301 Alhambra Ave. 1001 Stoneman Ave.	Martinez Pittsburg	Low-income, minority
Contra Costa Child Care Council	1035 Detroit Ave.	Concord	Low-income, minority
Community Development Division	651 Pine St. 5th Floor	Martinez	Low-income, minority
Contra Costa County Employment and Human Services Dept.	40 Douglas Dr.	Martinez	Low-income, minority
Contra Costa County Workforce Development Board	300 Elinwood Way	Pleasant Hill	Low-income, minority
Contra Costa Health Services	50 Douglas Dr.	Martinez	Low-income, minority

Organization	Address	City	Title VI Group
Contra Costa Interfaith Supporting Community Organization (CCISCO)	724 Ferry St.	Martinez	Low-income, minority
Concord Family Service Center	2120 Diamond Boulevard, Suite 220	Concord	Low-income, minority
Concord Senior Center	2727 Parkside Circle	Concord	Low-income, minority
Monument Impact	2699 Monument Blvd	Concord	Low-income, minority
Monument Crisis Center	1990 Market St	Concord	Low-income, minority

## 9. Public Meetings

Public meetings are a way to give out information to a broad segment of the population as well as receive feedback on planning efforts. Such meetings are broadly advertised and open to all stakeholder groups and interested individuals.

Public hearings are the most formal method of public meetings, in which official statements are presented by individual attendees and their comments are recorded. Time limits are often necessary to permit all interested participants to speak. Public hearings allow each individual's perspectives and opinions to be heard by all in attendance. The primary drawback of an official public hearing is that interaction with the public is limited and the structure can be intimidating.

An open house format allows participants to receive information at their own pace, with no strict time period in which they have to arrive at and leave from the location. Information stations can include tabletop displays, maps, photographs, visualizations, and more. Staff is on hand to respond to questions and comments. Because open houses are more informal, disorganization can occur and not everyone's comments may be conveyed or heard. There is often little interaction among participants. Some open houses may include an educational presentation and comment period.

As newspaper readership has fallen, social media has become an ever-growing tool for spreading news and announcements. County Connection frequently updates its Facebook, Twitter, and

website while still releasing bilingual newspaper notices. There is also a Customer Service Center that customers and the general public can call to voice opinions.

Workshops have also been used, allowing for a more hands-on approach than focus group meetings. These public meetings allow for specific groups to directly talk to staff and voice their concerns.

County Connection will utilize various methods of public outreach to ensure that as much participations as possible within target populations are aware of any opportunities for providing input on planning and policy development efforts.

### **10. Public Hearings**

The County Connection Board of Directors adopted a Public Hearing Policy on October 16, 2008 to govern public hearing procedures. In April 2015, the policy was amended to include additional ways to solicit and consider public comments.

All public hearings are to be called by the Board of Directors. However, when authorized by the Chair, the General Manager may call a public hearing that is required by law or by Authority policy when doing so would move the process forward in a timely manner.

#### Necessity of a Public Hearing

The Board may call a public hearing for a variety of reasons. However, prior to implementing a new fare, raising an existing fare, or implementing a major reduction in service, the Authority shall hold a public hearing at which oral and written presentation can be made as part of a duly noticed meeting.

Major reduction in service is defined as:

1. Elimination of 25 percent or more of the number of transit route miles of a bus route; or
2. Elimination of 25 percent or more of the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or
3. Elimination of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.

#### Notice

Notice of the time and place of the meeting shall be published twice in a newspaper that is regularly published at least once a week. As a general rule, the first notice should be published at least 21 days

prior to the hearing and the second notice at least 5 days prior to the last hearing date. Shorter notice may be given when financial, operational or scheduling considerations make it infeasible to provide 21 days' advance notice. At a minimum, the notice must be published at least 10 days prior to the hearing and the second notice at least 5 days prior to the last hearing date.

The notice shall include a general, brief explanation of the matter to be considered. The notice shall also state where and when the staff report or other information about the subject of the hearing will be available for public review.

If specific groups or neighborhoods would be affected by the change, the Authority shall use best efforts to publish the notice in newspapers, if any, oriented to such groups or neighborhoods and to otherwise publicize the hearing to reach such groups or neighborhoods, including publicizing the hearing on the Authority's web site.

#### Conduct of the Public Hearing

At the public hearing, the Authority shall afford any interested person or duly authorized representative, or both, the opportunity to present statements or arguments. Limitations may be established on the length of oral presentations in order to afford all members of the public a reasonable opportunity to speak. The hearing need not be conducted according to the technical rules of evidence. Such hearing may be conducted by staff. Generally, court reporters will not be used. At the close of the public hearing, the General Manager or his/her designee will announce where the item will next be heard, either before a committee or the Board.

#### Other Public Comments

Staff may solicit public comments on the proposed major service change or fare change using other methods in addition to the required public hearing, such as email, phone calls to customer service, mobile apps that collect passenger comments or conduct surveys, blog posts, and workshops.

#### Consideration of Comments

All comments received will be summarized and presented to the Board for their consideration as part of the decision making process.

## D. LANGUAGE ASSISTANCE PLAN

### Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT)) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

**Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter a County Connection service.

**Factor 2:** The frequency with which LEP persons come in contact with County Connection services.

**Factor 3:** The nature and importance of programs, activities or services provided by County Connection to the LEP population.

**Factor 4:** The resources available to County Connection and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the LAP, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

### Purposes of the Language Assistance Plan

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restrict[ing] an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utiliz[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the

effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin.”

FTA Circular 4702.1B details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The DOT published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Given the diversity of Contra Costa County’s population and County Connection’s ridership, it is critical to provide language assistance. County Connection’s LAP complies with the requirements of DOT LEP guidance.

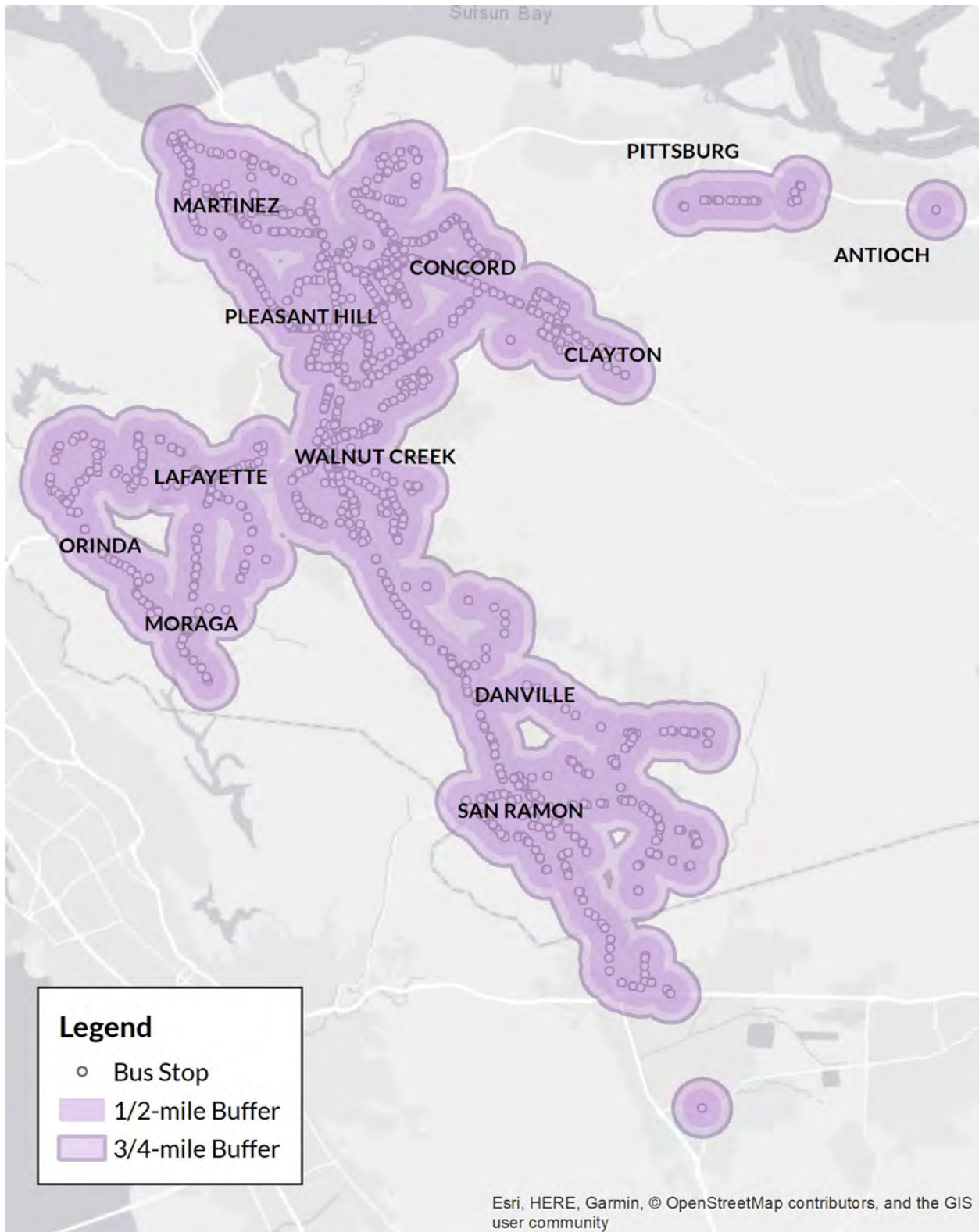
## Four Factor Analysis

### Factor 1:

**The number or proportion of LEP persons in the service area who may be served or are likely to encounter a County Connection service.**

The first step in the Language Assistance Plan development process is to quantify the number of persons in the service area who do not speak English fluently and would benefit from the Language Assistance Plan. The following exhibit illustrates County Connection’s current fixed-route system map along with a ½- and ¾-mile boundaries corresponding with the reasonable distance a customer could be expected to walk to access a County Connection bus.

Bus Stop Walking Distance





### Analysis of Census Data

To identify the concentrations of LEP populations within County Connection's service area, staff analyzed Census data from the American Community Survey (ACS) 2014-2018 5-year Estimates.

Since the last Program Report, there was a change in how the ACS categorizes and aggregates language data due to privacy concerns and small sample sizes. In particular, Census Tract-level summary data has been reduced to reflect the most commonly spoken languages in the United States, and certain groups of spoken languages are now aggregated. Because of this, additional analysis was performed using Public Use Microsample (PUMS) data from the same ACS dataset to provide more detailed breakdowns of language groups. However, due to the more detailed nature of this microdata, it is only available for larger geographic areas, which do not correspond exactly with the Census Tracts that comprise County Connection's service area.

In developing this Language Assistance Plan, County Connection paid particular attention to the Federal Department of Justice (DOJ) guidelines regarding the "Safe Harbor Provision" for translation of written materials. FTA Circular 4702.1B states the following with respect to the Safe Harbor Provision:

*The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

*These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For*

*example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.*

Based on these guidelines, nine language groups have more than 1,000 persons in Central Contra Costa County who speak English less than “very well” and thus require translation of vital documents:

- Spanish
- Chinese
- Korean
- Persian/Farsi
- Tagalog/Filipino
- Russian
- Vietnamese
- Hindi
- Arabic

The following table illustrates the breakdown by language of residents within County Connection’s service area who speak English “very well” or less than “very well” based on ACS summary data. For the purposes of this analysis, staff focused on those residents indicating the spoke English less than “very well.” There are approximately 70,753 residents within the service area who indicated they speak English less than “very well,” representing over 11 percent of the populace.

English Proficiency (ACS summary data)

Language or Language Group	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	443,222	-	-	-
<b>Spanish</b>	78,372	45,342	<b>33,030</b>	<b>5.3%</b>
French, Haitian, or Cajun	2,611	2,305	306	0.0%
German or other West Germanic languages	2,691	2,263	428	0.1%
<b>Russian, Polish, or other Slavic languages <sup>(1)</sup></b>	8,801	5,596	<b>3,205</b>	0.5%
<b>Other Indo-European languages <sup>(1)</sup></b>	28,161	20,385	<b>7,776</b>	1.3%
<b>Chinese (incl. Mandarin, Cantonese)</b>	22,971	12,128	<b>10,843</b>	1.8%
<b>Korean</b>	5,393	2,667	<b>2,726</b>	0.4%
<b>Vietnamese</b>	3,803	1,929	<b>1,874</b>	0.3%
<b>Tagalog (incl. Filipino)</b>	13,880	9,433	<b>4,447</b>	0.7%
<b>Other Asian and Pacific Island languages <sup>(1)</sup></b>	14,873	11,062	<b>3,811</b>	0.6%
<b>Arabic</b>	3,315	2,072	<b>1,243</b>	0.2%
<b>Other and unspecified languages</b>	3,903	2,839	<b>1,064</b>	0.2%
<b>Total</b>	<b>631,996</b>	<b>118,021</b>	<b>70,753</b>	<b>11.4%</b>

**Bold** indicates languages or language groups meeting the "Safe Harbor" criteria

(1) Language group was further analyzed using PUMS data

Source: U.S. Census Bureau, 2014-2018 American Community Survey, Table C16001

As mentioned previously, recent changes to the ACS tables resulted in more languages being grouped together on the Census Tract level, making it difficult to distinguish which specific language(s) meet the "Safe Harbor" criteria. In particular, Persian (Farsi) has historically been

identified as a “Safe Harbor” language but is now grouped under “Other Indo-European languages”, and Russian is grouped with Polish and other Slavic languages. Thus, PUMS data was analyzed to provide a more detailed breakdown by individual language. The following table shows the languages that meet the “Safe Harbor” criteria based on PUMS data.

#### English Proficiency (PUMS data)

Language	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	379,808	-	-	-
Spanish	43,093	24,828	18,265	3.5%
Chinese (incl. Mandarin, Cantonese)	19,894	10,731	9,163	1.8%
Korean	5,158	2,391	2,767	0.5%
Farsi	7,305	4,554	2,751	0.5%
Tagalog (incl. Filipino)	8,193	5,634	2,559	0.5%
Russian	5,758	3,815	1,943	0.4%
Vietnamese	3,090	1,836	1,254	0.2%
Hindi	6,321	5,119	1,202	0.2%
<i>Other languages</i>	37,092	27,931	9,161	1.8%
<b>Total</b>	<b>515,712</b>	<b>86,839</b>	<b>49,065</b>	<b>9.5%</b>

Source: U.S. Census Bureau, 2014-2018 American Community Survey, Public Use Microdata Sample (PUMS)

While some of these groups represent a modest percentage of County Connection’s Service Area population, they do constitute a count of at least 1,000 persons and thus qualify based on the Safe Harbor Provision. It is County Connection’s responsibility to ensure these groups have access to vital documents translated into their language so they can participate in a meaningful way in County Connection’s decision-making process and stay informed regarding County Connection’s business activities. “Vital” written documents include Title VI complaint forms, procedures, notices. These documents must be translated into the identified languages from Factor One and Factor Two in the

next section for Title VI compliance. Translations of these documents are included in Appendix A and Appendix B.

County Connection currently translates most materials into Spanish, which is the only language group constituting a share of more than 5 percent of the population.

#### California Department of Education

In addition to Census data, the Factor 1 analysis considered language data from the California Department of Education (CDE) English Learners Database. Although this data is limited to students and not necessarily reflective of the population as a whole, it provides another means of cross-checking the census data analysis.

The following table provides a breakdown of the languages that are spoken at home by more than 100 English Learners within County Connection’s service area. The most common languages are consistent with those identified previously as “Safe Harbor” languages.

#### English Learners by Language Spoken at Home

Language	English Learners	% of Total Enrollment
Spanish	5,681	6.4%
Mandarin (Putonghua)	432	0.5%
Farsi (Persian)	278	0.3%
Russian	271	0.3%
Arabic	191	0.2%
Korean	180	0.2%
Filipino (Pilipino or Tagalog)	159	0.2%
Telugu	146	0.2%
Cantonese	143	0.2%
Vietnamese	124	0.1%
Hindi	108	0.1%

Language	English Learners	% of Total Enrollment
Portuguese	101	0.1%
Other languages	1,186	1.3%
<b>TOTAL</b>	<b>9,000</b>	<b>10.1%</b>

Source: California Department of Education, 2019-20 English Learners by Grade & Language

## Factor 2:

### **The frequency with which LEP persons come in contact with County Connection services.**

The second step in the analysis is an evaluation of the current frequency of contact between LEP individuals and County Connection's services. This includes a survey of key program areas and major points of contact with the public, such as use of bus service, customer service interactions, and at public meetings.

#### Participation in Public Meetings

During the reporting period, County Connection has held 12 public meetings, in addition to regularly scheduled Board and subcommittee meetings. No individual has requested either an interpreter for a language other than Spanish nor expressed interest in commenting in a language other than English or Spanish.

#### Call Center

To supplement information gathered via the U.S. Census, County Connection analyzed the number of calls coming through its call center which occurred in a language other than English. In 2019, 41,641 total calls were answered. Of calls answered, 39 calls were interpreted via language line call services, with the majority (56 percent) to Spanish. Interpreted calls, however, only represent less than one-tenth of one percent of all calls received and have been decreasing in recent years due to customer service representatives who have been hired with bilingual Spanish proficiency.

#### Call Center Translation Data

Language	Number of Calls Interpreted in 2019
Spanish	22
Arabic	7
Farsi	5
Mandarin	2
Russian	1
Taishanese	1
Amharic	1
<b>Total</b>	<b>39</b>

#### Customer Survey

County Connection conducts a comprehensive survey of its customers across every route in the system every three years. The most recent survey was conducted in October 2019 and asked riders what language they speak at home and how well they speak English. It is critical to note the triennial survey is focused entirely on customers while the Census tracks all county residents. Not only does the survey capture only those who are bus riders, but it also captures those who may live outside of Central Contra Costa County.

The following table shows a breakdown of the survey responses regarding English proficiency. In the survey, 95% of the riding public surveyed stated that they speak only English or that they speak English “very well”. Of the respondents who speak English less than “very well”, just over half speak Spanish.

### English Proficiency of Riders

Language	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	828	-	-	-
Spanish	198	168	30	2.6%
Chinese	30	23	7	0.6%
Tagalog/Filipino	24	22	2	0.2%
Japanese	18	9	9	0.8%
Hindi	13	10	3	0.3%
Persian/Farsi	7	5	2	0.2%
Russian	6	5	1	0.1%
Arabic	5	4	1	0.1%
<i>Other languages</i>	44	40	4	0.3%
<b>Total</b>	<b>1,173</b>	<b>286</b>	<b>59</b>	<b>5.0%</b>

Source: 2019 County Connection On-Board Transit Survey

### Factor 3:

**The nature and importance of services provided by County Connection to the LEP population.**

There are a number of key interaction points with the bus system which could prove problematic for LEP populations:

- County Connection website
- County Connection customer service phone line
- Bus stop signage
- Printed schedules
- Fare payment
- Driver inquiries
- Onboard announcements

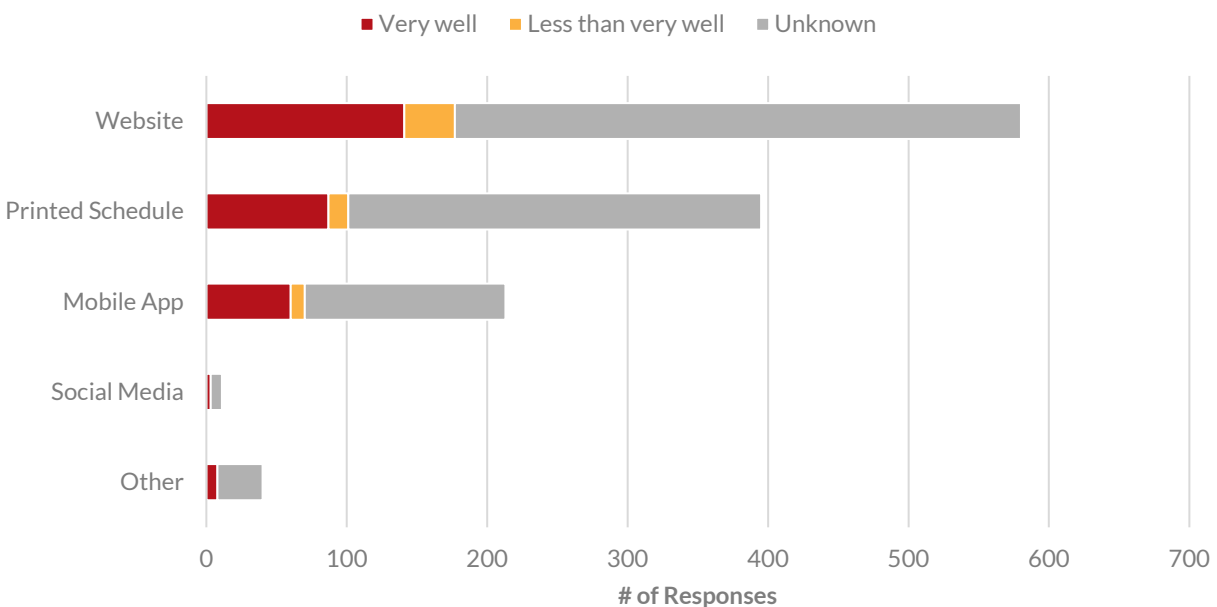


- Social media posts
- Other printed materials

Ensuring that critical information at these interaction points is available in languages commonly spoken is crucial to providing equitable access to County Connection bus service for LEP populations.

The following chart summarizes how riders receive information relating to County Connection's services by English proficiency based on the most recent passenger survey. The website and printed schedules are the main sources of information for riders, although the website is more strongly preferred among those who speak English less than "very well".

#### Information Sources by English Proficiency



While County Connection Customer Service personnel have access to interpretation services and the County Connection website has a tool allowing the website's content to be translated into more than 70 different languages, much of the critical information onboard buses and at the bus stops is not available in many of the languages identified in this document through the Census data and customer surveys.

#### Opportunities for Improvement

Currently County Connection disseminates all information in English, with most information also available in Spanish. Select materials are also available in Chinese. Customer service personnel all speak English, with some speaking Spanish.

Given that as many as nine different languages fall within the federal “Safe Harbor” guidelines, County Connection is obligated to expand the translation of vital materials into the following languages:

- Spanish
- Chinese
- Korean
- Persian/Farsi
- Tagalog/Filipino
- Russian
- Vietnamese
- Hindi
- Arabic

With respect to other languages represented by fewer residents, County Connection currently meets basic requirements for access to information via the Customer Service Language Line and County Connection website translation tool.

Despite the efforts to ensure access to information about its bus service among LEP populations, some key improvements can be made:

- Take into consideration that, according to a local Filipino newspaper, Filipinos may prefer to read materials in English rather than Tagalog.
- Representing Google Translate options on the County Connection website in each respective language rather than listing them all in English. It should also be noted that FTA does not consider Google Translate as a sufficient translation tool for vital documents.
- Locate the Google Translate tool on the County Connection website in a more prominent location (currently located at the bottom right corner of each page).

- Translate printed information disseminated to the public into more languages (currently only translated into Spanish, aside from vital documents). This could include targeted materials for communities in which other languages are commonly spoken.
- Include a standard statement at the bottom of each publication and on certain web pages of the phrase "For information, call 925-676-7500" translated into each safe harbor language.
- Advertise in more media outlets that target languages other than English and Spanish.
- Translate information about fare payment and pass sales into more languages than English and Spanish, and/or use symbols to illustrate key ideas.
- Improve communication with targeted organizations such as Community-Based Organizations (CBOs), Parent Teacher Organizations (PTOs), and schools to ensure that more LEP individuals participate in outreach efforts.
- Provide more bus rider presentations to various organizations, such as CBOs.
- Increase marketing efforts to include social media and traditional media (in various languages) to increase LEP participation at informational outreach events. The placement of multi-language printed materials at bus stops and on buses may be especially critical toward improving information accessibility.

#### Factor 4:

##### **The resources available to County Connection and overall cost to provide LEP assistance.**

County Connection currently has the following language assistance measures in place:

- All of the County Connection web pages may be translated using online tools.
- Customer service staff is trained on how to use the telephone language line for over-the-phone, real-time interpretation services.
- County Connection provides bilingual (Spanish-speaking) staff at public hearings and neighborhood meetings.
- The Customer Service staff for both telephone and in-person assistance includes bilingual (Spanish-speaking) staff.
- All public timetables include a note in Spanish on how to use the language line to get transit information.

- System maps and riders guides are printed in both English and Spanish.

County Connection's Operating Budget does not have a specific line item for providing language access and outreach; costs for interpreters and outsourcing translation needs are split among several different departments depending on which department is responsible for the outreach project being undertaken. Typical annual expenses across all departments are as follows:

- Translation/Interpretation: \$1,500
- Schedules/Graphics: \$70,000
- Market research: \$55,000 every three years

Translated documents include ad cards, direct mailers, bus stop signs, customer brochures, meeting notices, and other customer outreach materials like construction-related notices and information pieces. Most translation is into Spanish, which covers the majority of County Connection's customer base. Materials are translated into additional languages – such as Chinese, Russian, Vietnamese and the other “Safe Harbor” languages as resources allow and circumstances dictate.

County Connection needs additional services to provide more meaningful access to LEP groups. The following are recommendations that can be implemented during the next three years:

- Increased use of universal pictograms at bus stops and on buses.
- Increased translations of documents.
- Conduct more language-specific outreach.
- Provide a short survey regarding LEP needs on buses in various languages for LEP individuals who cannot make it to outreach meetings, where these individuals can voice their concerns and opinions directly to County Connection staff.

## Language Assistance Implementation Plan

### Methodologies

#### Identifying LEP Individuals

*“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis...”*

*-DOT LEP Guidance Section VII(1)*

As indicated in the analyses provided in Factors One and Two in the previous section, there is substantial evidence that there is a significant LEP population within County Connection’s service area.

This population also makes up a considerable portion of County Connection’s customers. County Connection analyzed Census data from 2018 and found that approximately 70,000 residents indicated that they speak English less than “very well,” or 11 percent of the service area population. Nine language groups (Spanish, Chinese, Korean, Persian/Farsi, Tagalog/Filipino, Russian, Vietnamese, Hindi, and Arabic) have more than 1,000 persons who speak English less than “very well” and require a translation of vital documents. Currently County Connection’s only consistently translates most materials into Spanish.

#### Providing Services

*“An effective LEP plan would likely include information about the ways in which language assistance will be provided.”*

*-DOT LEP Guidance Section VII(2)*

County Connection is committed to providing meaningful access to information and services to its LEP customers. Currently County Connection language assistance tools include and are not limited to:

- Google Translate tool on County Connection’s website
- Interpreters (by request) for public hearings
- Multilingual printed materials

- Language Line (for customer service representatives and dispatch personnel to assist passengers using requested language)
- County Connection customer service line

There are additional resources such as smartphones and bilingual staff that provide language assistance to LEP customers, but these are not formally tracked.

Improvements can always be made, and the following are language assistance services that may be provided in the future:

- Improve Google Translate tool to display languages in their original written form (rather than in English) and placing the tool in a more prominent location on the County Connection website.
- Translate more languages in general.
- Make more multilingual social media posts.
- Continue partnering with CBOs to serve more multilingual communities.
- Continue partnering with regional agencies and other partners to produce shared multilingual customer information materials.
- Review existing customer information documents to determine whether the document is “vital” and what level of translation is needed.
- Review current translation, interpretation and language assistance efforts to determine whether they are adequate and/or effective.

“Vital” written documents include complaint forms, written notices of important legal rights, documents that are critical for obtaining services and benefits, documents identifying upcoming fare and service changes, and notices advising LEP individuals of free language assistance. These documents must be translated into the identified languages from Factor One and Factor Two in the previous section for Title VI compliance.

County Connection has translated the following vital documents into the nine “Safe Harbor” languages identified in the analysis:

- Title VI Public Notice,
- Title VI Complaint Procedures, and

- Title VI Complaint Form.

Translations of these documents are included in Appendix A and Appendix B.

### Monitoring

*“Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and to employees.”*

*-DOT LEP Guidance Section VII(5)*

County Connection will monitor on an ongoing basis activities and information that require LEP accessibility. Monitoring methods include:

- Assess new customer information documents prior to production to determine whether the document is “vital” and what level of translation is needed.
- Assess and analyze outreach efforts pertaining to LEP populations.
- Analyze newly available demographic data from the U.S. Census, the ACS, and customer surveys.
- Gather information from CBOs and regional agencies and partners to stay current.
- Analyze data from ridership surveys every three years.

### Recommendations for Implementation

County Connection recognizes the importance of providing adequate accessibility for LEP customers to County Connection services and information. While County Connection currently complies with all federal and state mandates in regards to Title VI and other requirements, more can be done to ensure that LEP populations are provided with the transit services they need and to ensure the communities are satisfied with such services.

Moving forward, County Connection will:

- Expand coordination and partnerships with CBOs, schools, and other organizations to more effectively reach LEP populations.

- Work with Google or other outside translation service(s) to improve County Connection website translations.
- Utilize symbols and other non-written forms of communication to allow for important information to be disseminated to those who are LEP.



## **E. BOARD RESOLUTIONS**

Board Resolutions for the FTA required standards and policies as well as the Board resolution for the approval of the 2021 Title VI Program Update are attached.

## **RESOLUTION NO. 2013-019**

### **Central Contra Costa Transit Authority**

#### **Board of Directors**

\*\*\*

#### **Adoption of Major Service Change, Disparate Impact, and Disproportionate Burden policies required for compliance with Title VI of the Civil Rights Act of 1964**

**WHEREAS**, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 et seq., for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions; and

**WHEREAS**, Title VI of the Civil Rights Act of 1964 requires recipients of Federal grants and other federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to, race, color or national origin; and

**WHEREAS**, the Federal Transit Administration (FTA) issued Circular FTA C 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

**WHEREAS**, as set forth in the above-referenced Circular, the Board of Directors is required to adopt policies to guide the equitable distribution of County Connection services; and

**WHEREAS**, the County Connection is also required to adopt policies to define when a service change is sufficiently broad or large to necessitate a review of its potential impacts on minority and low-income populations, and to define when a fare change or major service change will have a disparate impact on minority populations or impose a disproportionate burden on low-income populations, all of which policies and definitions are required to be subject to public input; and

**WHEREAS**, over the past three months, staff has presented draft policies to the Marketing, Planning, and Legislative Committee and the public through public meetings, and accepted public comment on the policies; and

**WHEREAS**, the General Manager recommends the Board approve the attached definition of "Major Service Change," and Disparate Impact and Disproportionate Burden policies, which comply with FTA requirements and which will guide future decisions regarding and monitoring of County Connection programs and services to ensure they are provided equitably, without discrimination based on race, color or national origin.

**NOW, THEREFORE, BE IT RESOLVED** the Board of Directors of the Central Contra Costa Transit Authority hereby approves the attached definition of "Major Service Change," and Disparate Impact and Disproportionate Burden policies.

Regularly passed and adopted this 20th day of June, 2013 by the following vote:

AYES: Directors Andersen, Haskew, Horn, Hoffmeister, Manning, Schroder and Worth

NOES: Directors Dessayer and Weir

ABSTENTIONS: None

ABSENT: Directors Hudson and Storer



Erling Horn, Chair, Board of Directors

ATTEST:



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Lathina Hill, Clerk to the Board

RESOLUTION NO. 2015-014

CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
BOARD OF DIRECTORS

\* \* \*

AUTHORIZING ADOPTION OF SYSTEM-WIDE  
SERVICE STANDARDS AND POLICIES  
AS REQUIRED BY TITLE VI GUIDELINES

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("County Connection"), a joint exercise of powers agency created under California Government Code Section 6500 et seq., for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions;

WHEREAS, on October 1, 2012, the Federal Transit Administration (FTA) issued a new circular to guide transit agencies and other federal aid recipients in complying with Title VI of the Civil Rights Act of 1964 (Title VI), which ensures that public services, including transportation, are provided in a nondiscriminatory manner;

WHEREAS, in order to comply with the requirements of Title VI and the FTA circular, County Connection must adopt system-wide service standards and policies, and monitor compliance therewith at least once every three years;

WHEREAS, County Connection's next Title VI Program update is due to the FTA in February 2015, which Program must include the results of service monitoring;

WHEREAS, on November 7, 2014, staff presented proposed service standards and policies to the Marketing, Planning and Legislative Committee, which recommended Board of Directors approval of the Service Standards and Policies in the form attached as Attachment A;

WHEREAS, some of the proposed standards and policies reflect existing County Connection policies, some reflect updates to existing policies, and some are entirely new; and,

WHEREAS, to the extent these standards and policies are inconsistent with existing policies, the new standards and policies would supersede existing policies for purposes of Title VI monitoring only.

NOW, THEREFORE, BE IT RESOLVED that the Central Contra Costa Transit Authority Board of Directors hereby adopts the System-wide Service Standards and Policies attached hereto as Attachment A; and

BE IT FURTHER RESOLVED that, to the extent new these standards and policies are inconsistent with existing County Connection policies, the new standards and policies would supersede existing policies for purposes of Title VI monitoring only.

Regularly passed and adopted this 18th day of December, 2014 by the following vote.

AYES: Directors Andersen, Dessayer, Hoffmeister, Manning, Schroder, Simmons,  
Storer, Tatzin and Weir

NOES:

ABSTAIN:

ABSENT: Directors Hudson and Worth

ATTEST:



Lathina Hill, Clerk to the Board

  
A.G. Dessayer, Chair, Board of Directors

**RESOLUTION NO. 2022-011**

**BOARD OF DIRECTORS, CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
STATE OF CALIFORNIA**

**\* \* \***

**ADOPTING THE CCCTA 2021 TITLE VI PROGRAM REPORT**

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 *et seq.*, for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions;

WHEREAS, Title VI of the Civil Rights Act of 1964 requires recipients of federal grants and other assistance to operate their programs and services without regard to, or discrimination based on, race, color or national origin;

WHEREAS, the Federal Transit Administration (FTA) issued Circular FTA C 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance;

WHEREAS, the above-referenced Circular details required elements of a Title VI Program Report, which each recipient of FTA grants and assistance must submit to the FTA every three years to evidence compliance with Title VI;

WHEREAS, CCCTA's current Title VI Program expires on in 2021, therefor necessitating submittal of an updated program report to the FTA;

WHEREAS, staff has developed a proposed Title VI Program Report (provided to the Board via staff report), evidencing CCCTA's compliance with Title VI, for Board consideration and approval; and

WHEREAS, the Marketing, Planning & Legislative Committee has recommended the Board adopt the proposed Title VI Program.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Central Contra Costa Transit Authority hereby adopts the CCCTA 2021 Title VI Program as set forth in the CCCTA Title VI Program Report; and

BE IT FURTHER RESOLVED that the Board of Directors authorizes the General Manager, or his designee, to:

1. Include evidence of the Board's consideration and approval of the CCCTA Title VI Program in the final CCCTA Title VI Program Report;
2. Submit the final CCCTA Title VI Program to the FTA; and
3. Take any other steps necessary to give effect to this Resolution, including responding to any follow-up inquiries from the FTA.

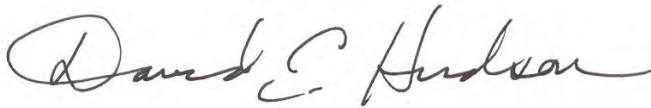
Regularly passed and adopted this 21st day of October, 2021 by the following vote:

AYES: Directors Andersen, Haydon, Hudson, Schroder, Sos, Storer, Tatzin, Wilk and Worth

NOES: None

ABSTENTIONS: None

ABSENT: Directors Hoffmeister and Noack

A handwritten signature in black ink, reading "Dave E. Hudson".

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Dave Hudson, Chair, Board of Directors

ATTEST:

A handwritten signature in blue ink, reading "Lathina Hill".

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Lathina Hill, Clerk to the Board

## F. TITLE VI POLICIES, SERVICE STANDARDS & POLICIES

Federal Title VI requirements of the Civil Rights Act of 1964 were updated by the FTA in 2012 to require each large public transportation provider's governing board to approve five standards and policies:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy
- System-wide Service Standards
- System-wide Service Policies

These standards and policies were developed to ensure that service is provided in a manner that does not discriminate on the basis of race, color, or national origin. The first policy defines "major service change" as a threshold for when an agency will conduct a thorough analysis of the potential effects of service changes on protected populations. For the second and third policies, agencies are required to define thresholds for when they will find that a fare change or major service change will result in a "disparate impact" on the minority population or a "disproportionate burden" on the low-income population. The last two policies define system-wide service standards and policies to be used to ensure that service and amenities are distributed equitably and do not result in discrimination against protected populations.

County Connection's Major Service Change Policy, Disparate Impact Policy, and Disproportionate Impact Policy were adopted by the Board of Directors on June 20, 2013. County Connection's System-wide Service Standards and Policies were adopted by the Board of Directors on December 18, 2014. See Appendix E for Board resolutions.

### Major Service Change Policy

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the County Connection Board of Directors for its consideration.

County Connection defines a major service change as:

- An increase or decrease of 25 percent or more to the number of transit route miles of a bus route; or
- An increase or decrease of 25 percent or more to the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or.
- A change of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.

Changes shall be counted cumulatively, with service changes being “major” if the 25 percent change occurs at one time or in stages, with changes totaling 25 percent over a 12-month period.

The following service changes are exempted from this 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), as long as the service will be/has been operated for no more than twelve months.
- County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.



## Disparate Impact Policy

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. Per FTA Circular 4702.1B:

*Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...*

*The policy shall establish a threshold for determining when adverse effects of [fare/] service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.*

In the course of performing a Title VI Equity Analysis, County Connection must analyze how the proposed action would impact minority as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, County Connection must evaluate whether there is an alternative that has a more equitable impact. Otherwise, County Connection 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 and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold to determine if the adverse impacts of a major service change or a fare adjustment is established at 20 percent 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.

## Disproportionate Burden Policy

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate

Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

*The policy shall establish a threshold for determining when adverse effects of [fare/]service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.... The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission.... At the conclusion of the analysis, if the transit provider finds that low-income populations will bear a disproportionate burden of the proposed fare[/service] change, the transit provider should take steps to avoid, minimize, or mitigate impacts where practicable. The transit provider should describe alternatives available to low-income populations affected by the fare[/service] changes.*

The County Connection Disproportionate Burden Threshold to determine if the adverse impacts of a major service change or a fare adjustment is established at 20 percent 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.

## System-wide Service Standards

Pursuant to requirements set forth in The Federal Transit Administration's (FTA) Circular 4702.1B County Connection must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by County Connection for other purposes.

The FTA requires all fixed-route transit providers to develop quantitative standards for the following indicators:

1. Vehicle Load
2. Vehicle Headways
3. On-time Performance
4. Service Availability

### Vehicle Load

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

*Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.*

County Connection calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the fleet's average seating capacity. Vehicle Load Factor is monitored regularly and used to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns.

#### Standard:

County Connection has implemented a maximum Vehicle Load Factor of 1.25 during peak and 1.00 during off-peak times.

## Vehicle Headway

Vehicle headway is described as follows by FTA Circular 4702.1B:

*Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.*

County Connection calculates headway by determining the average length of time between buses on each route. In the event a route regularly exceeds Vehicle Load Factor standards, County Connection will evaluate whether headways should be reduced within the confines of funding levels.

### Standard:

County Connection has implemented a maximum vehicle headway standard of 2-hours.

## On-Time Performance

On-time performance is described as follows by FTA Circular 4702.1B:

*On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system.*

County Connection defines a bus as late if it departs the “time point” five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure.

Standard:

County Connection has adopted on-time performance goals that are based on service type: 87 percent for local routes, 75 percent for express routes, and 80 percent for select and weekend routes. On-time performance is tracked and included within monthly performance reports to the County Connection’s Board of Directors.

## Service Availability

Service availability/transit access is described as follows by FTA Circular 4702.1B:

*Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.*

County Connection will determine transit availability by mapping all active bus stops within the system and then calculating the population that resides within three-quarter mile radii of those stops. This information is then compared to the total service area population.

Standard:

County Connection has implemented a goal of ensuring 70 percent of residents within County Connection’s service area live within three quarters (0.75) of a mile from a bus stop.

## Systemwide Service Policies

The FTA requires fixed-route transit providers to develop a policy for each of the following service indicators:

1. Vehicle Assignment
2. Transit Amenities

These policies were developed to ensure that vehicles and transit amenities are distributed equitably across the system and do not result in discrimination against protected populations. They differ from service standards in that they are not based on meeting a quantitative threshold, but rather qualitative evaluation results.

## Vehicle Assignment

Vehicle assignment is described as follows by FTA Circular 4702.1B:

*Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods.*

County Connection currently has three general types of buses in the fleet, all of which are maintained at a single depot and to the same strict standards:

- 29-foot heavy-duty transit buses
- 35-foot heavy-duty transit buses
- 40-foot heavy-duty transit buses

### Policy:

All buses have the same level of amenities (i.e., air conditioning, wheelchair lifts, automated stop announcements), available to riders. Buses are not assigned to specific communities within County Connection's service area based on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths based on street limitations and average loads. Many of the routes serve multiple communities with diverse populations. Given County Connection's strict standards with respect to maintenance, age does not serve as a viable proxy for diminished quality.

## Transit Amenities

Transit amenities are described as follows by FTA Circular 4702.1B:

*Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.*

### Policy:

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

Staff seeks to distribute benches and shelters to match the distribution of minority Census tracts.

## G. DEMOGRAPHIC & SERVICE PROFILE

County Connection's service area is the central portion of Contra Costa County and includes the cities of Concord, Pleasant Hill, Martinez, Walnut Creek, Clayton, Lafayette, Orinda, Moraga, Danville, and San Ramon. Segments of some routes operate within Alameda County. However, for the purposes of this analysis, the service area consists of only Census block groups within Contra Costa County.

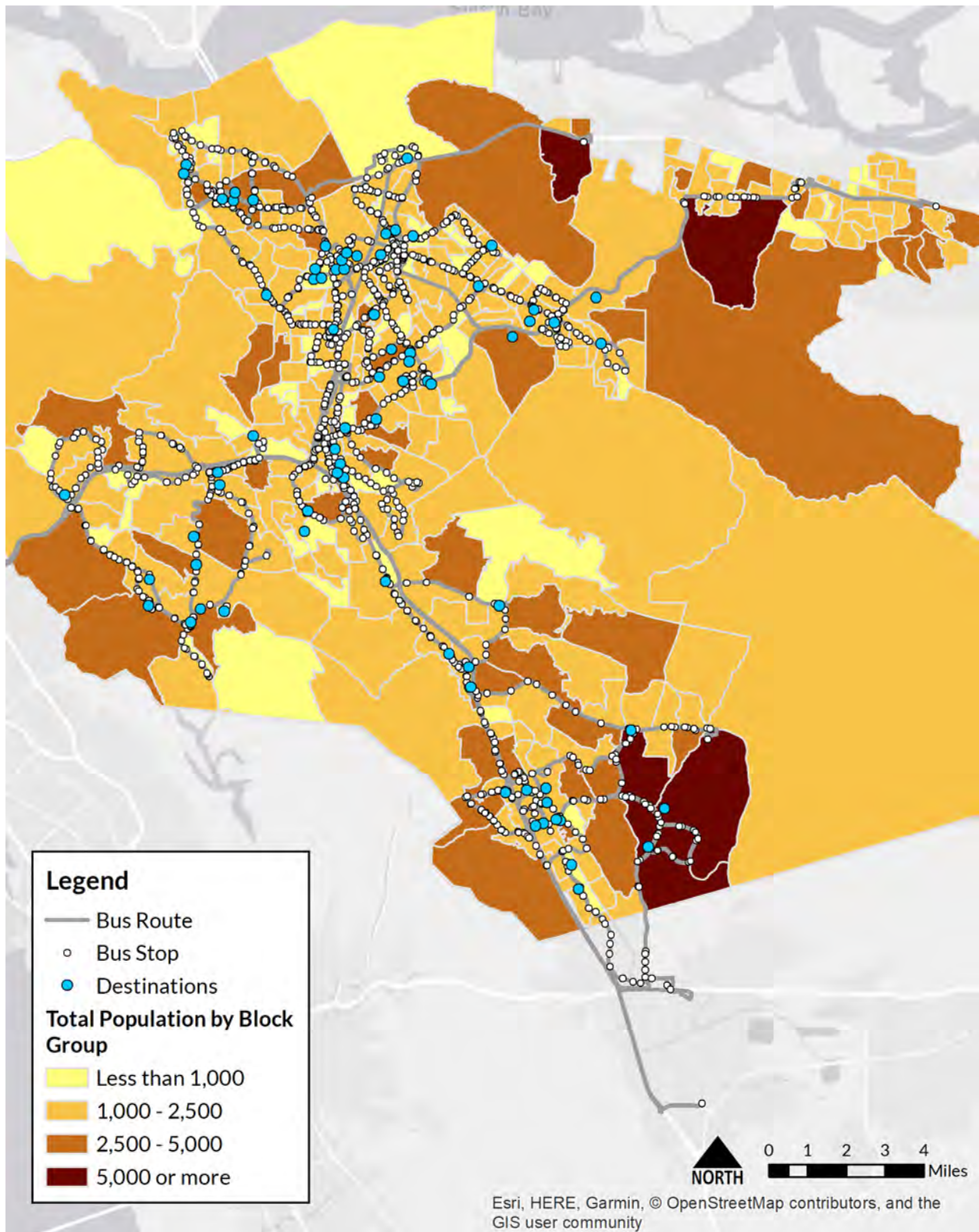
The following maps show County Connection's service area, along with demographics based on Census data from the 2015-2019 ACS 5-year Estimates. This analysis uses the following definitions:

- **Minority** – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.
- **Low-Income** – FTA defines a low-income person as a person whose household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. However, FTA encourages the use of any locally developed threshold provided that the threshold is at least as inclusive as the HHS poverty guidelines. Due to the area's higher cost of living, County Connection defines low-income as at or below 150% of the federal poverty level.

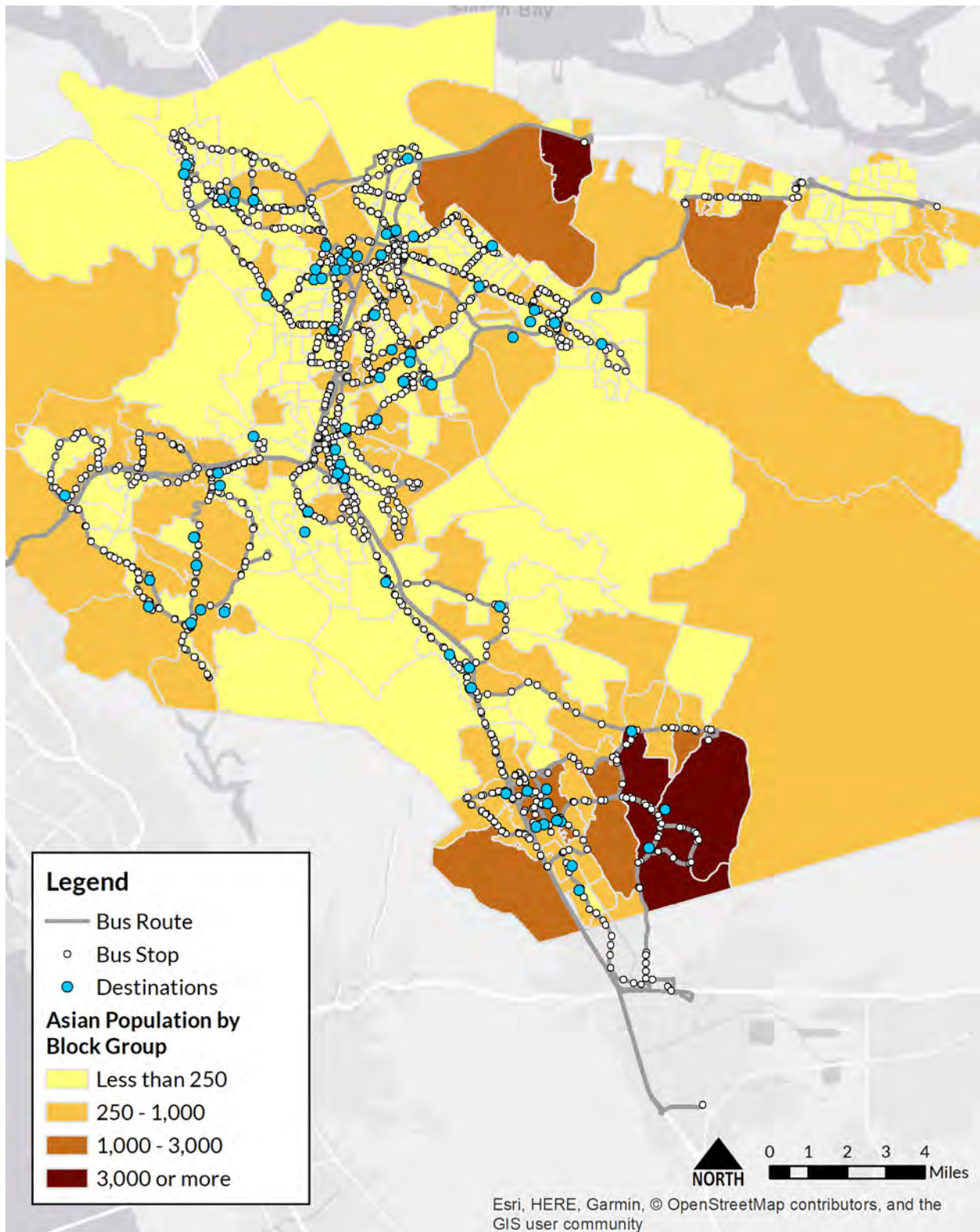
Based on Census data, 46.8% of the overall population within County Connection's service area identifies as minority, and 11.6% of households are considered low-income. Block groups where the proportion of minority or low-income population is equal to or greater than the percentage for the service area as a whole are categorized as minority or low-income block groups, respectively.



Total Population by Census Block Group

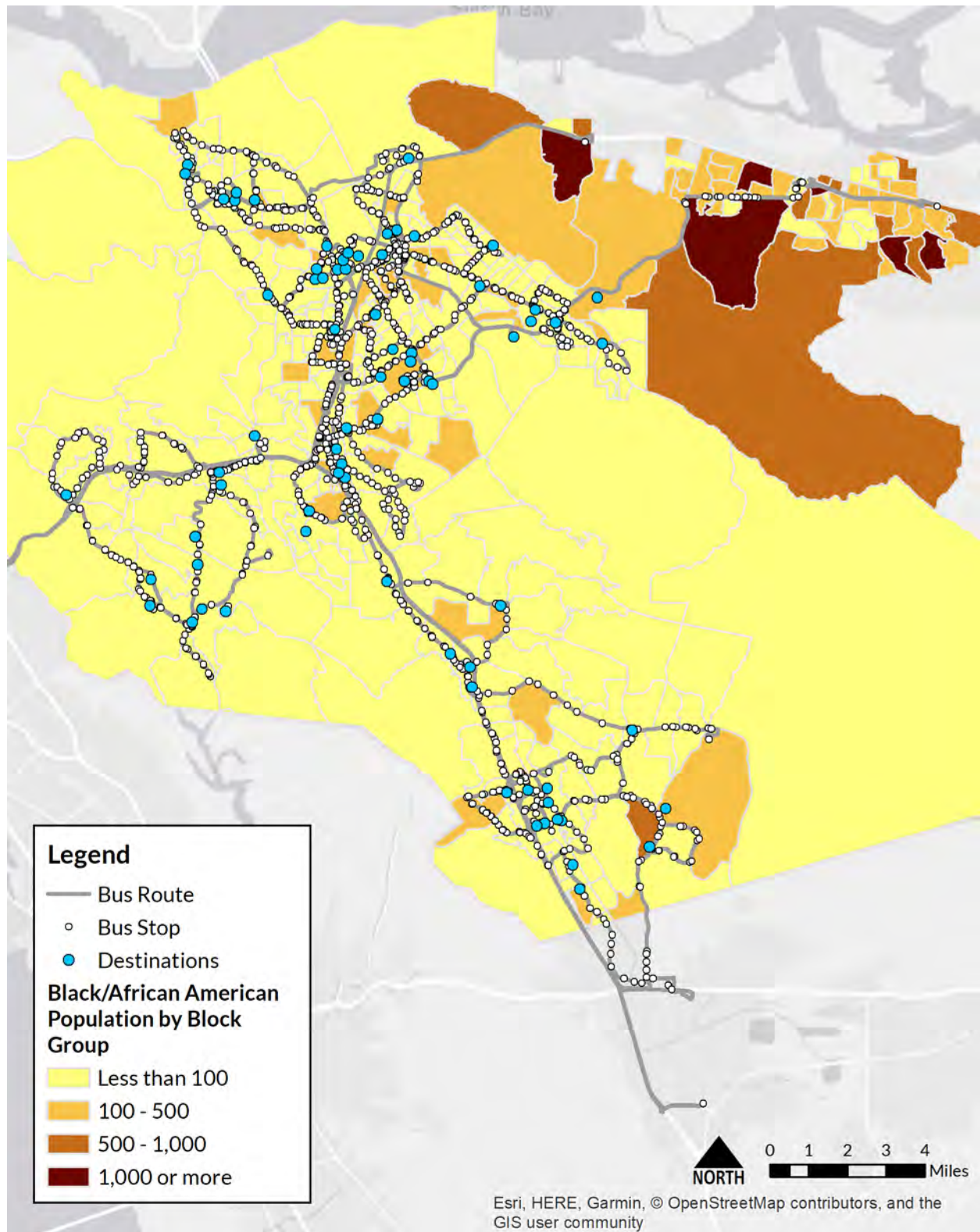


Asian Population by Census Block Group

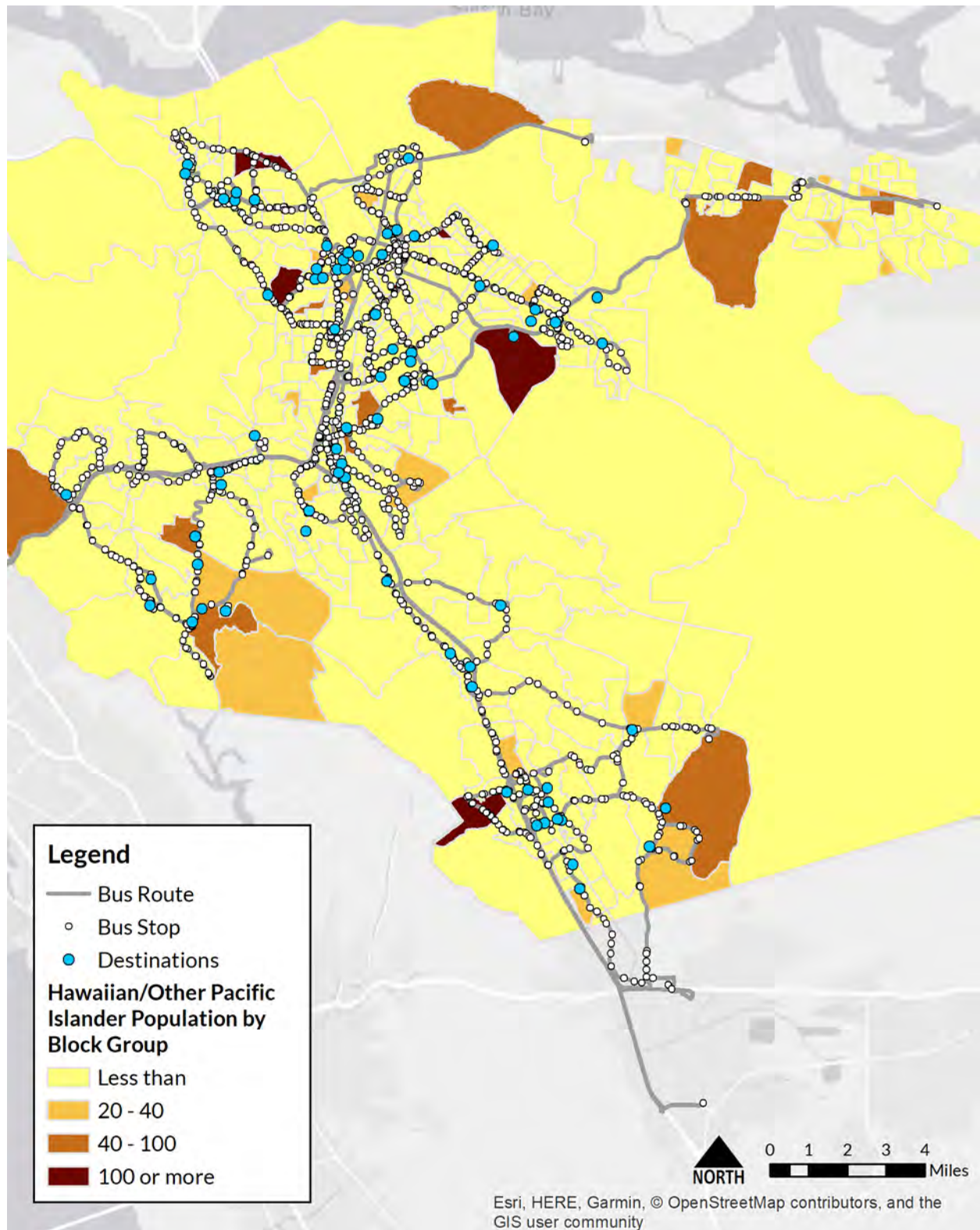




Black Population by Census Block Group

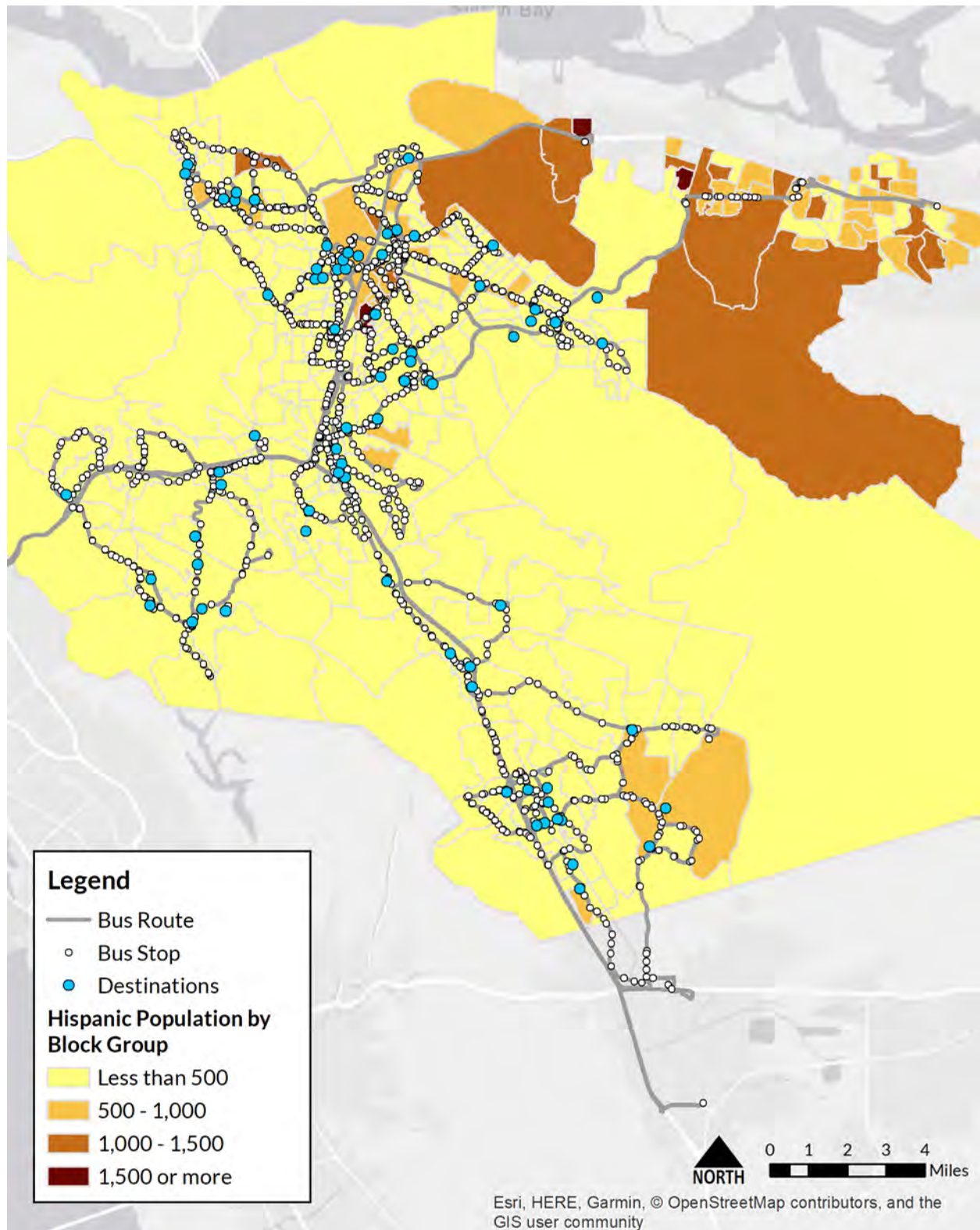


Hawaiian/Pacific Islander Population by Census Block Group

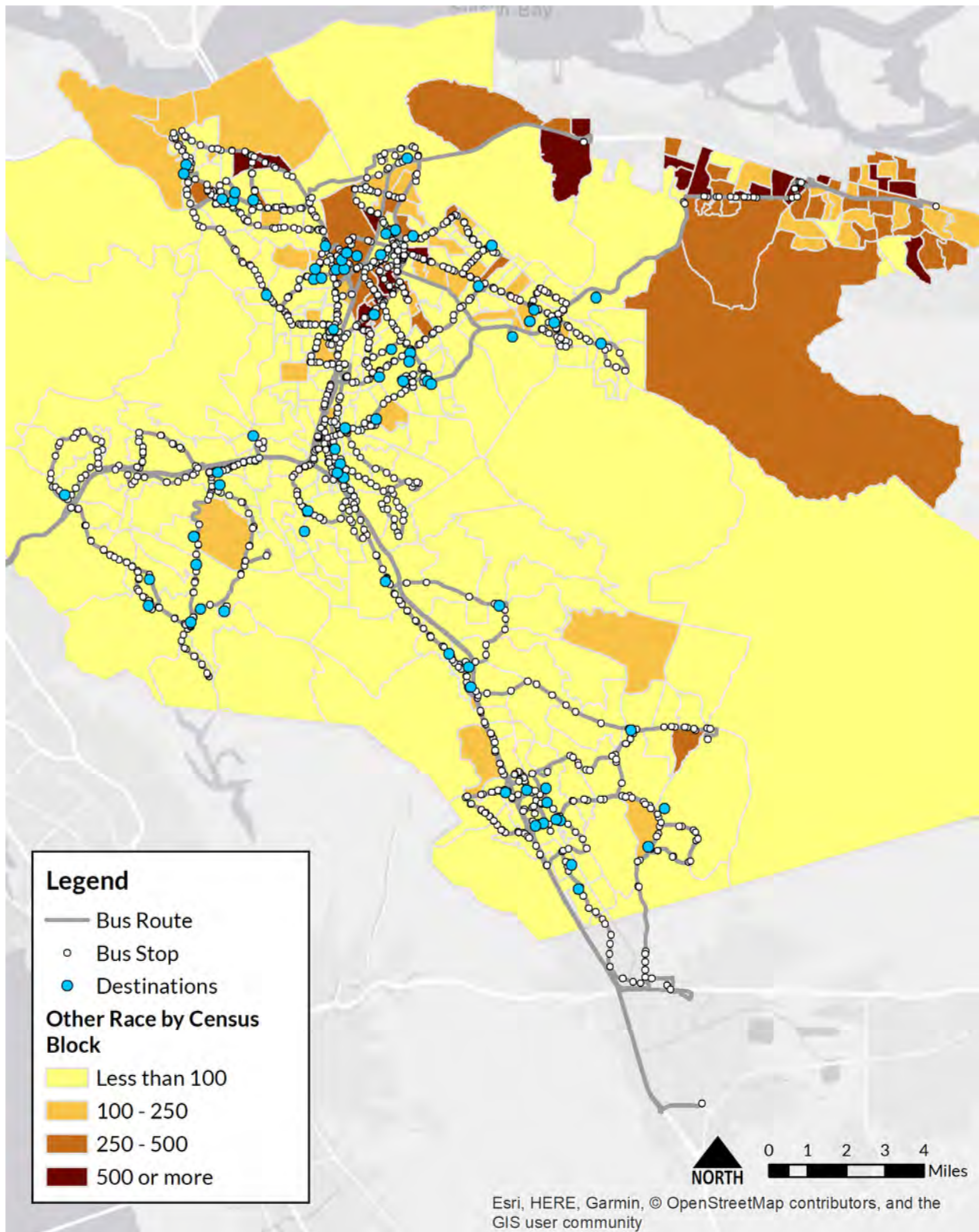




Hispanic Population by Census Block Group

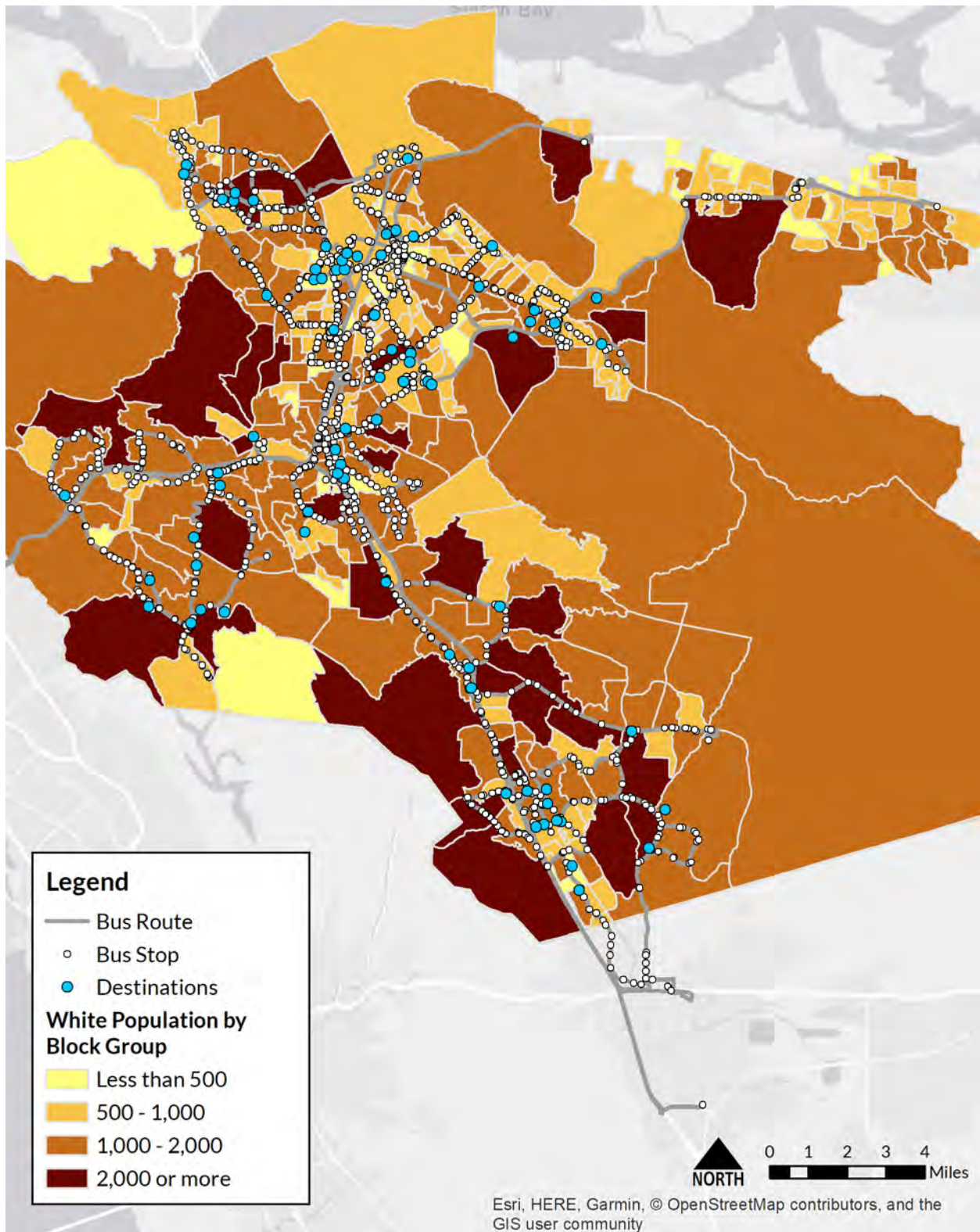


“Other Races” Population by Census Block Group

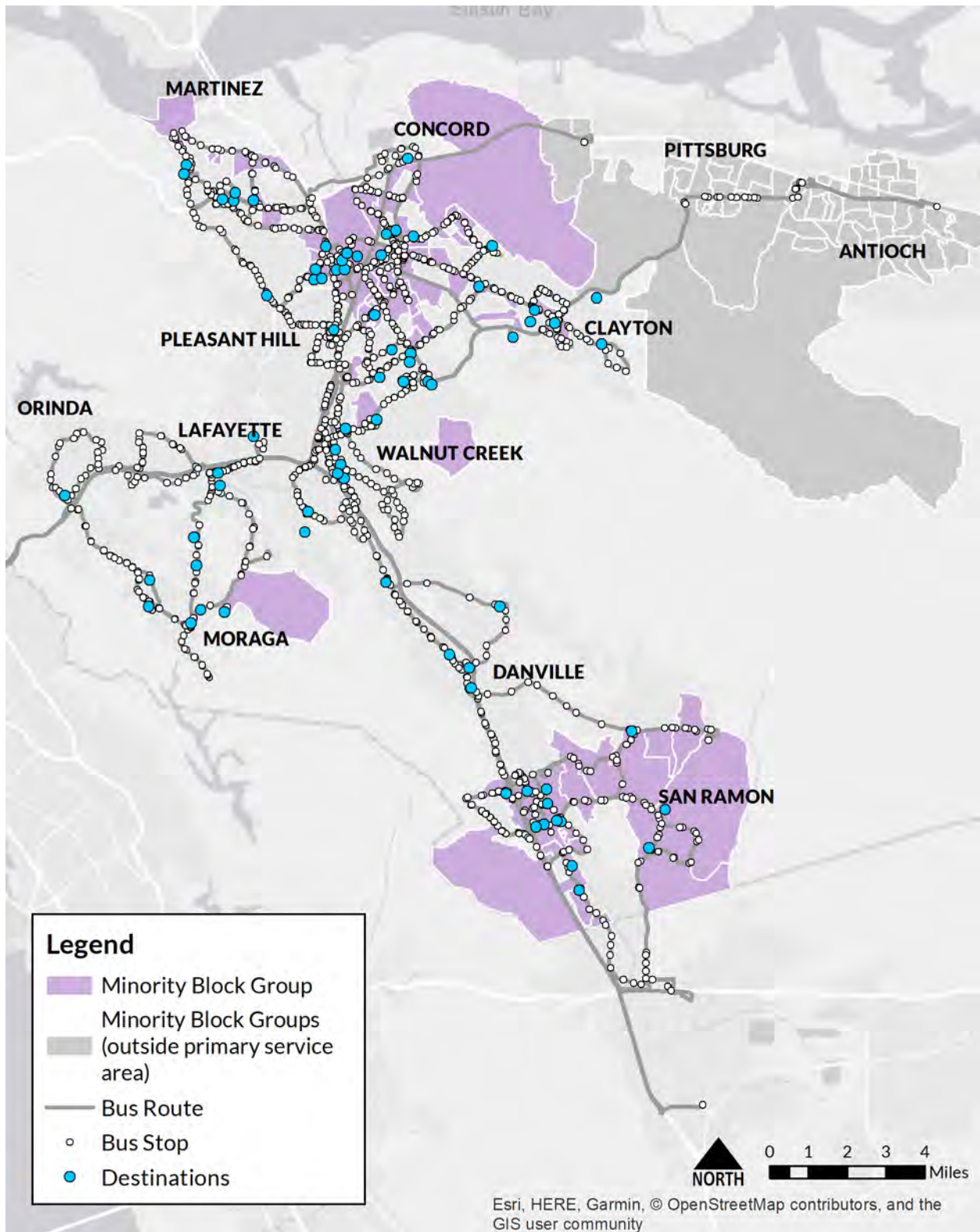




White Population by Census Block Group

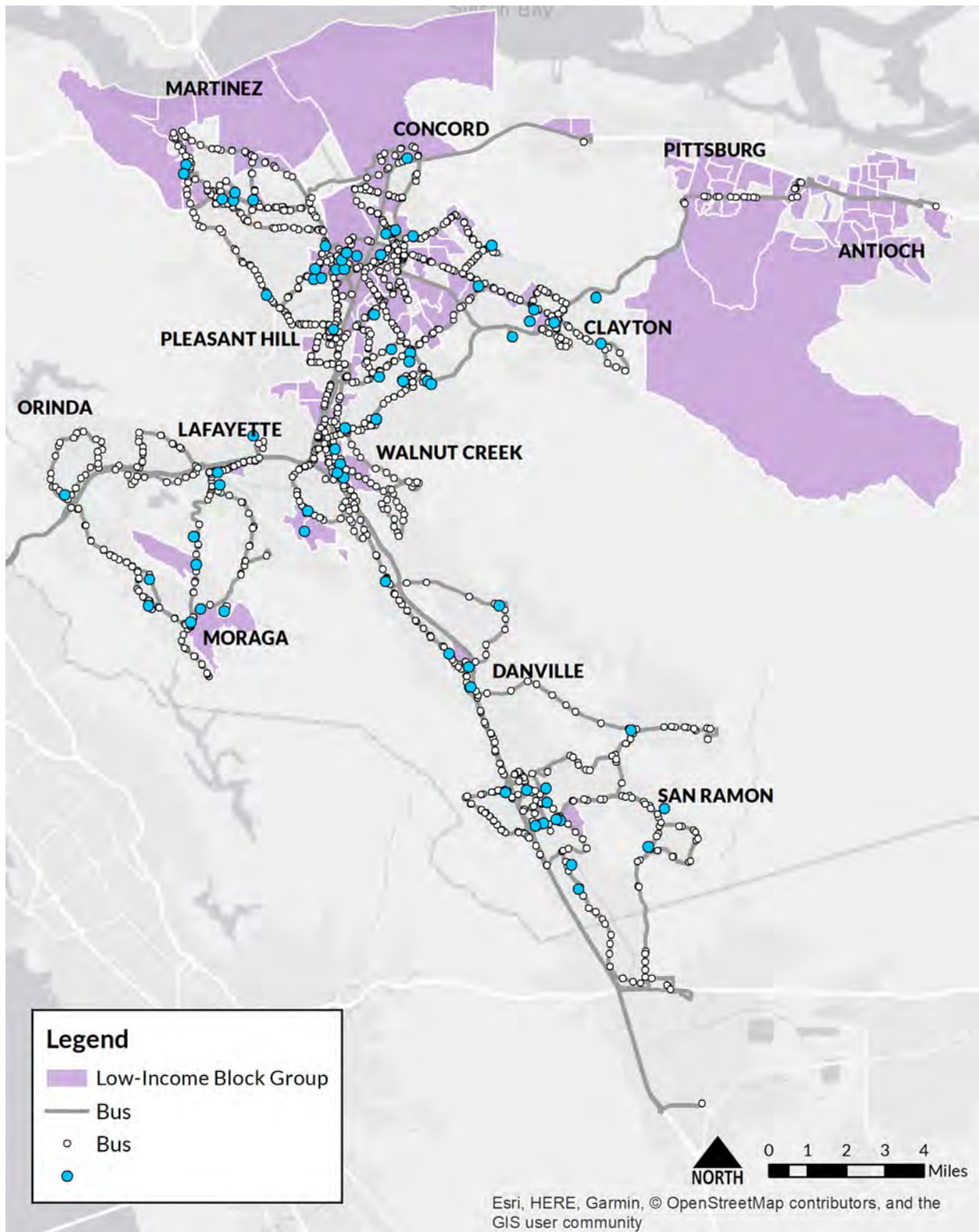


### Minority Block Groups





Low-Income Block Groups



## H. RIDERSHIP & TRAVEL PATTERNS

Passenger surveys are conducted system-wide every three years using a market research firm. The purpose of the survey is to collect customer demographic information, such as race/ethnicity, English proficiency, and income, as well as trip information, such as origin and destination and trip purpose.

Traditionally, paper surveys are distributed on-board vehicles and collected by surveyor staff. The results are entered, cleaned, and compiled in a succinct report by the contractor. County Connection's most recent survey, however, was conducted in person using handheld tablet devices. This method provided more accurate responses and eliminated the need for manual data entry, which can introduce errors. The complete dataset (along with a report) was provided to County Connection to use at its discretion.

The executive summary from the most recent survey conducted in October 2019 is attached.

## EXECUTIVE SUMMARY

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The Central Contra Costa Transit Authority (County Connection) conducted a 2019 Transit On-Board Survey in partnership with Metropolitan Transportation Commission (MTC). MTC contracted with ETC Institute to conduct the On-Board Survey of County Connection passengers. This report will provide an overview and detailed description of the 2019 Transit On-Board Survey process. The report covers the on-board survey results, survey methodology and administration, and the quality assurance/quality control data review process.

In addition to the full on-board survey conducted on weekdays, a sampling of weekend surveys were collected. The weekend data was summarized and is included in Appendix A.

## OBJECTIVES

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The primary objectives for the survey were as follows:

- Compile statistically accurate information about County Connection Passengers and how they use transit in the region.
- Generate reliable linked OD data to support computerized travel demand modeling and transportation network simulation activities for purposes of regional long-range transportation planning.
- Acquire demographic data to meet Title VI Civil Rights Act federal compliance requirements.

## SURVEY METHODOLOGY SUMMARY

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ETC Institute interviewers conducted the On-Board Survey on a representative sample of County Connection routes. The survey was conducted on both weekdays and weekends, using separate sampling plans and collection goals for each. The passenger-intercept interviews were completed using hand-held tablet personal computers (PC) upon which the online survey, created and developed by ETC Institute in cooperation with County Connection and MTC, was administered. Passengers were selected for participation using a random sampling application built into the survey program itself, and passenger responses were captured in real time. ETC Institute interviewers were required to adhere strictly to the random sampling protocol and were at no time permitted to exercise personal discretion with regard to the selection of survey participants.

For those passengers who elected to participate, the survey was administered in two uninterrupted sections: the first was designed to create a detailed record of the passenger's current one-way trip; the second to gather required demographic data. In the initial section, the tablet PC's survey mapping features allowed for geo-coding of addresses using information provided by the passenger. Passengers were able to see each on-screen map and confirm the accuracy of the trip data collected. At the end of the survey's first section, passengers were asked to confirm a comprehensive summary of their complete one-way trip. In the demographics section, passengers were offered the choice of physically selecting the answers themselves - actually pressing the options on the tablet PC screen - to ensure their privacy or providing the information for the interviewer to record their responses. Upon completion of the survey, minimal passenger contact information was collected, and passengers were thanked for their time and willingness to participate.

ETC Institute interviewers were available to answer passenger questions, the most common of which involved the need to ask for personal information, and how the information gathered would ultimately be used. Passengers were assured all information collected would be kept strictly confidential, that County Connection intended to use the information for research purposes designed to improve their system, and that the information would never be used for any commercial purpose.

## TRANSIT TRIP CHARACTERISTICS

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The following bullets describe weekday County Connection Passengers' transit trip characteristics:

- Half (49.77%) of all passenger trips surveyed were either home-to-work or work-to-home trips, while seventeen percent (16.59%) of all passenger trips involved either going to or coming from school (K-12 or College/University).
- Eighty-eight percent (87.51%) of passengers responding to the survey reported walking to access transit. Twelve percent (11.58%) reported using a vehicle of some sort, either driving or getting dropped off, to access transit.
- Fifty-one percent (50.71%) of all County Connection passengers had trips that did not require any transfers on any public transit to complete their one-way trip (using any agency's public transit). Forty-one percent required one transfer (41.34%), and eight percent required two or more transfers (7.95%).
- Seventy-eight percent (78.23%) of all County Connection passengers used Clipper to pay for their one-way trip, while another twenty-two percent (20.54%) indicated they used Cash or Paper.

## TRANSIT RIDER PASS/PAYMENT CHARACTERISTICS

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The following bullets describe weekday County Connection passengers' payment and fare characteristics:

- The majority of County Connection passengers indicated they used the "Adult" fare category for riding (70.34%), compared to the next highest, "Free" (23.63%).
- "By Clipper" was the most widely used fare payment type as indicated by passengers (78.23%), compared to the next highest, "By Cash or Paper" (20.54%).
- Nearly one quarter of respondents (23.63%) saw either a slight or significant improvement to County Connection services while thirty-two percent (32.03%) saw no change in County Connection services.
- The majority of County Connection passengers get schedule information using the County Connection Website at forty-eight percent (47.93%).

## TRANSIT RIDER PROFILE

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The following bullets describe weekday County Connection passengers' demographics:

- Sixty-nine percent (67.75%) of County Connection passengers are employed.
- Eighteen percent (17.89%) of passengers indicated they were a student either part- or full-time at a college university, while an additional three percent (2.97%) indicated they were a K-12 student.
- Twenty-one percent (21.39%) of respondent's indicated they are under the age of 25.
- The race/ethnicity of County Connection passengers in the region are: White (44.72%), Latino / Hispanic (18.76%), Black / African American (18.25%), Asian (14.42%), Hawaiian / Pacific Islander (2.09%), and Other (2.52%).
- Forty percent (39.94%) of County Connection passengers reported an annual household income of less than \$50,000 and ten percent (9.92%) reported an annual household income of \$75,000 or more.

# I. MONITORING PROGRAM RESULTS

## System-Wide Service Standards

Pursuant to requirements set forth in FTA Circular 4702.1B, County Connection must establish and monitor its performance using quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service.

Some standards are defined with regards to peak and off-peak hours. Peak hours are 6:00 a.m. to 8:59 a.m. and 4:00 p.m. to 7:59 p.m., intervals during which ridership tends to be highest. Off-peak hours are any times that are not within the peak hour ranges.

## Route Designations

As part of the Title VI service monitoring and evaluation process, each bus route is designated as either a “minority route” or a “non-minority route.” Per FTA Circular 4702.1B:

*Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.*

County Connection utilized Census data from the 2015-2019 ACS 5-year Estimates supplemented with its triennial customer survey data to classify routes as minority or non-minority. In addition, a similar analysis was performed to also classify routes as either a “low-income route” or a “non-low income route.”

Based on Census data, 46.8% of the overall population within County Connection’s service area identifies as minority, and 11.6% of households are considered low-income. Block groups where the proportion of minority or low-income population is equal to or greater than the percentage for the service area as a whole are categorized as minority or low-income block groups, respectively. Any route with at least a third of its revenue miles within a minority block group is designated as a minority route, and any route with at least a third of its revenue miles within a low-income block

group is designated as a low-income route. Based on this analysis, a total of 16 routes are minority routes and 22 routes are low-income routes.

Additional minority and low-income routes were identified using on-board passenger survey data in recognition that the surrounding geographic area of a route is not always reflective of the ridership demographics of that route. Any routes wherein a higher percentage of riders identified themselves as minority than the system average of 56.1% are categorized as minority routes, and any routes with more than the system average of 44.4% of riders who are considered low-income are categorized as low-income routes. Based on this analysis, an additional 5 routes are designated as minority routes, and an additional 4 routes are low-income routes.

Based on a combination of these two methodologies, a total of 21 routes are designated as minority routes, and 26 routes are low-income routes. These designations are shown in the following table and maps.

#### Minority and Low-Income Route Designations

Route	% Mileage in Minority Block Group	% of Minority Riders	Minority Route	% Mileage in Low Income Block Group	% of Low Income Riders	Low Income Route
<b>Local Routes</b>						
1	5.1%	48.3%		4.8%	<b>58.3%</b>	yes
4	0.0%	<b>56.6%</b>	yes	<b>36.8%</b>	<b>60.9%</b>	yes
5	18.9%	55.0%		<b>54.5%</b>	33.3%	yes
6	2.1%	53.3%		9.0%	<b>50.0%</b>	yes
7	2.8%	<b>62.9%</b>	yes	10.0%	33.3%	
9	22.7%	<b>57.6%</b>	yes	<b>44.2%</b>	36.7%	yes
10	<b>38.7%</b>	<b>63.8%</b>	yes	28.3%	<b>49.3%</b>	yes
11	<b>46.6%</b>	<b>58.3%</b>	yes	<b>51.9%</b>	41.7%	yes
14	<b>38.4%</b>	<b>65.8%</b>	yes	<b>40.6%</b>	<b>59.0%</b>	yes



**TITLE VI PROGRAM REPORT**  
I. Monitoring Program Results

Route	% Mileage in Minority Block Group	% of Minority Riders	Minority Route	% Mileage in Low Income Block Group	% of Low Income Riders	Low Income Route
15	24.0%	50.0%		<b>40.5%</b>	<b>67.9%</b>	yes
16	28.5%	51.5%		<b>43.2%</b>	25.0%	yes
17	<b>48.8%</b>	<b>65.4%</b>	yes	<b>50.1%</b>	<b>60.0%</b>	yes
18	31.4%	50.0%		<b>34.1%</b>	<b>70.8%</b>	yes
19	<b>64.0%</b>	<b>75.0%</b>	yes	<b>55.5%</b>	<b>66.7%</b>	yes
20	<b>89.1%</b>	<b>56.6%</b>	yes	<b>87.8%</b>	25.6%	yes
21	15.0%	46.7%		14.4%	<b>52.2%</b>	yes
27	22.4%	--(1)		<b>77.6%</b>	--(1)	yes
28	26.6%	53.8%		<b>34.8%</b>	<b>60.9%</b>	yes
35	<b>82.0%</b>	<b>66.0%</b>	yes	1.6%	17.9%	
<b>Express Routes</b>						
91X	<b>84.0%</b>	42.9%	yes	<b>80.9%</b>	<b>50.0%</b>	yes
92X	27.6%	22.2%		4.6%	0.0%	
93X	<b>51.1%</b>	31.3%	yes	<b>37.8%</b>	43.8%	yes
95X	12.8%	<b>57.9%</b>	yes	6.3%	17.6%	
96X	21.3%	53.2%		6.3%	26.8%	
97X	<b>91.7%</b>	<b>60.0%</b>	yes	0.0%	30.0%	
98X	29.8%	54.2%		<b>44.8%</b>	15.4%	yes
99X	32.3%	40.0%		<b>43.1%</b>	40.0%	yes
<b>Weekend Routes</b>						
310	<b>38.7%</b>	43.5%	yes	28.3%	43.8%	



**TITLE VI PROGRAM REPORT**  
I. Monitoring Program Results

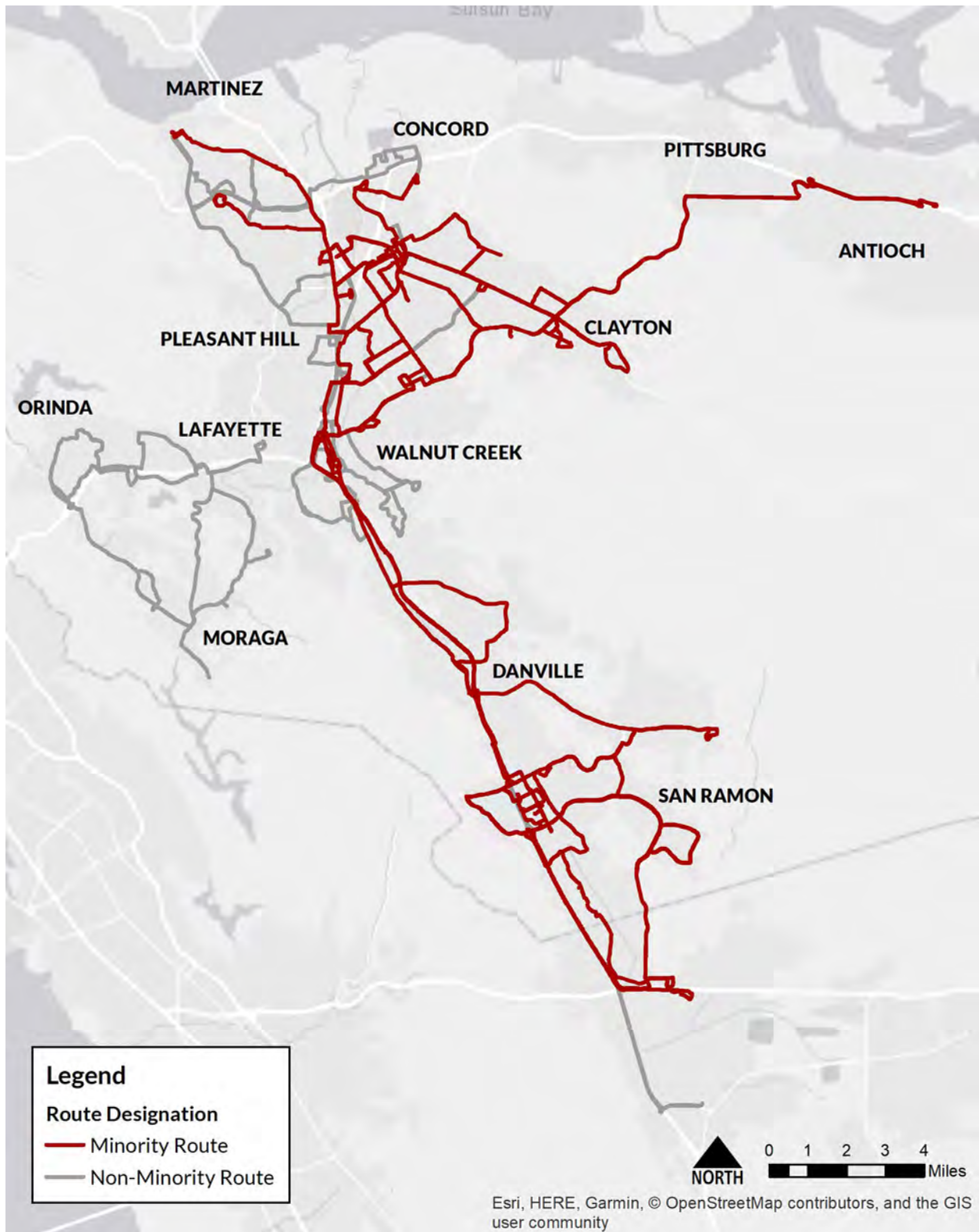
Route	% Mileage in Minority Block Group	% of Minority Riders	Minority Route	% Mileage in Low Income Block Group	% of Low Income Riders	Low Income Route
311	<b>33.3%</b>	<b>60.0%</b>	yes	<b>37.4%</b>	33.3%	yes
314	<b>59.7%</b>	<b>70.0%</b>	yes	<b>57.0%</b>	<b>56.3%</b>	yes
315	<b>51.2%</b>	50.0%	yes	<b>53.7%</b>	0.0%	yes
316	32.4%	46.7%		<b>47.1%</b>	<b>92.9%</b>	yes
320	<b>93.9%</b>	<b>75.0%</b>	yes	<b>88.5%</b>	<b>100.0%</b>	yes
321	15.3%	<b>70.0%</b>	yes	14.6%	11.1%	
335	<b>84.6%</b>	--(1)	yes	2.9%	--(1)	

Source: U.S. Census Bureau, 2015-2019 American Community Survey; 2019 Onboard Survey

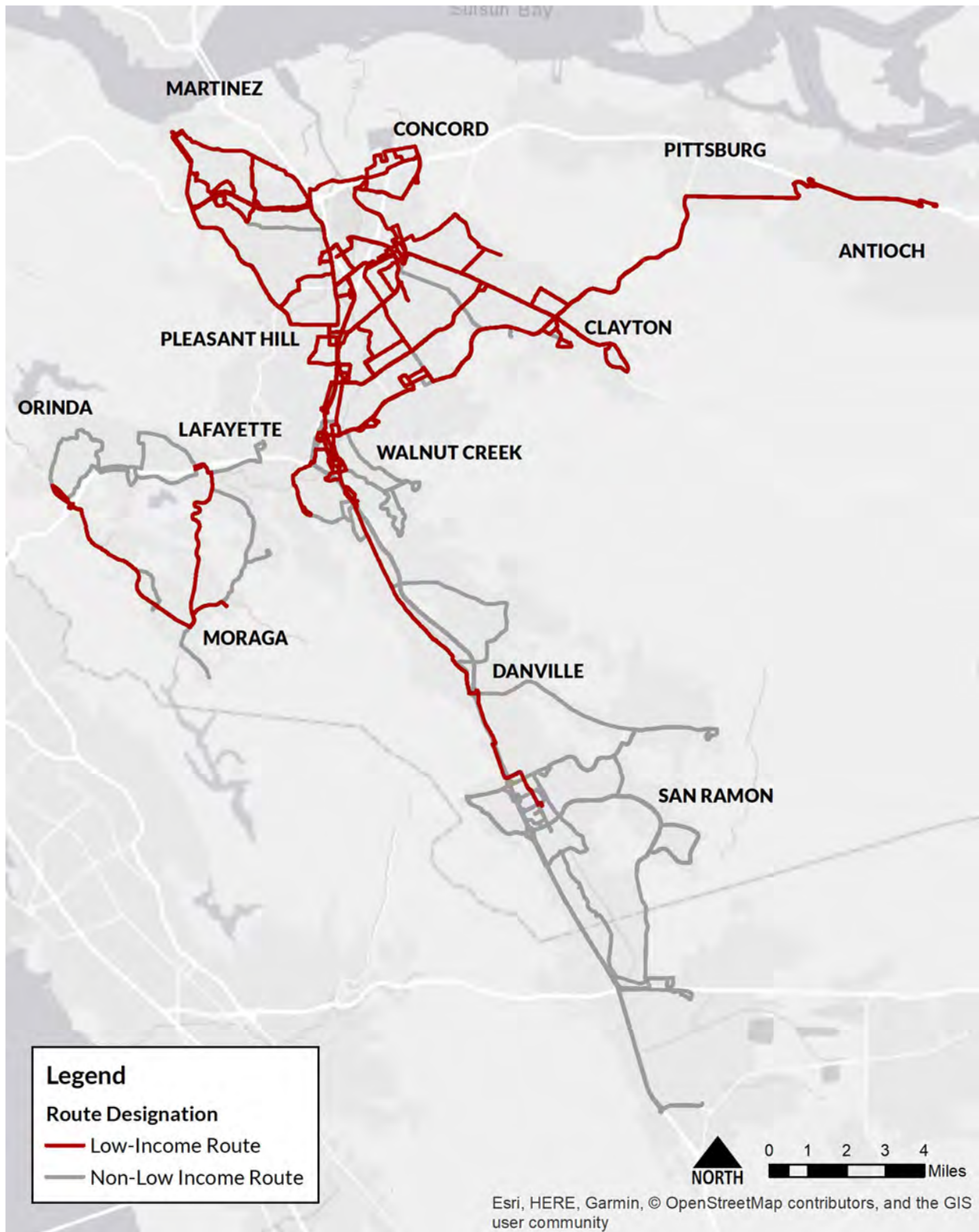
**Bold** indicates percentages meeting threshold for minority or low-income

(1) No survey data available for Routes 27 & 335

County Connection Routes Categorized by Minority/Non-Minority



County Connection Routes Categorized by Income Level



## Vehicle Load

### Standard:

Vehicle Load Factor is defined by FTA Circular 4702.1b as “the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees.” County Connection’s vehicle load standards are calculated by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route.

### Finding:

Across all County Connection routes, vehicle load factor standards were met.

### Vehicle Load Factor

Vehicle Load Factor	Peak	Off-Peak
Standard	1.25	1.00
Actual	0.27	0.25
<b>By Route Designation</b>		
Minority Route	0.27	0.27
Non-Minority Route	0.26	0.24
Low Income Route	0.26	0.26
Non-Low Income Route	0.27	0.21

Source: Fall 2019 APC data

## Vehicle Headway

### Standard:

Vehicle headway is defined by FTA Circular 4702.1B as “the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.” County Connection has established a maximum vehicle headway standard of 2 hours.

### Finding:

Based on schedules from Winter 2019 (effective November 17, 2019), the maximum systemwide headway was on Route 6 with midday frequency on weekends of 120 minutes, which just meets the

vehicle headway standard. However, it should be noted that significant service changes were made within the past year, which improved efficiency and reduced the maximum systemwide headway to 90 minutes.

Route 6 is also designated as a non-minority and low-income route. Among minority routes, the maximum headway was on Route 19 with a frequency of 90 minutes. Among non-low income routes, the maximum headway was 60 minutes.

#### Maximum Vehicle Headway

Vehicle Headway	
Standard	2:00
Actual	2:00
By Route Designation	
Minority Route	1:30
Non-Minority Route	2:00
Low Income Route	2:00
Non-Low Income Route	1:00

#### On-Time Performance

##### Standard:

On-time performance is defined by FTA Circular 4702.1b as “a measure of runs completed as scheduled.” A bus is considered late if it departs its scheduled “time point” five or more minutes later than the scheduled time. A bus is considered early if it departs from a scheduled “time point” at any time prior to the scheduled departure time.

##### Finding:

Overall, County Connection met its on-time performance standards for almost all route types, as shown below.

### On-Time Performance

On-Time Performance	Local	Express	Select <sup>(1)</sup>	Weekend
Standard	87%	75%	80%	80%
Actual	87%	85%	82%	83%
<b>By Route Designation</b>				
Minority Route	89%	85%	--	82%
Non-Minority Route	85%	86%	--	87%
Low Income Route	87%	89%	--	85%
Non-Low Income Route	84%	84%	--	80%

Source: FY 2019 APC data

(1) Select routes do not have minority or low-income designations due to the inability to collect reliable survey data, as the routes mostly serve youth riders.

### Service Availability

Service availability/transit access is defined by FTA Circular 4702.1B as “a general measure of the distribution of routes within a transit provider’s service area.” County Connection’s goal is to ensure that 70 percent of county residents live within three quarters of a mile from a bus stop.

#### Finding:

County Connection’s standard for service availability was met for the service area population as a whole, as well as for minority and low-income populations.

### Service Availability Population

Service Availability	
Standard	70%
Service Area Population	654,949
Population within 3/4 Mile	501,864
% Population Served	77%
Minority Population	
Service Area Minority Population	306,465
Minority Population within 3/4 Mile	219,438
% Minority Population Served	72%
Low-Income Population	
Service Area Low-Income Population	76,012
Low-Income Population within 3/4 Mile	54,496
% Low-Income Population Served	72%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

## Systemwide Service Policies

### Vehicle Assignment

Vehicle assignment is defined by FTA Circular 4702.1B as “the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider’s system.” County Connection’s policy states that all buses have the same level of amenities (i.e., air conditioning, wheelchair lifts, automated stop announcements) available to riders.

Buses are not assigned to specific communities within County Connection’s service area based on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths based on street limitations. Many of the routes serve multiple communities with diverse populations. Given County Connection’s strict standards with respect to maintenance, age does not serve as a viable proxy for diminished quality.

## Transit Amenities

Transit amenities are defined by FTA Circular 4702.1B as “items of comfort, convenience, and safety that are available to the general riding public.” These include bus shelters, bus stop benches, and trash receptacles. Transit amenities are distributed on a system-wide basis. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference.

### Standard:

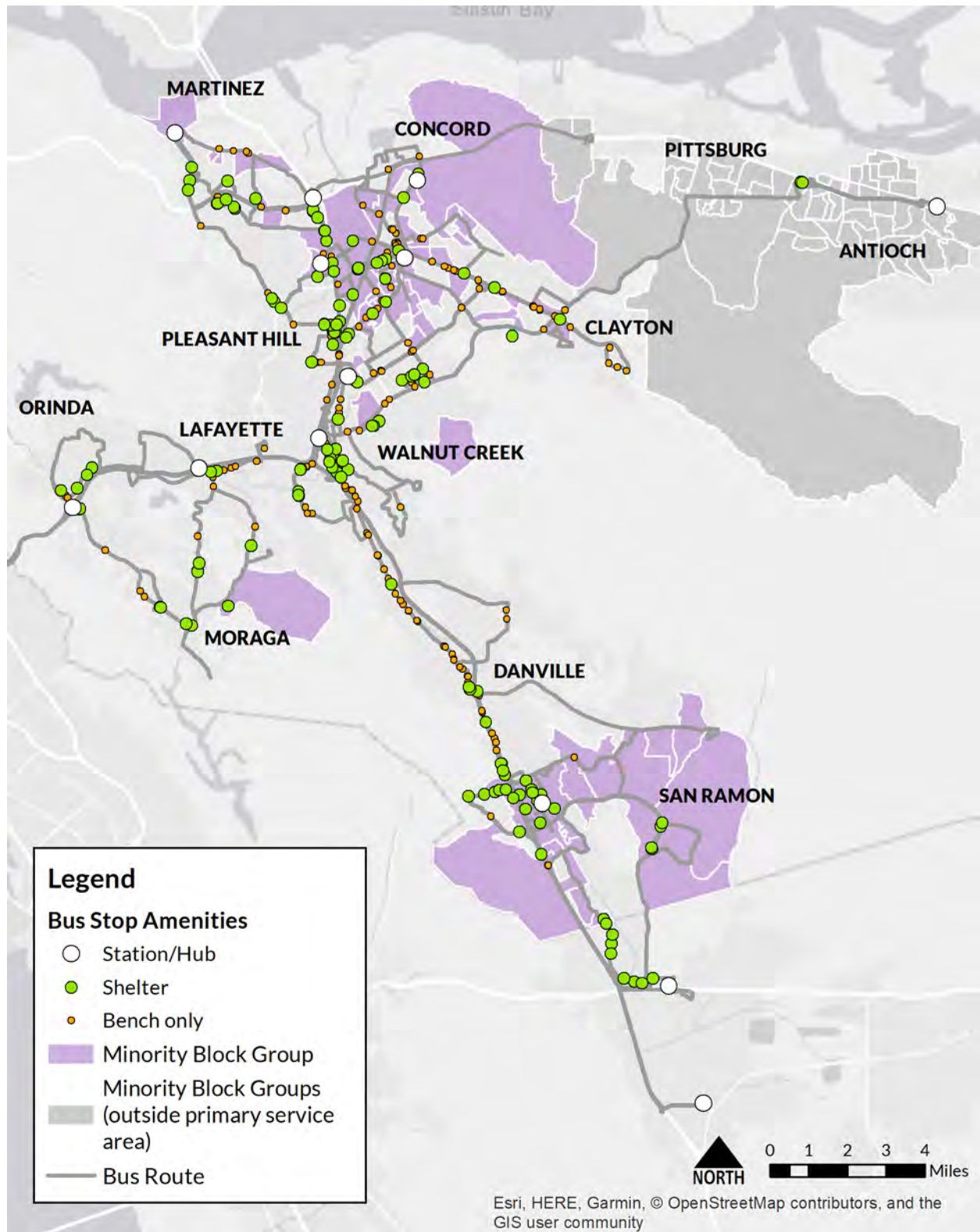
County Connection’s policy states that transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements). Staff seeks to distribute benches and shelters to match the distribution of minority Census tracts.

### Finding:

Staff has worked with jurisdictions to distribute benches and shelters to match the distribution of minority Census tracts and the map below confirms this correlation. It should be noted that while County Connection provides some service to Eastern Contra Costa County, this is outside of the agency’s primary service area, and stops in East County are instead under the jurisdiction of Tri Delta Transit.



Bus Stop Amenity Locations



## J. POLICY DEVELOPMENT OUTREACH

FTA Circular 4702.1B requires public outreach during development of each large public transportation provider's Major Service Change, Disparate Impact and Disproportionate Burden Policies.

When County Connection considered and adopted these policies, Staff developed draft policies and received public input through three community meetings, with language services available, throughout the County Connection's service area. Comments also were solicited and accepted via County Connection's website.

County Connection held the following community meetings:

- Thursday, March 28, 2013 - 7 p.m. to 9 p.m.  
Monument Corridor Transportation Action Team  
1736 Clayton Rd, Concord, CA 94520
- Monday, April 15, 2013 - 5:30 p.m. to 7:30 p.m.  
San Ramon Community Center  
12501 Alcosta Blvd, San Ramon, CA 94583
- Tuesday, May 14, 2013 - 1:30 p.m. to 5 p.m.  
Walnut Creek Library  
1644 N Broadway, Walnut Creek, CA 94596

The meetings participants provided valuable comments for staff. Upon receipt of the input from public outreach, staff revised the proposals for its policies and submitted them for Board approval. They were approved June 20, 2013.

## K. TITLE VI EQUITY ANALYSES

In the past three years, County Connection has conducted equity analyses for the following fare or service changes:

- Elimination of Route 3 and Implementation of Route 99X in Martinez
- 2019 Service Restructure Plan
- 2019 Fare Restructure
- Monument Free Program
- Clipper START and Youth Fare
- 2021 Service Plan

A copy of each Board-approved equity analysis is attached.

# **County Connection Title VI Equity Analysis – Elimination of Route 3 and Implementation of Route 99X in Martinez**

## **Introduction**

As a federal grant recipient, the Central Contra Costa Transit Authority (County Connection) is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI regulations. County Connection's Title VI Program was updated at the March 2018 Board of Director's meeting.

This Title VI assessment covers the equity analysis of the elimination of County Connection's Route 3 and the implementation of the proposed Route 99X.

Route 3 was developed as part of County Connection's Adaptive Service Analysis Plan, adopted in December 2013. Route 3 was launched as part of a service proposal in Martinez and Walnut Creek in August 2015. Since then, the route has performed below County Connection's performance guidelines and the grant used to pay for the route has a new set of guidelines.

Route 99X, which is peak service from Martinez Amtrak to North Concord BART, is a new proposed route that complies with the new set of guidelines and was asked for by the community.

## **Proposal**

County Connection is proposing to eliminate Route 3 and to implement a new route, Route 99X. This service change is proposed to be implemented in the Fall 2018 bid, on August 10, 2018.

## **Public Outreach:**

Beginning in April 2018 staff conducted outreach to receive public comments on these service recommendations.

The public was able to comment on the proposed changes in the following ways:

- ☐ Attending public meetings (one in Martinez City Hall and one in County Connection's board room,
- ☐ Emailing [planning@countyconnection.com](mailto:planning@countyconnection.com),
- ☐ Calling County Connection Customer Service,
- ☐ Commenting on County Connection's website, or

Notices for the public meeting and public hearing were placed on the buses as well as in the East Bay Times and information about the changes was available on County Connection's website.

### *Public Meeting at Martinez City Hall*

Attendees: 12 members of the public, one City of Martinez staff, 2 CCCTA staff

Summary: The public generally wanted to retain Route 3. Most were seniors who live in the Estadio/Vista/Terrace Way area where there isn't any other alternatives. Many attended the meeting with mobility aids. Attendees wanted access to Walmart, Kaiser, Muir Station Shopping Center, and movies. They also suggested partnering with local business to continue funding Route 3. Staff shared proposal to change Route 28 to serve the Vista Way area and also provided alternative routes and suggested attendees call customer service for assistance with trip planning.

Other forms of feedback:

1 call to customer service, summary: From Helen Ryan: She is disabled living in Riverhouse with 79 residents. She uses Route 3 to get to the housing authority, Walmart and movie theater. She is requesting that Route 3 isn't eliminated.

1 call to Manager of Planning, summary: Ms. Varner called and thanked CCCTA staff for setting up the meeting and listening to their concerns.

1 email to customer service (verbatim): number 3 bus. This bus route is very important to us seniors, with all its important stops. What is the proposed route for the so-called 99X. Another BART run. It's time to replace some of the big shots at county connection and get more route drivers.

2 letters to County Connection, summary: The writers requested we retain Route 3 (attached).

### **Recommendation:**

Staff recommends eliminating the Route 3 Martinez Shuttle and implementing Route 99X, express service from Martinez AMTRAK to North Concord BART.

## **Title VI Policies**

In June 2013 County Connection's Board of Directors adopted the following policies:

### ***Major Service Change Policy***

County Connection defines a major service change as:

1. An increase or decrease of 25 percent or more to the number of transit route miles of a bus route; or
2. An increase or decrease of 25 percent or more to the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or.
3. A change of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.

Changes shall be counted cumulatively, with service changes being "major" if the 25 percent change occurs at one time or in stages, with changes totaling 25 percent over a 12-month period.

The following service changes are exempted from this policy:

1. 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.
2. 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), as long as the service will be/has been operated for no more than twelve months.
3. County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.

### ***Disparate Impact Policy***

County Connection policies establish that a fare change or major service change has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

### ***Disproportionate Burden Policy***

County Connection policies establish that a fare change or major service change has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated.

**Public Outreach:**

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

**Meetings:**

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

*Comments: None*

**Title VI Equity Analysis**

The proposed implementation of Route 99X and elimination of Route 3 constitutes a major service change which necessitates a Title VI Equity Analysis.

**Adverse Effects**

Staff has defined and analyzed adverse effects related to this major service change as increased route miles and route hours, and have considered the degree of the adverse effects when planning the service change.

**Analysis Framework**

Staff used Census 2015 census-block data for this analysis. This data was used to compare the change in revenue miles and hours in minority blocks to non-minority blocks resulting from elimination of the Route 3 Martinez Shuttle and implementation of the proposed Route 99X. No low-income tracts are served by either Route 3 or the proposed Route 99X as of our latest 2018 Title VI update. This data was

selected because it was the most comprehensive data available for the areas affected by the service change.

### ***Assessing Impacts***

Based on American Community Survey 2015 data, 41.6% of the population residing in County Connection's service area identifies as minority. This designates any census block with a greater than 41.6% minority population a "minority block."

Because 4.2% of the population residing in County Connection's service area is determined to be below the poverty level, any block with greater than 4.2% below the poverty level is designated a "low-income block."

The tables below show the results of the census block, ArcGIS, and Line Summary analysis. The tables compare the proposed route implementation of Route 99X compared to the current Route 3 service in revenue miles and revenue hours operated in minority to non-minority blocks.

The proposed route will also increase service to non-minority census blocks more than service to minority census blocks, however, the proposed Route 99X is longer with two service patterns. The increase in minority route miles is over 2,300% more than the increase in non-minority route miles. Implementing Route 99X would also increase minority route hours by 180% more than non-minority route hours.

	Current	Proposed	% Difference
Minority Rt. Miles	0.31	8.63	2684%
Non-Minority Rt. Miles	6.97	30.06	331%
Total Rt. Miles	7.28	38.69	431%
Minority Rt. Hours	1.00	3.17	217%
Non-Minority Rt. Hours	13.50	8.46	-37%
Total Rt. Hours	14.50	11.63	-20%

### ***Parallel Transit Service to Route 3***

As seen on the map on the proceeding page, most of Route 3's coverage will be maintained through a combination of service from other existing County Connection routes including route 16, 18, 28 and 98X. The only segment without retained coverage is Arnold Dr between Howe Rd and Morello Ave, where Walmart resides. This segment has a length of 1.1 miles, with walking distances of a maximum of 0.55 miles from either Route 28 on Howe Rd/Arnold Dr, or Route 18 on Morello Ave/Arnold Dr.

### ***Conclusions***

This data demonstrates that the implementation of the elimination of the Route 3 Martinez Shuttle and implementation of the proposed Route 99X will not have a disproportionately adverse effect on residents of minority blocks.



**To:** Board of Directors

**Date:** 12/11/2018

**From:** Ruby Horta – Director of Planning & Marketing

**Reviewed by:** WC.

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**SUBJECT: Final Service Restructure Proposal and Title VI Analysis**

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### **Background:**

Last summer, County Connection staff started the process to restructure service throughout Central County in an effort to increase productivity. As public transit continues to be redefined, with various new mobility options, County Connection staff strives to align efficient service with demand. Over the last year and a half, staff conducted a data-driven process, which started with a Comprehensive Operational Analysis (COA). The COA provided route by route data, down to the trip and stop level. In addition to the COA, staff also completed a passenger survey, and personally traveled on various routes particularly those proposed to be cut, reduced or realigned to incorporate the human element and communicate the process to the passengers directly.

Throughout the public comment process, staff adjusted the proposal in an effort to minimize the negative impacts. The initial proposal was presented to Board on April 19, 2018. Attachment 1 offers the initial proposal, with revisions highlighted. Staff is confident that the final proposal addresses many of the comments received during the public comment period. Comments were shared with the Board on September 20, 2018 and are included as Attachment 2.

### **Service Restructure:**

The primary goal of the service restructure is to increase productivity by aligning service with demand. Staff recognizes that some communities will no longer have access to public transit, due to low ridership. However, given the new mobility options, the restructure provides an opportunity for staff to evaluate alternative services that would be better suited to serve communities with lower densities and tailor transit needs to the limited demand.

While this proposal reduces overall annual revenue hours, this is not a service cut for most passengers, since many trips will be added to core routes. Major improvements include:

- Route 4 will have better morning service and 12 minute service almost all day, an increase from every 15 minutes all day and every 45 minutes in the early morning.
- Routes 9 and 19 will have faster and simpler service with regular headways all day
- Route 14 will run every 30 minutes from the current 40, and will be extended to Walnut Creek BART, providing coverage to 6,286 more residents and 11,874 more jobs within ¼ mile of the new alignment.

- Route 310 will be extended to Downtown Clayton, providing weekend service for the first time in decades. This also provides service to trailheads in the area, including Mt. Diablo.
- North Concord, including parts of Bates Ave. and Mason Circle, will get all day service for the first time in a decade with the new Route 27.
- Service span, or the start to end time of a route, will increase more than an hour on the following routes: 14, 27 and 320. In addition, several routes will have increased service in the peak hours.
- Peak commute service connecting to BART was increased on Routes 4, 6, 35 (including former parts of Route 36 along Crow Canyon) and 98X.

As mentioned earlier, the primary goal of the service restructure is to increase ridership. However, it should be noted, that the Board will have the opportunity to review the final fare proposal in January. Some of the expected ridership increases may be negated by a fare increase, as fares and ridership are, in general, inversely related.

### **Review of Public Process:**

The initial proposal was presented to the Board in April 2018 and staff received authorization to conduct the public hearing process. Staff scheduled six (6) public hearings from June 25<sup>th</sup> to July 25<sup>th</sup> in the following cities: Martinez, Lafayette, Concord, Pleasant Hill, Walnut Creek and San Ramon. Additionally, comments were encouraged via mail, email, phone, and on our website. The comments received were presented at the September Board meeting. In addition to the public hearing process, the service proposal requires a Title VI review to ensure low income and minority communities are not disproportionately impacted. Legal counsel has reviewed the public hearing process as well as the Title VI analysis.

### **Title VI:**

Staff has completed the Title VI analysis based on the final proposal. The proposed changes amount to over 25% of the miles or hours of each route, which constitutes a major service change under County Connection's board, adopted Major Service Change Policy. According to circular 4702.1B, issued October 1, 2012 of Title VI of the 1964 Civic Rights act, Major Service Changes are required to undergo a Service Equity Analysis. As part of a 2013 Title VI Policy update, the County Connection Board established a threshold of 20% for disparate impacts to minorities and disproportionate burdens on low-income people. This update also indicated that County Connection's service area average low-income percentage was 4.2% (150% federal poverty standard) and 41.6% minority (% of census blocks with over 40% minorities).

Staff used Remix transit planning software to conduct the service equity analysis. The results of the analysis did not indicate any disparate impact to minorities or disproportionate burden on low-income people compared to the area service area average, with an 11.9% low-income delta and a -7.4% minority delta (which is an inverse impact). Both of these deltas are well under 20%.

Weekday Equity Analysis	Low-Income	Minority
Negative Change Borne By	16.1%	34.2%
CCCTA Area Average	4.2%	41.6%
Delta	11.9%	-7.4%

Since County Connection has a different service pattern on weekends with different 300 series route alignments, a separate equity analysis was done for weekends. The results of the analysis indicate that there is no disparate impacts to minorities or a disproportionate burden.

	Low-Income	Minority
Negative Change Borne By	16.1%	30.3%
Area Average	4.2%	41.6%
Delta	11.9%	-10.3%

For more details, and the complete Title VI analysis is included as Attachment 3.

### **Future Service Enhancements**

If approved, this service restructure will serve as the foundation of a new effort towards applying the “right fit” for transit demand throughout our service area. There are communities in our service area that though they may not generate enough ridership to support mass transit, their transit needs may be better served by one of the other emerging mobility options. Given the proliferation of emerging mobility options, staff will continue to work with various stakeholders to develop transit alternatives in areas where mass transit may not be the ideal solution. Staff will develop alternatives and bring those ideas to the Board throughout 2019.

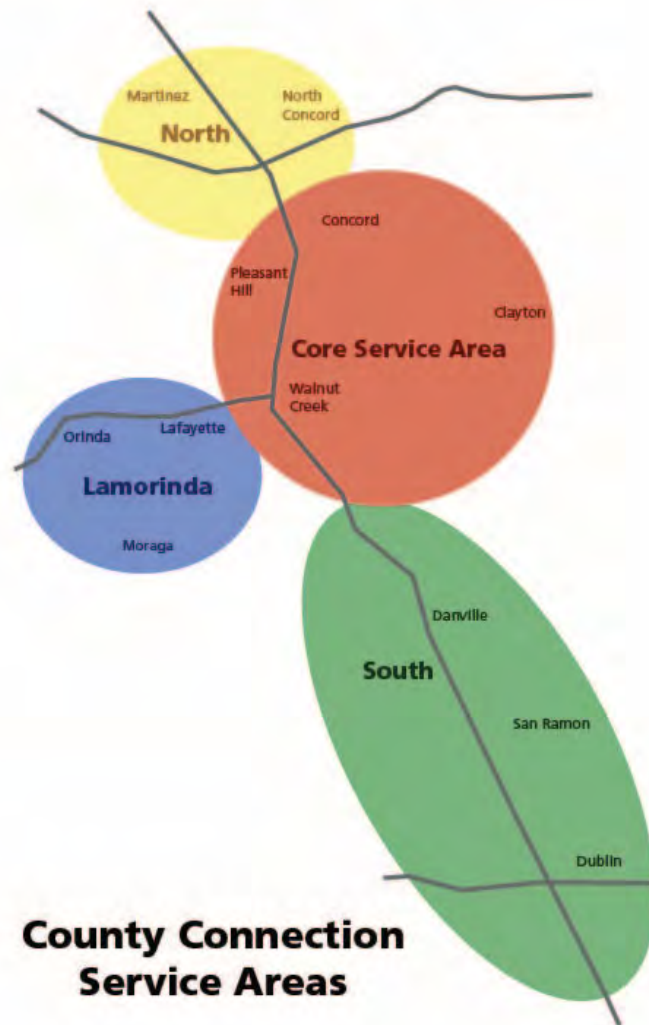
### **Financial Implications:**

Based on initial estimates, the service restructure could reduce costs by approximately \$1M annually. This is an initial projection and will be finalized once the schedules are complete. Staff will be able to report actual savings after the new service is implemented. At this time, the projected savings have not been secured for any project and/or for the reserves. The Board may choose to have that discussion once the new forecast is presented next Spring.

### **Action Requested:**

The O&S Committee requests that the Board approve Resolution 2019-014 which would authorize the General Manager to implement the proposed service restructure in Spring 2019 and submit the required Title VI service equity analysis to the FTA.

## Attachment 1: Proposed Service Restructure



### Core Service Area Restructure Concepts

- Streamline Route 19 to use Concord Ave. instead of going to Concord BART via Sun Valley Mall.
- Streamline Route 9 by eliminating routing to JFK, Patterson Blvd., and Oak Park Blvd.
- Realign Route 18 to service Patterson Blvd., and Oak Park Blvd. and adjust trip times to meet school bell times; consider routing along Taylor Blvd. instead of Viking Dr.
- Create a new alignment for Route 10 to turn around at Washington/Michigan instead of the Ayers Rd./Kirker Pass loop. End 50% of peak trips at this loop that currently continues on to Marsh Creek Rd. in Clayton. Only one quarter of the ridership rides past Kirker Pass
- Extend Route 14 to Walnut Creek BART to expand access to jobs from the Monument Corridor. Increase frequencies to every 30 minutes.
- Terminate Route 15 at Pleasant Hill BART (it will no longer service Walnut Creek BART, this will be covered by Route 14)

- Eliminate Route 1M and Route 2 due to low ridership and poor efficiency
  - Route 2: Passenger with medical concerns was referred to City of Walnut Creek's Lyft program, which is better suited to provide the medical trips required.
- Realign Route 95X to exit Hwy. 680 at S. Main St., to provide direct access to Downtown Walnut Creek from the south and avoid congestion
- Eliminate Route 301 to Rossmoor due to low ridership
- Extend 311 to John Muir Hospital to cover the Ygnacio Valley Rd. portion of 301
- Increase frequency on Route 4 from 15 minutes to 12 minutes
- Adjust times, where possible, on local routes to meet school bell times in the Pleasant Hill area
- ~~Eliminate Route 315 due to low ridership~~
  - Based on customer feedback and increased ridership, Route 315 will remain.

## North Restructure Concepts

The main changes to the north service area include:

- Split Route 28 in half and retain its Martinez-DVC segments
  - Eliminate service to Marsh Rd./Arnold Industrial Way
  - Add service to the Arnold/Morello high ridership corridor
- Create a new Route 27 to serve North Concord
  - Replace current Route 627, with more frequent service
- Add Route 98X peak trips to connect with Amtrak in Martinez

## Lamorinda Restructure Concepts

- Eliminate Route 25 due to low ridership
- Potentially increase peak service on Route 6

## South Restructure Concepts

- Eliminate Route 36, but retain coverage on its productive northern alignment with an extended Route 35. Review alternate transit options for San Ramon
- Extend Route 35 to Crow Canyon Rd., roughly double frequency of service
- Remove Alcosta Blvd. from Route 92X to speed up run times

## Attachment 2: Public Comments

### Core Service Area Restructure Concepts

- Streamline Route 19 to use Concord Ave. instead of going to Concord BART via Sun Valley Mall.
  - No comments.
- Streamline Route 9 by eliminating routing to JFK, Patterson Blvd., and Oak Park Blvd.
  - Support (1 comment): Hoped the change would increase frequency of buses at Pleasant Hill BART.
  - Oppose (2 comments): Two residents in Poet's Corner (Oak Park Blvd. & Patterson Blvd.) lament the loss of more direct service, including to Walnut Creek Bart.
- Realign Route 18 to service Patterson Blvd., and Oak Park Blvd. and adjust trip times to meet school bell times; consider routing along Taylor Blvd. instead of Viking Dr.
  - Support (1 comment): Align the schedule to school bell times.
- Create a new alignment for Route 10 to turn around at Washington/Michigan instead of the Ayers Rd. Kirker Pass loop. End 50% of peak trips at this loop that currently continues on to Marsh Creek Rd. in Clayton. Only one quarter of the ridership rides past Kirker Pass.
  - 1 comment asking if service will continue to Clayton Library.
- Extend Route 14 to Walnut Creek BART to expand access to jobs from the Monument Corridor. Increase frequencies to every 30 minutes.
  - Support (5 comments): The general consensus was that extending the Route 14 would benefit all passengers, "go ahead and do that ASAP to start reaping the anticipated benefits".
- Terminate Route 15 at Pleasant Hill BART (it will no longer service Walnut Creek BART, this will be covered by Route 14).
  - Oppose (1 comment): Do not want to transfer at Pleasant Hill and liked the direct through service of the existing Route 15.

- Eliminate Route 1M due to low ridership and poor efficiency.
  - Support (1 comment): One comment was in support of the necessary cuts, “I would be happy to pay more or wait longer if cuts need to be made”.
- Realign Route 95X to exit Hwy. 680 at S. Main St., to provide direct access to Downtown Walnut Creek from the south and avoid congestion.
  - Oppose (1 comment): Passenger who likes the direct ride down the freeway and thought the route would be slower through downtown.
- Eliminate Route 2 due to low ridership and poor efficiency.
  - Oppose (27 comments): Several comments opposing the elimination of the route, while acknowledging low ridership. Many commented that there are no sidewalks in the area or other bus service.
- Eliminate Route 301 to Rossmoor due to low ridership.
  - Support (2 comments): After we mentioned the 311 will go to John Muir Medical Center, we received two comments in support of eliminating Route 301.
- Extend 311 to John Muir Hospital to cover the Ygnacio Valley Rd. portion of 301.
  - See Route 301 comments.
- Increase frequency on Route 4 from 15 minutes to 12 minutes.
  - Support (1 comment): Indicated its better to have more service instead of attempting to meet BART trains that can have varying schedules midday.
- Eliminate Route 315 due to low ridership.
  - Oppose (3 comments): Desire to retain Route 315 as a lifeline service in the Landana area, which has several rest homes.

### North Restructure Concepts

- Split Route 28 in half and retain its Martinez-DVC segments.
  - Oppose (7 comments): Homeless shelter users would have to make transfers if Route 27 were implemented to access the VA and Contra Costa Blvd. Commenters were misinformed about the location of the new Wal-Mart stop and thought the

travel time from Amtrak to DVC would increase by going via Alhambra. Two comments opposing the elimination of Marsh Rd. and one opposing the elimination of Commercial Circle in North Concord.

- Create a new Route 27 to serve North Concord.
  - Oppose (1 comment): Passengers wants to avoid transfers to get to Contra Costa Blvd.
- Add Route 98X peak trips to connect with Amtrak in Martinez.
  - No comments.

### **Lamorinda Restructure Concepts**

- Eliminate Route 25 due to low ridership.
  - Support (1 comment): No need for Route 25 as BART provides a superior end to end trip, and they support redistributing its resources to Route 6.
  - Oppose (11 comments): Retain Route 25 to get to Walnut Creek BART. Residents and caretakers from Chateau Lafayette came to the public hearing to comment that they like Route 25 and they use it to get to Walnut Creek. (Note: Route 6 stop is closer to Chateau Lafayette than the Route 25, but they would have to transfer to BART to travel to Walnut Creek). Many who opposed the elimination of Route 25 said it doesn't have enough frequency to attract ridership.
- Potentially increase peak service on Route 6.
  - Support (9 comments): Look forward to better connections to BART, reduction in traffic congestion and access to schools.

### **South Restructure Concepts**

- Eliminate Route 36, but retain coverage on its productive northern alignment with an extended Route 35. Review alternate transit options for San Ramon.
  - Support (2 comments): One supporter liked that the new service to the Crow Canyon area will be faster to BART. Another supporter wanted large buses off of Fircrest due to pavement meant for low density areas.
  - Oppose (8 comments & signed petition with 34 signatures): Most of the opposition came from seniors at Valley Vista Housing on San Ramon Valley Blvd. and one came from a rider on Tareyton going to BART. The Valley Vista seniors wanted to retain service to Dublin for groceries and doctor appointments. There



was also one commenter who wanted to retain service to California High School in the mornings. Staff hosted a meeting at the Senior Center in San Ramon which was attended by more than 60 individuals, all against the elimination of Route 36.

- Extend Route 35 to Crow Canyon Rd., roughly double frequency of service.
  - Support (19 comments): Increasing the frequency was very popular with commenters, with peak service requested at 15 or 20 minute frequencies. In addition, supporters wanted service later at night, on weekends, and more service to the Windemere loop.
- Eliminate Route 97X and increase peak Route 35 frequency. Route 35 has similar travel times to the current Route 97X from East Dublin BART and Bishop Ranch. Route 97X has also has low ridership. This proposal requires additional discussion with Bishop Ranch.
  - Oppose (1 comments): Retain Route 97X.
- Remove Alcosta Blvd. from Route 92X to speed up run times.
  - No comments.

# Transit Service Equity Analysis

For County Connection's 2019 Service Restructure Plan

Central Contra Costa Transit Authority

December 2018

***County Connection***

**Submitted by**

Sean Hedgpeth, Manager of Planning

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## Background

In an effort to understand our current ridership trends and changing demographics, County Connection staff prepared a Comprehensive Operational Analysis (COA), which was completed in January 2018. The COA has provided staff with the foundation for a data-driven planning effort to restructure County Connection's service focused on increased productivity. Using the data from the COA, staff prepared the 2019 Service Restructure Plan (Plan), which proposes a series of changes to County Connection routes, including route changes, elimination of routes, and new service. These changes are projected to increase ridership, realign revenue hours to areas with the greatest potential for successful transit, and reduce costs, consistent with current budgetary constraints. The last time our system was significantly overhauled was in Spring 2009 and we acknowledge that a number of factors have changed. Housing developments, traffic patterns, demographic shifts, job centers and increased congestion all contribute to changing transit needs.

In areas where traditional public transit service is currently not productive, staff proposes that County Connection pursue other transit alternatives. Transit agencies across the nation are testing various forms of Microtransit. County Connection has implemented the Microtransit App for the Alamo Creek service, which allows riders to more efficiently book trips, and LAVTA replaced unproductive routes by subsidizing fares for riders using Lyft, Uber, or a Taxi in some areas. These types of transit alternatives will be considered as staff further develops the service restructure plan, with Board feedback, including the preparation of equity analyses for any alternatives that result in major service changes.

In addition to focusing on providing a more productive service, staff also recognizes the agency's projected budgetary constraints. Revenues for transit have not kept up with expenses and our current budget projects a deficit in Fiscal Year (FY) 2023. By making service adjustments that increase productivity and reduce costs, County Connection will be better positioned to address future financial constraints.

Given the scope of the proposed service restructure, staff conducted a thorough public comment period. Staff has also presented the plan to the Board's Operations & Scheduling Committee over the summer, with a final proposal to be presented in December 2018. In addition to the feedback received from the Committee, County Connection staff has met with various stakeholders including the local Amalgamated Transit Union's leadership and staff from various cities in our service area. For the most part, stakeholders have been receptive to the plan and the overarching goal of increased productivity. Should the Board approve the service changes, staff would implement the changes in March 2019.

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination by recipients of federal financial assistance. The Federal Transit Administration (FTA) further requires that recipients of FTA financial assistance conduct an analysis on all major services changes to assess the impacts of those changes on low-income and minority populations. As the Plan constitutes a major service change, the Board must review and approve this equity analysis prior to approving the Plan.

The equity analysis indicates that the Plan does not impose a disproportionate burden on low-income populations, or have a disparate impact on minority populations. To the contrary, the cumulative effects of the Plan, taking into account both the service reductions and new service, result in a net benefit to low-income populations and minority populations. The amount of benefit expected for each

of these groups satisfies County Connection's disproportionate burden policy and disparate impact policy.

## Title VI Requirements and County Connection Title VI Policies

In October 2012, the Federal Transit Administration released new guidelines for compliance with Title VI (Title VI Circular 4702.1B). Under the Circular, transit operators are required to study proposed fare changes and “major” service changes before the changes are adopted to ensure that they do not have a discriminatory effect based on race, ethnicity, national origin or socio-economic status of affected populations. As a first step, public transit providers must adopt their own “Major Service Change,” “Disparate Impact,” and “Disproportionate Burden,” policies. The three policies, and County Connection's proposals, are described below.

### **Major Service Change Policy**

#### **Description:**

This policy establishes a threshold for when a proposed service increase or decrease is “major,” and thus must be subject to a Title VI Equity Analysis.

County Connection previously defined major service decreases in its adopted “Public Hearing Policy.” The Major Service Change Policy applies this threshold to both increases and decreases, and provides for changes to be measured not just individually, but on a cumulative basis over a 12-month period.

#### **Policy:**

County Connection defines a major service change as:

- An increase or decrease of 25 percent or more to the number of transit route miles of a bus route; or
- An increase or decrease of 25 percent or more to the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or.
- A change of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.
- Changes shall be counted cumulatively, with service changes being “major” if the 25 percent change occurs at one time or in stages, with changes totaling 25 percent over a 12-month period.

The following service changes are exempted from this 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), as long as the service will be/has been operated for no more than twelve months.

- County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.

### **Disparate Impact Policy**

#### **Description:**

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on minority populations relative to non-minority populations on the basis of race, ethnicity or national origin.

The threshold is the difference between the burdens borne by, or benefits experienced by, minority populations compared to non-minority populations. Exceeding the threshold means either that a fare or major service change negatively impacts minority populations more than non-minority populations, or that the change benefits non-minority populations more than minority populations. A change with disparate impacts that exceed the threshold can only be adopted (a) if there is substantial legitimate justification for the change, and (b) if no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

#### **Policy:**

County Connection establishes that a fare change, major service change or other policy has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

### **Disproportionate Burden Policy**

#### **Description:**

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on low-income populations relative to non-low-income populations.

The threshold is the difference between the burdens borne by, and benefits experienced by, low-income populations compared to non-low income populations. Exceeding the threshold means either that a fare or service change negatively impacts low-income populations more than non-low-income populations, or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, County Connection must avoid, minimize or mitigate impacts where practicable.

#### **Policy:**

County Connection establishes that a fare change, major service change or other policy has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden,

or experience 20% less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated.

### **Public Outreach:**

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

#### Meetings:

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

*Comments: None*

## Proposal & Major Service Change Analysis

The 2019 Service Restructure Plan makes over forty changes to our routes, resulting in both beneficial and adverse impacts. These changes include several route eliminations, extensions, reductions, a new route, and schedule changes that independently constitute major service changes. Many of the remaining changes complement the major service changes to either directly or indirectly mitigate losses of service.

Due to the interconnected nature of the changes in the Plan, this analysis evaluates all of the implementation of the Plan as a single change. While CCCTA's Major Service Change Policy only calls for an evaluation of major service changes, this is consistent with the Major Service Change Policy's principle of evaluating all changes to a given route occurring within a year cumulatively. A list of the changes is attached as Appendix A.

## Service Equity Analysis Methodology

This analysis evaluates the impacts of the Plan by comparing the effects on the number of "people-trips" generated by the affected routes. People-trips is a census block based metric that measures the number of persons living within 1/4 mile of each bus running a route affected by the Plan. In addition to comparing the demographics of the census blocks within 1/4 mile of the changed service, people-trips factors in the number of persons able to access the route, and the headway of the route to more accurately quantify the effects of multiple types of service changes.<sup>1</sup>

County Connection generated this equity analysis using the Remix program, which compares existing service to a set of proposed changes. This page outlines the methodology and data sources we used when generating this report.

### Data sources

- Population data is provided by the US American Community Survey (ACS), 2012-2016. Data is measured on a census block group basis. (ACS data is collected by the Census Bureau in the years between decennial censuses.)
- Population is coded by table B03002, field B03002001.
- Low income status is set at 150% the US poverty level. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).
- Service area is a set of block groups determined by our most recent Title VI Program update.
- Map and routing data is provided through OpenStreetMap, Mapbox, and Valhalla.

### Methodology

1. Quantify the population near a route, including its low-income and minority percentages.
  - For each route, build a shape that represents the area within quarter mile of any of its stops. This is the catchment area.
  - Overlay the catchment area with 2012-2016 ACS data. Get a list of block groups and the percentage overlap with each.
  - For each block group, take the percentage of overlap with the catchment area and multiply it by the block group's population, minority population, and low-income population.
  - Calculate the total population within the catchment area by summing the subtotals from each block group. Calculate the total minority population, total non-minority population, total low-income population, and the total non-low-income population.
  - Repeat for each route subject to a change.

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<sup>1</sup> The Circular specifies that where a transit provider is proposing a major service change that involves both headway changes and new service to a neighborhood, the transit provider may use either census data or ridership data for the entire analysis. The Plan involves both changes in headway and new service, as well as elimination of routes.



2. For each route subject to a change, compare the number of people-trips, before and after the change for minority, non-minority, low-income, and non-low-income populations due to the Plan.
  - Multiply the population in each catchment area by the number of trips the route makes (per year) to get “people-trips”.
  - Repeat for low-income and minority populations to get “low-income people-trips” and “minority people trips”.
  - Repeat for non-low income and non-minority populations to get “non-low-income people-trips” and “non-minority people trips”.
  - Compare these numbers between the before and after versions of the route, to get a set of people-trip differences. We match before and after using routes that have the same name.
3. Calculate the total change in people-trips across all routes for each group due to the Plan.
  - Find the sum of all minority people-trips, non-minority people-trips, low-income people-trips, and non-low-income people-trips for all routes before implementation of the Plan.
  - Find the sum of all minority people-trips, non-minority people-trips, low-income people-trips, and non-low-income people-trips for all routes after implementation of the Plan.
  - For each group, subtract the number of people-trips after implementation of the Plan from the people-trips before implementation of the Plan.
4. Calculate the percentage of the change in people-trips for each group.
  - For each group, divide the total number of people-trips before implementation of the Plan by the total number of people-trips after implementation of the Plan.
5. Compare the percentage change in people-trips borne by low-income populations against non-low-income populations, and minority populations against non-minority populations.
  - Subtract the change in people-trips for non-minority populations from the change in people-trips for minority populations.
  - Subtract the change in people-trips for non-low-income populations from the change in people-trips for low-income populations.
6. Compare the difference to the thresholds set in the disparate impact policy and disproportionate burden policy.
  - Determine whether the delta between low-income population and non-low-income population exceeds 20%.
  - Determine whether the delta between non-minority population and minority population exceeds 20%.

## Service Area Demographics

As part of the update to County Connection’s Title VI Program Update, new analysis was done of our service area demographics. For this analysis, staff used 2015 ACS data. In 2015, the analysis was done on smaller Census Block Groups instead of the larger Census Tracts, which gives us more accurate data.

Based on the data, County Connection serves 375 Census Blocks, with minority populations making up 41.6% of the service area population. The proportion of the service area population living below the poverty level is 4.2%. For poverty status, 150% of the federal poverty guidelines were used, which is currently \$36,450 for a family of four.

## Potential Adverse Impacts

### Weekday Service: Negative Impacts

In addition to the cumulative impacts of all changes from the Plan we also analyzed the difference between the impacts borne by minority and low-income populations compared to the overall percentage of minority and low income populations within the service area. While not required for the Service Equity Analysis, this comparison is useful to understand how the benefits and burdens of the Plan are allocated.

In total, 16.1% of the eliminated people-trips served low-income populations and 33.6% served minorities. The CCCTA service area averages 4.2% low-income (150% of federal poverty guidelines) and 41.6% minority populations, respectively. While over 8 million total person-trips are lost in the service change, over 48 million new low-income trips and over 70 million new minority person trips would be added (see Appendix 1 for details). Some of the larger route level impacts, with the reasoning and possible mitigation, are outlined below.

	<b>Low- Income</b>	<b>Minority</b>
Negative Change Borne By	16.1%	33.6%
CCCTA Area Average	4.2%	41.6%
<b>Delta</b>	<b>11.9%</b>	<b>-8.0%</b>

### Route 1M

Route 1M, which provides more service from John Muir Medical Center at peak travel times, is proposed to be eliminated. This service change will be mitigated by increasing service on Route 1 to every 45 minutes all day, which connects the same area except for a small loop to Marchbanks Rd. A Route 1/93X bus stop at Ygnacio Valley Road and Marchbanks was also moved in Summer 2018, to provide a closer connection for current Route 1M riders. This will allow 1M riders to take either the 1 or the 93X, which operates at peak times. The combined Route 1 frequency increase and Route 1M elimination creates a loss of 1.5 million annual low-income and minority person-trips, as defined by the Remix methodology.

### Route 2

Route 2, which provides eight trips of peak service to Walnut Creek BART from the Rudgear neighborhood. This route has been proposed for elimination several times over the last decade, due to low ridership of only about 16 passengers a day. This change eliminates almost four million low-income and seven million minority person-trips. Almost all of the Title VI population on Route 2 are located on the northern end of the route in multi-family housing along Broadway. Those residents have a much more frequent and free-fare option with Route 4, the Downtown Walnut Creek Trolley, one block away.

In addition, the City of Walnut Creek now has a pilot with Lyft to provide seniors with rides, which partially mitigates some of the feedback we received from our Walnut Creek Public Hearing.

#### Route 9/18

Routes 9 and 18 had alignments swap, with Route 18 adding coverage that Route 9 abandoned for a faster, more streamlined Route 9 trip. The Remix methodology listed this as a negative change, with a loss of 18 million low-income and over 43 million minority trips. While this seems like an obviously negative change, no actual coverage was deleted besides of two Route 9 stops within walking distance in Pleasant Hill. There was only a net loss of six trips in total when comparing the old 9/18 to the new 9/18, mostly by reducing frequency after 7pm, when ridership is only about five passengers a trip. In addition, the travel times will be 12% faster between major activity centers such as Diablo Valley College (DVC), Downtown Pleasant Hill (Crescent Plaza), and Pleasant Hill BART.

<u>Current Travel Times</u>	<u>Rt. 9</u>	<u>Rt. 18</u>	<u>AVG</u>	<u>Proposed Travel Times</u>				<u>Rt. 9</u>	<u>Rt. 18</u>	<u>AVG</u>	<u>Savings</u>
<i>Southbound</i>				<i>Southbound</i>							
DVC to PH BART	34	31	32.5	DVC to PH BART	25	36	30.5				6%
Crescent Plaza to PH BART	23	16	19.5	Crescent Plaza to PH BART	11	18	14.5				26%
<i>Northbound</i>				<i>Northbound</i>							
PH BART to Crescent Plaza	20	8	14	PH BART to Crescent Plaza	8	15	11.5				18%
PH BART to DVC	36	28	32	PH BART to DVC	25	34	29.5				8%
<b>Totals</b>	<b>28.3</b>	<b>20.75</b>	<b>24.5</b>	<b>Totals</b>	<b>17.3</b>	<b>25.75</b>	<b>21.5</b>				<b>12%</b>

#### Route 10

Route 10, which connects East Concord to Concord BART, technically is a negative change with the Remix methodology, losing almost 10 million *total* person-trips. However, since the service change creates a shorter pattern with more trips focused on the western portion of the route with more Title VI populations, an additional million low-income and minority person-trips would result from the change.

#### Route 19

Route 19 is proposed to drop some coverage around Sun Valley Mall. While 1.5 million low-income and minority person-trips are lost with the Remix methodology, the streamlined alignment will allow for a frequency enhancement to every 90 minutes instead of the current 2 hours, and during the midday there will be a second bus which will provide a brief period of 60 minute frequencies. Public outreach indicated that this route was largely used to access social services, which have a higher demand during midday. In addition, the loss of Sun Valley Mall coverage is mitigated by much more frequent Route 20 service.

#### Route 25

With the proposed elimination of Route 25, over nine million low-income and almost 15 million minority trips would be lost. Route 25 is a rather new route that started in 2009. The route connects two BART stations, which have far more robust service every 15 minutes on weekdays, with a faster travel time of only four minutes on a BART train as opposed to 23 minutes on the Route 25 bus. According to the COA FY17 data, only about 7% of the boarding activity takes place outside of a half mile of either BART station. In addition, the area near Olympic Blvd and Tice Valley Blvd have Route 1 as a service alternative to Walnut Creek BART, and Route 1 is getting increased frequencies as part of mitigation for the loss of Route 25.

#### Route 28

When comparing the original Route 28 to the new truncated Route 28 and the new 27 that covers the eastern portion, Route 28 lost 9 million low-income and 17 million minority people trips. The new truncated Route 28 mitigates this loss in coverage partly by an increase of service from Amtrak to DVC, and with a net gain of trips on the new Route 27 serving the North Concord business park, which includes the homeless shelter.

#### Route 35/36

The elimination of Route 36, which when accounting for one segment retained in a new extended Route 35, lost over 6 million low-income and 37 million minority trips. However, the service hours that were previously used on Route 36 were shifted to more robust Route 35 service, which has the same terminals as the former Route 36. Over two million low-income and over 24 million minority person-trips were added with the increased service on Route 35. This change was mitigated by extending select trips of Route 35 to the Crow Canyon area of the northern portion of Route 36, which retained a large part of the Route 36 coverage.

#### Route 92X

Route 92X has a very minor change; eliminating Alcosta Blvd. This will remove over 100,000 low-income and over 500,000 minority person-trips. This was done to speed up the very long route.

### Weekday Service: Positive Impacts

Several of the service enhancements in the Plan generated benefits in the form of new people-trips. Many of these benefits would accrue to low-income and minority areas, such as the extension of Route 14 to Walnut Creek, which represents an increase of over 67 million low-income people-trips and over 125 million more minority people-trips when compared to the original Route 14 to Pleasant Hill it was replacing. Other service enhancements, such as changes to Route 20, increased low-income and minority people trips by over 23 million and 39 million respectively. In total, 33.7% of the new people-trips will serve low-income populations and 59.3% of the new people-trips benefit minorities.

	<b>Low-Income</b>	<b>Minority</b>
Positive Change Borne By	33.7%	59.3%
CCCTA Area Average	4.2%	41.6%
<b>Delta</b>	<b>29.5%</b>	<b>17.7%</b>

### Weekend Service: Negative Impacts

County Connection, with the exception of Routes 4 and 6, has a separate service pattern for weekend service. These routes are all in the 300 series, and have different alignments. A separate Remix analysis was done comparing the proposed service change to the weekend service. This analysis for negative impacts showed that reductions in people-trips serving low-income populations account for 16.1% of the service reductions, whereas low-income persons are 4.2% of the population as a whole. Compared to our area average, this creates a delta of 11.9% for low-income populations. People-trips serving minority populations account for 30.3% of reduction, while minorities are 41.6% of the population. The positive weekend changes benefit 70% of low income and minority populations, to help mitigate these negative changes.

	<b>Low-Income</b>	<b>Minority</b>
Negative Change Borne By	16.1%	30.3%
Area Average	4.2%	41.6%
<b>Delta</b>	<b>11.9%</b>	<b>-10.3%</b>

### Route 301

Route 301 is proposed to be deleted. This route carries about 65 boardings on an average Saturday and only 52 on an average Sunday (FY17). Using the Remix methodology, the service deletion accounts for about two million low-income people-trips and over four million minority people-trips. According to the COA, half of those trips are on the Walnut Creek BART to John Muir Medical Center segment. This segment will now be covered by a more frequent Route 311, which has a better morning and evening span as part of the mitigation for half of the riders. The other segment of the route, from Walnut Creek BART to Rossmoor, also has a general public dial-a-ride option through the community of Rossmoor, which was considered when making a difficult decision to cut Route 301.

### Weekend Service: Positive Impacts

Many of the changes to weekend service result in additional people-trips. An extension to Downtown Clayton of the 310, additional 311 service extended to John Muir Medical Center, and additional Route 320 trips round out the positive impacts of the proposed weekend changes. In total, 21.7% of the new people-trips generated will serve low-income populations, which is greater than their share of the population. Similarly, 58.6% of the new people-trips will benefit minority populations, which also exceeds minorities' share of the population. This was due to the fact that Route 310 was extended to Downtown Clayton, which does not contain high levels of minority or low-income populations, yet does provide access to several trailheads for recreational opportunities for low-income populations near Mt. Diablo.

	<b>Low-Income</b>	<b>Minority</b>
Positive Change Borne By	21.7%	58.6%
Area Average	4.2%	41.6%
<b>Delta</b>	<b>17.5%</b>	<b>17.0%</b>

## Cumulative Effects

As previously discussed, CCCTA's disparate impact and disproportionate burden policies require analysis of the cumulative impacts of major service changes. The Plan would implement changes having both positive and negative effects on people-trips generated by its affected routes. The cumulative effect of the Plan is a net loss of 622,977,372 people-trips annually across the affected routes. However, the Plan results in annual net gains for low-income populations and minority populations within County Connection's service area of 140,066,965 and 373,133,180 respectively. Accordingly, the Plan results in no adverse impacts on either minority or low-income populations.

Where a major service change results in benefits, a disproportionate burden can also occur where non-low-income populations receive 20% more of the benefits than low-income populations, and a disparate impact can occur where non-minority riders receive 20% more of the benefits than minority riders. The Plan does not cause either of these scenarios. To the contrary, minority populations and low-income populations experience a net benefit from the changes proposed, while non-minority and non-low-income riders experience a net loss. This analysis was done separately as comparison to impacts borne by a low-income versus non-low-income, and a comparison with minority to non-minority impacts. Each category independently adds up to the total changes to the County Connection service area. Impacts have been broken out by weekday, weekend, and combined cumulative changes.

Weekday Cumulative Changes				
People-Trips (in Millions)	People Trips Before	People Trips After	Net Change	% Change
Low-Income	6,172.6	6,347.2	48.8	2.8%
Non-Low-Income	31,146.2	30,515.8	(504.8)	-2.0%
Minority	16,015.1	16,459.1	70.2	2.8%
Non-Minority	21,303.8	20,403.8	(526.1)	-4.2%
<b>Total</b>	<b>37,318.9</b>	<b>36,862.9</b>	<b>(455.9)</b>	<b>-1.2%</b>

Weekend Cumulative Changes				
People-Trips (in Millions)	People Trips Before	People Trips After	Net Change	% Change
Low-Income	302.2	267.7	34.5	-11.4%
Non-Low-Income	1,211.2	1,078.7	(201.5)	-10.9%
Minority	680.7	609.8	70.9	-10.4%
Non-Minority	832.7	736.5	(237.9)	-11.5%
<b>Total</b>	<b>1,513.4</b>	<b>1,346.4</b>	<b>(167.0)</b>	<b>-11.0%</b>

Total Cumulative Changes (Weekday and Weekend Combined)				
People-Trips (in Millions)	People Trips Before	People Trips After	Net Change	% Change
Low-Income	6,474.8	6,614.9	140.1	2.2%
Non-Low-Income	32,357.5	31,594.4	(763.0)	-2.4%
Minority	16,695.8	17,068.9	373.1	2.2%
Non-Minority	22,136.5	21,140.4	(996.1)	-4.5%
<b>Total</b>	<b>38,832.3</b>	<b>38,209.3</b>	<b>(623.0)</b>	<b>-1.6%</b>

## Public Comment and Outreach

County Connection staff has completed the public comment process associated with the Service Restructure. (The public comment process also addressed Fare Modification proposals, which will be analyzed separately before Board consideration). Staff conducted six (6) public hearings from June 25<sup>th</sup> through July 25<sup>th</sup>, 2018. Attendance at the meetings ranged from four (4) residents in Pleasant Hill to thirteen (13) residents in San Ramon. In most cases, residents submitted formal comments about the proposal with the exception of Pleasant Hill. In addition to the public hearings, staff also conducted a separate meeting at the San Ramon Senior Center, at the request of city staff. Staff monitored correspondence in the customer service email account and on the website. All questions were answered and misinformation clarified. Below is the summary of the meetings and all comments (from emails, letters, website and public hearings).

### Martinez

Martinez residents were mainly concerned about the elimination of Route 3. However, the Route 28 realignment addressed those concerns. During this meeting we learned about Mt. Diablo's Bridge Program, which assists disabled individuals from 18-22 transition to adult life), and the Program's opposition to the elimination of the free midday fare program. Since then, we have been in contact with a number of teachers to ensure that if the midday free fare is eliminated, their program would not be impacted. Comments submitted: 3

### Lafayette

Residents attending the Lafayette meeting opposed the elimination of Route 25. They expressed reservations about using BART, but recognized that their transit use was limited. One commenter lives on Olympic Blvd and wanted to retain Route 25 service. Comments submitted: 3

### Concord

A couple of Concord residents also had ties to the Mt Diablo School District's Bridge Program and spoke about the field trips taken during 10am-2pm. Additionally, one resident opposed terminating Route 15 at Pleasant Hill BART and also the elimination of Route 315. Comments submitted: 6

### Walnut Creek

The elimination of Route 2 was the main concern for those in attendance at the Walnut Creek Public Hearing. Comments submitted: 6

## **Pleasant Hill**

The Pleasant Hill meeting served as an informational workshop. Those in attendance did not express any concerns about the service restructure. Comments submitted:

## **San Ramon**

Those attending the San Ramon Public Hearing did not express any concerns about the service restructure. One resident addressed the vehicle weight of our buses and the damage it is causing to the roads in his neighborhood. Several other comments were in favor of expanding service in the Windemere Loop and adding frequency to Route 35. Comments submitted: 5

The recurring theme throughout most of the public comment process was opposition to the elimination of the free midday fare program, with the exception of San Ramon. Several attendees at the San Ramon meetings had a different position and expressed a willingness to pay more than the proposed rate for more service. This proposed change will be analyzed in a separate equity analysis concerning potential fare changes.

## **Modifications Made to Proposal Based Upon Public Outreach and Stakeholders**

- Route 15: Extend to John Muir Medical Center Concord
- Route 28: Vista Way/Walmart proposed alignment implemented early in August 2018 in response to Martinez public outreach
- Route 35: Additional Windemere Service due to feedback from public hearing, brief period of 15 minute service in the morning
- Route 310: Extend to Downtown Clayton on weekends
- Route 315: Proposal to eliminate route dropped
- Route 95X: Proposal to align route on Main St in Walnut Creek dropped



Route	Description	Proposed Change	Start	Existing Freq. (m)			End	Start	Proposed Freq. (m)			End	Change?
				AM	MID	PM			AM	MID	PM		
1	Rossmoor to Shadelands via Walnut Creek BART	Increase all day frequency	5:55	60	60	60	7:50	5:44	45	45	45	7:59	Yes
1M	Walnut Creek BART to Marchbanks/JMMC	Delete route	6:23	40	-	40	7:34	X	X	X	X	X	Yes
2	Trotter to Walnut Creek BART	Delete route	6:16	2AM, 2 PM trips			7:14	X	X	X	X	X	Yes
4	Walnut Creek BART to Downtown Walnut Creek	Increase frequency to 12 minutes all day	7:10	15-45	15	15-40	9:46	6:58	12	12	12-30	9:47	Yes
5	Walnut Creek BART to Creekside	No changes	5:48	20	45	20	6:43	5:48	20	45	20	6:43	No
6	Orinda BART to Lafayette BART via Moraga	Add peak service	5:40	40	120	40	8:45	5:43	20	120	20-40	8:44	Yes
7	Pleasant Hill BART to Shadelands via Treat Blvd	No changes	6:22	15	-	15	7:40	6:22	15	-	15	7:40	No
9	Walnut Creek BART to DVC via Pleasant Hill	Streamlined route, increased frequency	5:50	30-50	40-80	40-60	10:43	5:45	50	50	50	10:15	Yes
10	Concord BART to Downtown Clayton	Reduce service to Clayton, new short loop	5:06	30	15-30	30-60	11:03	4:54	30	15-30	15-60	11:06	Yes
11	Concord BART to Pleasant Hill BART via Meadow	No changes	6:04	45	90	45	8:04	6:04	45	90	45	8:04	No
14	Concord BART to Pleasant Hill BART via Detroit	Extend to Walnut Creek BART at 30m freq.	5:52	40	40	40	9:31	5:35	30	30	30	9:50	Yes
15	Concord BART to Walnut Creek BART via PHB	Terminate route at Pleasant Hill BART	5:35	65	65	65	8:44	5:07	60	60	60	7:57	Yes
15-J*	Concord BART to JMMC	Extend Route 15 to Concord JMMC		-	-	-		5:53	60	60	60	7:09	New
16	Concord BART to Martinez AMTRAK via Monument	No changes	5:22	40	40	40	10:05	5:22	40	40	40	10:05	No
17	Concord BART to North Concord BART via Olivera	No changes to weekdays, new weekend svc.	6:15	30	60-75	30-45	7:39	6:15	30	60-75	30-45	7:39	No
18	Pleasant Hill BART to Martinez Amtrak via DVC	Rerouted via Patterson/Oak Park (Route 9)	5:45	80	~80	80	9:32	5:50	80	40	80	9:37	Yes
19	Martinez Amtrak to Concord BART via Pacheco	Streamlined route, increased frequency	6:05	120	120	120	7:53	6:12	90	45	90	7:37	Yes
20	Concord BART to DVC via Sun Valley Mall	Increased Frequency, faster travel time	6:00	15-30	15-30	30	10:22	6:05	15-30	15-30	15-30	10:19	Yes
21	Walnut Creek BART to San Ramon Transit Center	No changes (as of Winter 2018)	5:30	30	60	30-60	11:20	5:30	30	60	30-60	11:20	No
25	Lafayette BART to Walnut Creek BART	Delete route	7:30	60	60-120	60	6:53	X	X	X	X	X	Yes
27	North Concord BART to Arnold Industrial/Bates	New loop route to cover North Concord		-	-	-		6:34	~40	~60	~40	6:24	New
28	Martinez Amtrak to North Concord BART via DVC	Delete east portion from DVC to N.C. BART	5:45	75	60-90	60-90	8:56	7:00	110	55	110	7:35	Yes
35	Dublin BART to San Ramon Transit Center (east)	Increase peak frequencies	6:00	30	60	30	8:17	6:03	15-20	30-60	20	8:38	Yes
35-C*	San Ramon Transit Center to Crow Canyon via CC	New loop route to cover Crow Canyon area						7:08	30-60	-	30-60	6:48	New
36	Dublin BART to San Ramon Transit Center (west)	Delete route, partial 35C coverage	6:20	60	60	60	9:00	X	X	X	X	X	Yes
91X	Concord BART to Airport Plaza/UFCW	No changes	6:21	30	-	30	6:15	6:21	30	-	30	6:15	No
92X	Pleasanton ACE Station to Mitchell Park n' Ride	Delete small portion on Alcosta	5:35	6AM, 6PM trips			7:31	5:35	6AM, 6PM trips			7:31	Yes
93X	Antioch eBART to Walnut Cr. BART via Kirker Pass	No changes	4:37	30	-	30	7:50	4:37	30	-	30	7:50	No
95X	Walnut Creek BART to San Ramon TC via Danville	No changes	6:30	40	-	40	7:15	6:30	40	-	40	7:15	No
96X	Walnut Creek BART to Bishop Ranch	No changes	5:37	10-20	1 trip	10-20	7:39	5:37	10-20	1 trip	10-20	7:39	No
97X	Dublin BART to Bishop Ranch	No changes	6:30	30	-	30	6:14	6:30	30	-	30	6:14	No
98X	Martinez AMTRAK to Walnut Creek BART	Two new peak roundtrips	5:38	~60	~60	~60	7:41	5:38	30	~60	30	7:41	Yes
99X	Martinez Amtrak to North Concord BART (Express)	No changes	5:38	15-30	-	~30	6:29	5:38	15-30	-	~30	6:29	No
627	North Concord BART to Mason Circle	Replaced with Route 27	8:30	1AM, 1 PM trip			3:10	X	X	X	X	X	Yes
600s	Supplemental School Day Service	No changes		varies					varies				No

Appendix A: Matrix of Impacts by Route

Route	Description	Proposed Change	Start	Existing Freq. (m)			End	Start	Proposed Freq. (m)			End	Change?
				AM	MID	PM			AM	MID	PM		
4	Walnut Creek BART to Downtown Walnut Creek	Minor schedule changes	9:20	20	20	20	6:51	9:20	20	20	20	6:45	Yes
6	Orinda BART to Lafayette BART via Moraga	No changes	9:24	90	120	80	6:09	9:24	90	120	80	6:09	No
301	Rossmoor to JMMC via Walnut Creek BART	Delete route, 311 will replace to JMMC	9:25	90	90	90	6:19	X	X	X	X	X	Yes
310	Concord BART to Clayton/Kirker via Clayton Rd	New Washington loop, extend to Clayton	7:25	25	40	40	9:26	7:05	20	40	40	9:31	Yes
311	Concord BART to Walnut Creek BART via PH BART	Add JMMC (311J), increase frequency	7:19	90	90	90	6:54	7:31	80	80	80	7:01	Yes
311-J*	Walnut Creek BART to John Muir Med. Ctr.	Extend from WC BART to JMMC (repl. 301)		-	-	-		9:22	80	80	80	7:06	New
314	Concord BART to DVC via Crescent Plaza	Small schedule change	6:50	40	40	40	8:41	6:51	40	40	40	8:35	Yes
315	Concord BART to Clayton/Treat via Landana	Reduce service, increase PM span	8:20	90	90	90	6:15	8:20	80	80	80	7:05	Yes
316	Pleasant Hill BART to Martinez AMTRAK via DVC	No changes	7:15	80	80	80	8:09	7:15	80	80	80	8:09	No
320	Concord BART to DVC via Diamond Blvd	Better span, frequency most of day	9:45	45	15-45	45	6:59	8:50	40	40	40	6:55	Yes
321	Walnut Creek BART to San Ramon TC via Danville	No changes	7:20	30-60	120	120	10:29	7:20	30-60	120	120	10:29	No

Appendix B: Weekday Title VI Analysis

Route	Before				After				Difference				
	Population (within 1/4 mi)	Low Income	Minority	Annual Trips	Population (within 1/4 mi)	Low Income	Minority	Annual Trips	People-Trips (Population * Trips)	Low Income People-Trips	Minority People-Trips	Change Borne By Low Income	Change Borne by Minorities
1 Rossmoor / Shadelands	13,168	13.5%	30.4%	3,556	13,168	13.5%	30.4%	4,826	30,146,752	4,102,715	9,232,646	13.6%	30.6%
1M BART Walnut Creek / John Muir Med Ct	5,660	19.3%	35.3%	2,540	0			0	-31,681,420	-5,619,562	-10,759,440	17.7%	34.0%
Route 1 and 1/M Negative Changes									-1,534,668	-1,516,847	-1,526,794	98.8%	99.5%
2 Rudgear / BART Walnut Creek	8,817	17.9%	31.3%	1,270	0			0	-22,711,410	-3,899,336	-7,031,990	17.2%	31.0%
Route 2 Negative Changes									-22,711,410	-3,899,336	-7,031,990	17.2%	31.0%
4 Broadway Plaza / BART Walnut Creek	0			0	5,827	22.3%	40.2%	16,510	23,693,374	5,272,299	9,526,270	22.3%	40.2%
Route 4 Positive Changes									23,693,374	5,272,299	9,526,270	22.3%	40.2%
6 Lafayette / Moraga / Orinda (A)	8,242	10.3%	29.6%	4,318	8,242	10.3%	29.6%	4,572	15,030,704	1,560,229	4,467,352	10.4%	29.7%
6 Lafayette / Moraga / Orinda (B)	0			0	0			0	-9,066,784	-939,455	-2,727,960	10.4%	30.1%
6 Lafayette / Moraga / Orinda (C)	0			0	0			0	469,392	42,602	168,402	9.1%	35.9%
Route 6 Positive Changes									6,433,312	663,376	1,907,794	10.3%	29.7%
9 DVC / BART Walnut Creek	23,259	17.6%	39.3%	5,842	20,408	18.8%	41.2%	4,826	-83,186,778	-11,946,071	-29,037,026	14.4%	34.9%
18 AMTRAK / BART Pleasant Hill	29,175	15.7%	39.4%	4,064	31,515	15.0%	38.0%	3,302	-29,844,492	-6,101,110	-14,659,610	20.4%	49.1%
Route 9 and 18 Negative Changes									-113,031,270	-18,047,181	-43,696,636	16.0%	38.7%
10 BART Concord / Clayton (A)	20,959	16.3%	42.4%	9,144	20,959	16.3%	42.4%	4,572	-184,658,508	-31,595,966	-80,979,264	17.1%	43.9%
10 BART Concord / Clayton (B)	17,647	18.8%	44.4%	762	17,237	18.5%	46.9%	5,588	174,922,688	32,758,488	81,986,882	18.7%	46.9%
Route 10 Negative Changes									-9,735,820	1,162,522	1,007,618	-11.9%	-10.3%
14 Monument Blvd	33,043	34.2%	66.8%	6,096	0			0	-391,222,992	-135,360,988	-264,109,200	34.6%	67.5%
14-Monument Blvd	0			0	38,682	32.7%	62.7%	8,128	617,890,560	202,814,315	389,217,408	32.8%	63.0%
15 Treat Blvd (A)	33,553	18.9%	40.8%	4,064	27,424	18.3%	41.4%	3,810	-54,577,742	-9,936,487	-20,397,724	18.2%	37.4%
15 Treat Blvd (B)	0			0	4,522	41.7%	57.1%	3,556	16,080,232	6,711,780	9,178,036	41.7%	57.1%
Route 14 and 15 Positive Changes									188,170,058	64,228,620	113,888,520	34.1%	60.5%
19 AMTRAK / BART Concord	15,258	23.8%	47.3%	2,032	11,858	21.5%	45.1%	2,540	-1,556,004	-1,626,444	-1,615,440	104.5%	103.8%
Route 19 Negative Changes									-1,556,004	-1,626,444	-1,615,440	104.5%	103.8%
20 DVC / BART Concord	11,719	43.0%	72.5%	10,668	11,719	43.0%	72.5%	13,462	54,793,642	23,543,891	39,154,608	43.0%	71.5%
Route 20 Positive Change									54,793,642	23,543,891	39,154,608	43.0%	71.5%
25 BART Lafayette / BART Walnut Creek	8,414	21.1%	31.8%	2,794	0			0	-47,235,364	-9,745,112	-14,911,578	20.6%	31.6%
Route 25 Negative Change									-47,235,364	-9,745,112	-14,911,578	20.6%	31.6%

Appendix B: Weekday Title VI Analysis (continued)

Route	Before			After					Difference			Change Borne By Low Income	Change Borne by Minorities
	Population (within 1/4 mi)	Low Income	Minority	Annual Trips	Population (within 1/4 mi)	Low Income	Minority	Annual Trips	People-Trips (Population * Trips)	Low Income People-Trips	Minority People-Trips		
27 North Concord	0			0	2,344	14.5%	45.9%	4,572	10,716,768	1,551,232	4,924,044	14.5%	45.9%
28 BART North Concord / Martinez	18,171	18.2%	39.7%	3,810	0			0	-135,220,710	-24,367,403	-53,393,340	18.0%	39.5%
28 Martinez-DVC	0			0	18,501	16.4%	38.3%	1,778	65,314,830	10,698,960	25,060,910	16.4%	38.4%
627 Mason Circle	769	10.5%	47.5%	254	0			0	-400,050	-44,536	-191,008	11.1%	47.7%
Route 27, 28, and 627 Negative Changes									-59,589,162	-12,161,748	-23,599,394	20.4%	39.6%
35 BART Dublin / San Ramon (A)	10,723	7.8%	65.9%	4,064	9,983	7.8%	67.4%	5,588	19,054,572	1,456,520	14,176,248	7.6%	74.4%
35 BART Dublin / San Ramon (B)	10,966	6.7%	66.7%	1,524	10,226	6.6%	68.3%	2,032	11,199,368	707,914	8,212,074	6.3%	73.3%
35 Crow (New 35 segment)	0			0	7,148	5.6%	43.8%	2,540	18,155,920	1,017,468	7,945,120	5.6%	43.8%
36 San Ramon / BART Dublin	14,260	7.2%	43.4%	3,810	0			0	-103,247,190	-7,539,018	-44,973,240	7.3%	43.6%
Route 35 and 36 Negative Changes									-54,837,330	-4,357,116	-14,639,798	7.9%	26.7%
92X ACE Express	8,210	11.7%	32.2%	3,302	7,727	12.0%	32.3%	3,302	-1,680,718	-115,635	-525,018	6.9%	31.2%
Route 92X Negative Changes									-1,680,718	-115,635	-525,018	6.9%	31.2%
98X Martinez / BART Walnut Creek	11,794	20.9%	38.0%	4,064	11,794	20.9%	38.0%	4,572	12,019,280	2,495,491	4,527,804	20.8%	37.7%
Route 98X Positive Changes									12,019,280	2,495,491	4,527,804	20.8%	37.7%
All Changes NET)	221,272	16.5%	42.9%	168,656	212,800	17.2%	44.6%	172,212	-26,802,080	45,896,778	62,465,966		

	Low Income	Minority
Negative Change Borne By	16.1%	34.2%
CCCTA Area Average	4.2%	41.6%
Delta	11.9%	-7.4%

	Low Income	Minority
Positive Change Borne By	33.7%	59.3%
CCCTA Area Average	4.2%	41.6%
Delta	29.5%	17.7%

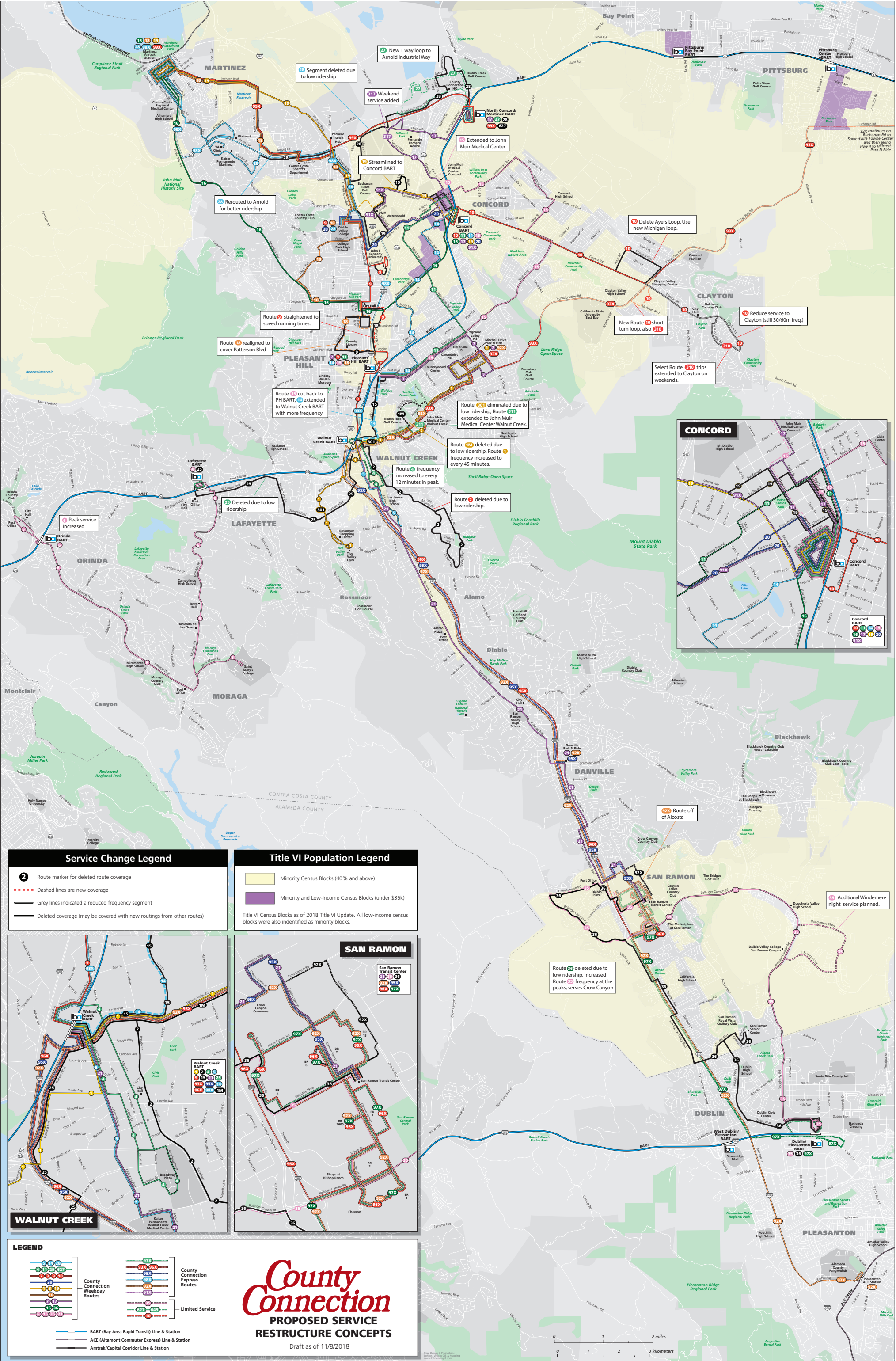
Positive Changes	285,109,666	96,203,676	169,004,996	33.7%	59.3%
Negative Changes	-311,911,746	-50,306,898	-106,539,030	16.1%	34.2%

Appendix B: Weekend Title VI Analysis

Route	Before				After				Difference			Borne By Low Income	Change Borne by Minorities
	Population (within 1/4 mi)	Low Income	Minority	Annual Trips	Population (within 1/4 mi)	Low Income	Minority	Annual Trips	People-Trips (Population * Trips)	Low Income People-Trips	Minority People-Trips		
301 Rossmoor / Ygnacio Valley (A)	10,448	14.9%	30.8%	660	0			0	-14,017,080	-2,071,838	-4,334,880	14.8%	30.9%
301 Rossmoor / Ygnacio Valley (B)	6,776	13.9%	30.0%	110	0			0	-745,360	-103,247	-223,410	13.9%	30.0%
311 BART Concord / BART PH / BART WC	31,968	29.5%	56.7%	880	33,989	28.4%	55.1%	880	3,760,460	399,071	1,110,340	10.6%	29.5%
Route 301 and 311 (Negative Change)									-11,001,980	-1,776,014	-3,447,950	16.1%	31.3%
310 Clayton Rd / BART Concord (A)	16,748	19.8%	48.0%	2,420	19,376	19.2%	46.8%	1,980	-10,742,160	-2,414,205	-4,466,440	22.5%	41.6%
310 Clayton Rd / BART Concord (B)	0			0	19,474	18.0%	45.4%	385	15,566,705	2,662,174	6,824,510	17.1%	43.8%
Route 310 (Positive Change)									4,824,545	247,969	2,358,070	5.1%	48.9%
320 DVC / BART Concord	11,379	44.2%	73.6%	1,540	11,379	44.2%	73.6%	1,650	3,565,650	1,570,671	2,559,150	44.1%	71.8%
Route 320 (Positive Change)									3,565,650	1,570,671	2,559,150	44.1%	71.8%
All Changes (both directions)	138,974	20.0%	45.0%	10,890	139,089	19.9%	45.3%	9,680	-2,611,785	42,626	1,469,270	-1.6%	-56.3%

		Low Income	Minority		Positive	8,390,195	1,818,640	4,917,220	21.7%	58.6%
Negative Change Borne By	16.1%	31.3%			Negative	-11,001,980	-1,776,014	-3,447,950	16.1%	31.3%
Area Average	4.2%	41.6%								
Delta	11.9%	-10.3%								
		Low Income	Minority							
Positive Change Borne By	21.7%	58.6%								
Area Average	4.2%	41.6%								
Delta	17.5%	17.0%								





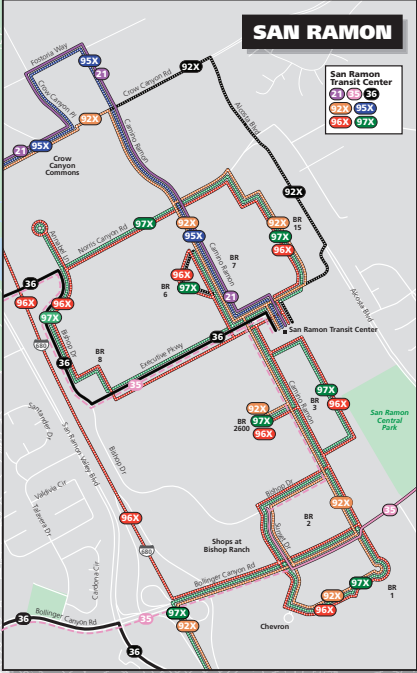
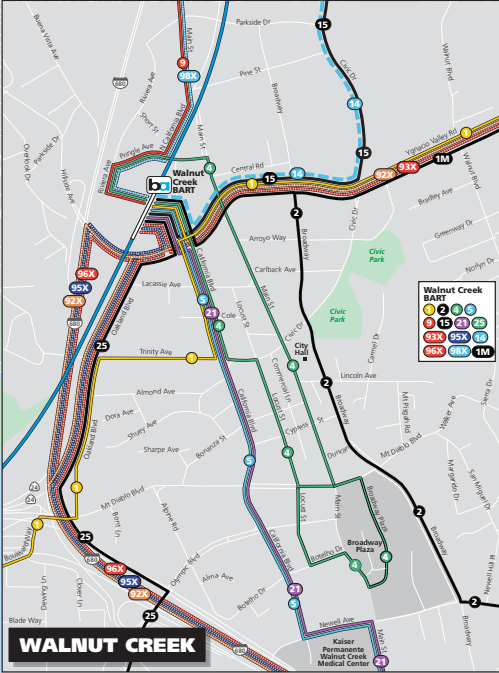
**Service Change Legend**

- 2 Route marker for deleted route coverage
- Dashed lines are new coverage
- Grey lines indicated a reduced frequency segment
- Deleted coverage (may be covered with new routings from other routes)

**Title VI Population Legend**

- Minority Census Blocks (40% and above)
- Minority and Low-Income Census Blocks (under \$35k)

Title VI Census Blocks as of 2018 Title VI Update. All low-income census blocks were also identified as minority blocks.



**LEGEND**

- County Connection Weekday Routes
- County Connection Express Routes
- Limited Service
- BART (Bay Area Rapid Transit) Line & Station
- ACE (Altamont Commuter Express) Line & Station
- Amtrak/Capital Corridor Line & Station

**County Connection PROPOSED SERVICE RESTRUCTURE CONCEPTS**

Draft as of 11/8/2018





**To:** Board of Directors

**Date:** January 8, 2019

**From:** Bill Churchill, Asst. General Manager – Administration

**Review**

Erick Cheung, Chief Financial Officer

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**SUBJECT: Final Fare Structure Proposal and Title VI Fare Equity Analysis**

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**Background:**

Back in April 2018, staff presented a draft version of a proposal to modernize the County Connection fare structure, moving away from paper fare products in favor of promoting Clipper card use. Over the summer, staff conducted the required community outreach for the fare changes across our service area, which was presented to the Board in September 2018. In addition to the required outreach, staff has prepared a Title VI Fare Equity Analysis. If approved by the Board, staff anticipates making the fare changes in March of 2019, which coincides with the proposed implementation of the service restructure. This would allow for significant practical synergies as the fare changes will be represented on all new printed materials that would be updated simultaneously with new route and schedule information. In addition, staff could inform the public of both the new fare and service changes across our various mediums in advance of the restructure.

Mitigation for known impacts, such as a proposal to retain free midday fares for Mt. Diablo School District's BRIDGE adult education program and to distribute preloaded day passes on free Clipper cards, is also included as part of this analysis. No other changes have occurred to the original April 2018 fare proposal.

Details of the entire scope of the fare changes are summarized below, with a detailed proposal included as Attachment 1.

**Summary of Proposed Changes:**

The base cash fare is proposed to increase 50 cents to \$2.50 for adults and 25 cents for senior/disabled to \$1.25. This is viewed as a cash surcharge, as the Clipper fares have no proposed increase. All paper products, including punch cards, paper monthly passes, and paper transfers are proposed to be eliminated. These fare products are intended to be replaced by

Clipper products, such as the Clipper Monthly Pass, Clipper-only transfers, and Clipper-only Day Pass. This is following suit from the transit industry as a whole, including our neighboring agencies such as AC Transit and SFMTA. In addition to moving away from paper products, staff proposes the elimination of the Midday 10am-2pm Free Fare program. A full table of changes is provided below. No changes are proposed to existing Clipper fare products or the single ride ticket.

Proposed Fare Modification			
Fare Type	Existing Cost	Proposed Cost	Details
<b>Cash</b>			
Adults and Youth over 6 years old Local	\$ 2.00	\$ 2.50	Regular routes
Adults and Youth over 6 years old Express	\$ 2.25	\$ 2.50	Express routes (90 series routes) (Express fare to be eliminated and combined with local)
Children under 6 years old	Free	Free	When accompanied by an adult
Senior (65+)/Medicare	\$ 1.00	\$ 1.25	All regular and express routes
Senior (65+)/Medicare 10am-2pm	Free	\$ 1.25	All routes between 10am - 2pm every day (to be eliminated)
Summer Youth	\$ 15.00	-	No changes proposed
<b>Paper Passes (to be eliminated)</b>			
Regular Monthly East Bay Pass	\$ 60.00	-	Unlimited rides for one calendar month on all regular routes on County Connection, TriDelta Transit, Wheels, and WestCAT.
Express Monthly East Bay Pass	\$ 70.00	-	Unlimited rides for one calendar month on all express routes on County Connection, TriDelta Transit, Wheels, and WestCAT.
Adult/Youth 12-Ride Pass	\$ 20.00	-	12 rides on County Connection regular routes (a \$24 value)
Adult/Youth 12-Ride Express Pass	\$ 23.00	-	12 rides on County Connection express routes (a \$27 value)
Senior/RTC/Medicare 20-Ride Pass	\$ 15.00	-	20 rides on regular or express routes (a \$20 value)
Commuter Card	\$ 40.00	-	20 ride on regular routes and 20 BART transfer rides with BART transfer ticket (a \$60 value)
Paper Transfers	Free	-	Paper transfers good for 2 hours weekdays, 3 hours weekends (to be eliminated)
BART Transfer: Adult/Youth	\$ 1.00	-	With BART papertransfer ticket (to be eliminated)
BART Transfer: Senior/RTC/Medicare	\$ 0.50	-	With BARTpaper transfer ticket (to be eliminated)

#### Review of Public Process:

The initial proposal was presented to the Board in April 2018 and staff received authorization to conduct the public hearing process. Staff scheduled six (6) public hearings from June 25<sup>th</sup> to July 25<sup>th</sup> in the following cities: Martinez, Lafayette, Concord, Pleasant Hill, Walnut Creek and San Ramon. Additionally, comments were encouraged via mail, email, phone, and on our website. The comments received were presented at the September Board meeting. In addition to the



public hearing process, the fare proposal requires a Title VI review to ensure low income and minority communities are not disproportionately impacted. Legal counsel has reviewed the public hearing process as well as the Title VI analysis. A full summary of the public process is included as Attachment 2.

#### **Title VI:**

Staff has completed the Title VI analysis based on the final fare proposal. According to circular 4702.1B, issued October 1, 2012 of Title VI of the 1964 Civic Rights act, fare changes are required to undergo a Fare Equity Analysis. As part of our board adopted Major Service Change Policy, fare or service changes must not have more than a 20% disparate impact to minorities or a disproportionate burden to minorities. As per the 2018 Title VI program update adopted by the board, the County Connection service area average was 4.2% (150% federal poverty standard) and 41.6% minority (percent of census blocks with over 40% minorities).

Staff used a ridership base to calculate impacts. The most recent ridership based data is derived from the 2018 Passenger Onboard Survey, which is used to analyze cross tabulations to establish low-income and minority use of each of our fare products to determine if there are any disparate impacts or disproportionate burdens in the fare proposal. While some of the proposed changes result in fare increases on fare products used more by low-income and minority riders, the difference are not large enough to constitute a disparate impact or a disproportionate burden under County Connection's policies. The full Fare Equity Analysis is included as Attachment 3.

#### **Financial Implications:**

Estimated revenue generated by this fare proposal will depend on the level of ridership loss. Staff estimates that ridership may drop between 5-10%, which would equate to an annual increase of revenue between \$500,000 (at a 10% drop) and \$700,000 (at a 5% drop).

#### **Recommendation:**

The O&S Committee requests that the Board approve Resolution 2019-015 which would authorize the General Manager to implement the proposed fare restructure in Spring 2019 and submit the required Title VI service equity analysis to the FTA.

#### **Attachments:**

Attachment 1: Initial Fare Proposal

Attachment 2: Public Outreach Summary

Attachment 3: Title VI Fare Equity Analysis

## **Attachment 1: Initial Fare Proposal**

**Projections updated to reflect FY18 figures. April version used FY17 figures.**

### **Background:**

Current budget projections demonstrate that expenses are increasing more rapidly than known revenue streams resulting in an undesirable loss of reserves. In light of these upcoming budgetary challenges staff has begun the process of exploring potential solutions, one reasonable option is raising the current base fare and potentially restructure the current County Connection fare system. The last time fares were increased was in 2009, nearly ten years ago, as a response to the loss in revenue resulting from the economic crises of 2008.

Although the Board approved a fare increase in 2009, it was really adopting a pre-planned fare increase scheduled to take place in 2010 but implemented one year early due to financial necessity. The last fare increase plan was a five year program with a series of pre-scheduled fare increases that was adopted in 2005. Moving forward staff would not recommend a multi-year plan as part of this work since future fare increases would be anticipated to the Clipper fare structure requiring a coordinated agreement with the other east bay operators. As a result, this body of work will focus solely on the non-Clipper fares, i.e. cash, punch cards, monthly cards and transfers.

Since 2009, many neighboring agencies have either increased cash fares, eliminated transfers, or introduced a cash surcharge to encourage Clipper usage. AC Transit, TriDelta Transit, SolTrans and San Joaquin Regional Transit (SJRTD) have all eliminated transfers and SJRTD have eliminated all paper products. As part of our ongoing review of operations and projected revenue, staff has prepared a detailed fare analyses with the goal of simplifying the fare structure and potentially optimizing revenue while mitigating ridership loss. By restructuring the existing fare system staff anticipates more customers will use the Clipper system resulting in faster boarding times with less disputes between operators and customers. Additionally this will streamline the administrative processes in purchasing, distributing and accounting for a myriad of paper fare products. Staff also expects a larger base of Clipper users will ease the transition to Clipper II. Finally, and most importantly, staff believes this will increase fare revenue bringing budgetary projections more in line with anticipated expenses as well as maintain the Authority's fare recovery ratio such that other revenue streams are not compromised such as new the STA Block Grant.

Due to the complexities of modifying transit fares in the current environment this work represents a coordinated multi departmental effort including the Finance department, Planning

department and the Marketing department. Staff will continue to use multiple disciplines in order to achieve a successful restructuring of the County Connection fare structure.

### **Proposed Modification to the Existing Fare System:**

#### Cash Fares

Adult cash fares are proposed to be raised to \$2.50, with Senior/Disabled local and express rides increasing to \$1.25. This is in contrast to Clipper single fares, which would remain unchanged (\$2 Adult/\$1 Senior). This is in part an effort to increase revenue as well as a cash surcharge to guide our customers to use Clipper, which speeds fare payment and is easier for the drivers as they can continue focusing on operating the vehicle instead of facilitating cash payments. For purposes of our revenue projection, we assume about half of current cash payers will switch to Clipper payment.

#### Transfers

While increasing the cash fare may seem to be the core element of the proposal, the elimination of paper transfers, will have a much bigger impact on our bottom line. Currently, County Connection has a generous paper transfer policy of two hours on weekdays and up to three hours on weekends. This paper transfer slip allows for unlimited rides during this period. Transfers are particularly vulnerability to fraud and result in the highest number of uncomfortable fare disputes between operators and passengers.

Since transfers will still be available to customers through Clipper, the elimination of paper transfers should provide a significant incentive to shift to the use of the Clipper product. Additionally, as customers make the shift to Clipper and begin using the system staff anticipates more customers will realize the savings of the bargain day pass potentially resulting in increased ridership.

In addition to the elimination of bus to bus paper transfers, staff proposes to eliminate the paper BART transfers, which reduces cash fares by \$1.00. This BART transfer discount will still be available automatically when using a Clipper Card from BART to a County Connection bus. As with other transit agencies, no reciprocal BART discount is offered when transferring to BART from a County Connection bus. Commuter Cards are a program to purchase 20 bus rides and 20 BART transfer rides, which is proposed for elimination to be replaced by Clipper.

#### Paper Passes

Before the launch of Clipper, County Connection introduced several paper pass products intended to provide a discount and convenience for frequent users. These products include senior and adult punch cards, a paper adult monthly pass, and commuter cards. For all proposals,

these are proposed to be eliminated as we now have Clipper. This will reduce staff time delivering the paper passes to various vendors and will incentivize the use of Clipper. Staff will promote the Clipper Day Pass to replace many of these paper products.

#### Senior Midday Free

In January 2014, the Senior Midday Free Fare from 10am to 2pm was introduced. Since then, we have heard anecdotally from operators that abuse such as getting a paper transfer from a 'free bus' for subsequent use, as well as other anecdotes that seniors have just shifted trips they already intended to make outside of the free midday. With Clipper, seniors can still ride for only \$1.00 for a single fare, and \$1.75 with Clipper Day Pass. Staff proposes to eliminate the Senior Midday Free Fare from 10am to 2pm.

#### Express Fares

All cash fare increases will subsequently eliminate the current higher fare surcharge for express routes. This will streamline our system and will allow for more seamless use of parallel routes for regular pass holders.

#### Summer Youth Pass

As part of this proposal, the Summer Youth Pass will be modified to become an unlimited pass for \$60 for the whole summer. The previous Youth Pass was a punch card for 20 rides for \$15. This change is proposed to be consistent with our neighboring transit agencies and may induce more ridership due to the unlimited nature of the pass as opposed to youth riders rationing their punch card trips.

#### Clipper

For current Clipper users, nothing will change except the possible elimination of the Senior Midday Free. One issue that will effect revenue is our agreement with the Clipper fare contractor, which charges a transaction fee of around 6% per fare.

County Connection will work to promote Clipper use including the Clipper Only Day Pass, which is automatically loaded when two fares on County Connection, Wheels, Tri-Delta, or WestCat are purchased via your Clipper Card. This is commonly called an accumulator pass, which caps maximum fares. A day pass is \$3.75 for Adults and \$1.75 for Senior/Disabled. Day Passes are underutilized at this time as only about 70 or so day passes are sold per month on our buses. In contrast, nearby properties like SamTrans sell over 15,000 day passes per month. If one takes two buses a day or more per day outside of the transfer window, converting to a day pass from two cash fares will actually be a fare decrease as you save a quarter from current fares and \$1.75 when fares increase to \$2.50, or \$5 for two fares. In addition, the elimination of paper transfers will likely induce more Clipper use as that will be the only way to transfer for free.

For a more simplified summary of the proposed modification please refer to the chart below:

Proposed Fare Modification			
Fare Type	Existing Cost	Proposed Cost	Details
<b>Cash</b>			
Adults and Youth over 6 years old Local	\$ 2.00	\$ 2.50	Regular routes
Adults and Youth over 6 years old Express	\$ 2.25	\$ 2.50	Express routes (90 series routes) (Express fare to be eliminated and combined with local)
Children under 6 years old	Free	Free	When accompanied by an adult
Senior (65+)/Medicare	\$ 1.00	\$ 1.25	All regular and express routes
Senior (65+)/Medicare 10am-2pm	Free	\$ 1.25	All routes between 10am - 2pm every day (to be eliminated)
Summer Youth	\$ 15.00	-	No changes proposed
<b>Paper Passes (to be eliminated)</b>			
Regular Monthly East Bay Pass	\$ 60.00	-	Unlimited rides for one calendar month on all regular routes on County Connection, TriDelta Transit, Wheels, and WestCAT.
Express Monthly East Bay Pass	\$ 70.00	-	Unlimited rides for one calendar month on all express routes on County Connection, TriDelta Transit, Wheels, and WestCAT.
Adult/Youth 12-Ride Pass	\$ 20.00	-	12 rides on County Connection regular routes (a \$24 value)
Adult/Youth 12-Ride Express Pass	\$ 23.00	-	12 rides on County Connection express routes (a \$27 value)
Senior/RTC/Medicare 20-Ride Pass	\$ 15.00	-	20 rides on regular or express routes (a \$20 value)
Commuter Card	\$ 40.00	-	20 ride on regular routes and 20 BART transfer rides with BART transfer ticket (a \$60 value)
Paper Transfers	Free	-	Paper transfers good for 2 hours weekdays, 3 hours weekends (to be eliminated)
BART Transfer: Adult/Youth	\$ 1.00	-	With BART papertransfer ticket (to be eliminated)
BART Transfer: Senior/RTC/Medicare	\$ 0.50	-	With BARTpaper transfer ticket (to be eliminated)

Clipper - No changes proposed			
East Bay Day Pass Accumulator - Adult	\$ 3.75	\$ 3.75	Adults/Youth: Fares on County Connection, TriDelta Transit, Wheels, and WestCAT routes are capped at this maximum daily fare with use of e-cash.
East Bay Day Pass Accumulator - Senior/Disabled	\$ 1.75	\$ 1.75	Senior/Disabled: Maximum daily fare
East Bay Regional 31-day pass - local routes	\$ 60.00	\$ 60.00	Accepted for local bus service on County Connection, TriDelta Transit, Wheels, and WestCAT (except Lynx).
East Bay Regional 31-day pass - express routes	\$ 70.00	\$ 70.00	Accepted for express bus service on County Connection, TriDelta Transit, Wheels, and WestCAT (except Lynx).
BART Clipper transfers - Adult	\$ 1.00	\$ 1.00	Clipper transfer credit automatically given coming from BART.
BART Clipper transfers - Senior/Disabled	\$ 0.50	\$ 0.50	Clipper transfer credit automatically given coming from BART.
Clipper transfers (Internal)	Free	Free	2 hour transfer automatically given on Clipper.

Although the proposed modification to the existing County Connection fare structure and rate is rather bold, it is in keeping with the direction that other transit agencies within the region are already moving to. Additionally it is important to keep in mind this is just an initial proposal that requires a public outreach process as well as a Title VI analyses and a fare equity analyses. Staff will bring back to the committee the results from each of these processes which will also provide the opportunity to modify the proposal as the committee and the Board deems necessary.

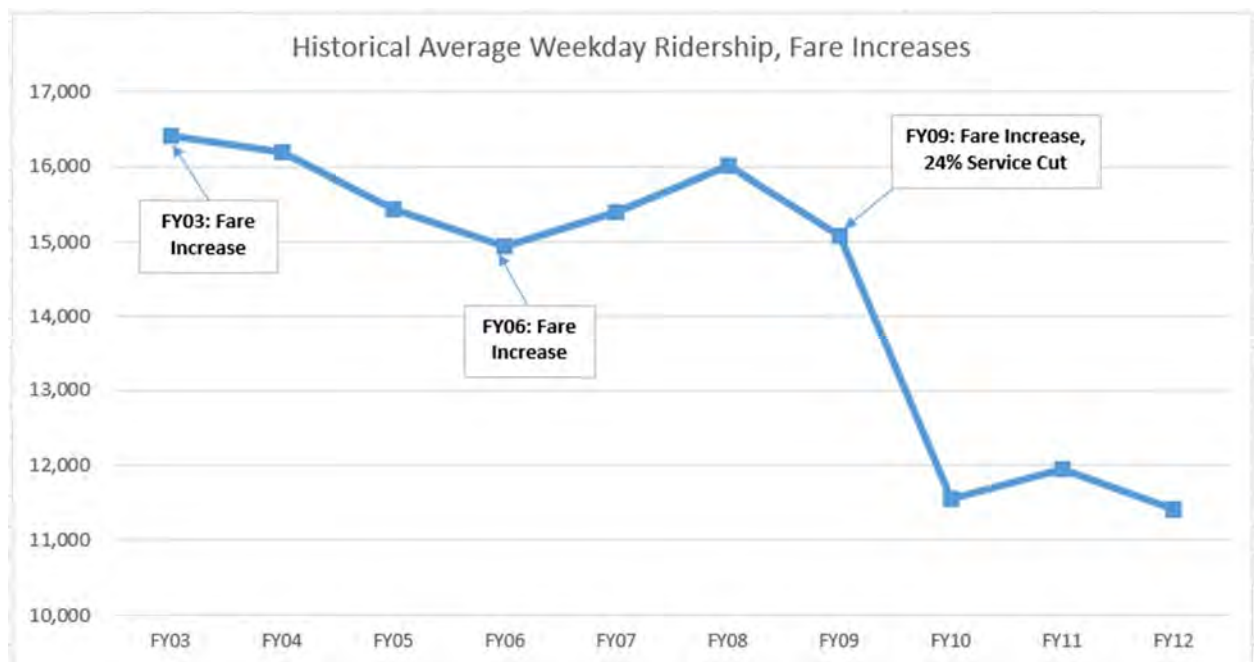
#### **Public Outreach:**

Staff anticipates a high level of public interest and will conduct extensive public outreach. In addition to public meetings and a public hearing, the public will have the opportunity to comment via email, calling customer service, and on all County Connection social media platforms. All information associated with the fare proposal will be readily available on our website. County Connection staff, with the support from legal counsel, will also complete Title VI and a Fare Equity Analysis. Comments received during the public outreach process and all reports will be made available to the committee and the Board before a decision on fares or fare structure is finalized.

#### **Financial Implications:**

There are two significant factors that will have an impact on projected revenues from the proposed modification to the County Connection fare structure. The most difficult factor to estimate is the loss in ridership due to a fare increase. Fare elasticity has long been troublesome for the transit industry given the wide array of variables from income levels, car ownership, gas prices, trip frequency, among others. A frequently-used rule-of-thumb, known as the Simpson – Curtin rule, is that each 3% fare increase reduces ridership by 1%. Like most rules-of-thumb, this

can be useful for rough analysis but it is too simplistic and outdated for detailed planning and modeling. Due to variability and uncertainty it is preferable to use ranges rather than point values for elasticity analysis. Based on the studies reviewed, it is suggested that any time a bus transit agency raises fares there should be an expected reduction of 10 to 25 percent in riders. County Connection has never experienced anything like this after a fare increase, following the fare increase in 2003 ridership fell by 1.3% and following the fare increase in 2006 ridership actually went up by 3.1%. Following the fare increase in 2009 ridership plunged by a large margin but staff links the drop in ridership to the 24% reduction in service provided and not the increase in fares. However, despite County Connection's historically low sensitivity to elasticity, staff does believe there will be a negative impact to raising fares. The current year to date data collected has demonstrated about a 3% drop in ridership without modifying the current fare structure, therefore staff estimates with current ridership erosion that and a fare increase will result in a loss of ridership ranging from 5% to 10%.



The second factor that is difficult to calculate is the rate at which customers will adopt the Clipper card as a result of both the increase of the fares and the elimination of the paper products. Since the Clipper card maintains the benefits of the paper products such as free transfers and has additional products discounting fares such as the day pass as well as the cost per transaction to County Connection for customers using the system, it is imperative for staff to estimate the number of non-Clipper customers making the transition to Clipper. With the absence of significant data to make this calculation staff has estimated that 50% of the non-Clipper passengers will make this transition.

Using these two projections staff estimates projected increase in fare revenue of about \$500,000 assuming a 10% drop in ridership to about \$700,000 assuming ridership only decreases 5%. Since fare elasticity is so difficult to pin down staff believes it is more productive to provide a reasonable range for potential ridership decreases. The following chart provides more detail regarding projected revenue increases. The chart assumes 50 percent of the current non-Clipper users will make the transition to the Clipper system. Additionally as staff conducts more public outreach and conducts a fare equity analyses these assumptions may change. Staff will bring updated financial analyses to the committee if changes are made.

<b>Proposal: Discontinue Paper Products, \$2.50 Adult Cash Fare</b>			
<b>Existing Revenue by Fare Type (FY18)</b>		<b>Estimated Revenue with Ridership Impacts</b>	
Fare Media, (Proposed Changes)	Total Existing Revenue	5% Drop	10% Drop
12 Ride Punch (to be eliminated)	\$ 378,289		
Senior 20 Ride Punch (to be eliminated)	\$ 35,061		
Commute Card (to be eliminated)	\$ 46,336		
Monthly Pass (now Clipper-only)	\$ 136,571	\$ 302,620	\$ 286,693
Midday Free (to be eliminated)	\$ -		
Paper Bus Transfers (to be eliminated)	\$ -		
Paper BART Transfers (to be eliminated)	\$ 99,934		
Clipper	\$ 1,507,208	\$ 2,703,425	\$ 2,561,140
Subtotal (Non-Cash)	\$ 2,203,398	\$ 3,006,045	\$ 2,847,832
Cash	\$ 1,100,805	\$ 1,006,974	\$ 953,976
<b>Total Annual Revenue</b>	<b>\$ 3,304,203</b>	<b>\$ 4,013,020</b>	<b>\$ 3,801,808</b>
<b>Total Additional Revenue</b>		\$ 708,817	\$ 497,605



## **Attachment 2: Public Comments**

- Public Hearings: Although there were few formal comments made during each of the public hearings, all seniors and disabled attendants (15 total) were against the eliminations of the free midday fare. The only exception being attendees at the San Ramon meeting (3 total).
- Online Comments: The online comment section received 10 comments opposing the elimination and 2 in favor.
- BRIDGE: County Connection staff received letters from the teachers of the Mt. Diablo BRIDGE Program advocating for their students and their use of the free midday fare for field trips. County Connection will continue to offer the free midday fare to students in the BRIDGE program, with a valid ID card.

**Attachment 3:**

# **Fare Equity Analysis**

For County Connection's 2019 Service Restructure Plan

**Central Contra Costa Transit Authority**

January 2019

***County Connection***

**Submitted by**

Sean Hedgpeth, Manager of Planning

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## Background

Current budget projections demonstrate that expenses are increasing more rapidly than known revenue streams resulting in an undesirable loss of reserves. In light of these upcoming budgetary challenges, staff has begun the process of raising the current base fare and restructuring the current County Connection fare system. The last time fares were increased was in 2009, nearly ten years ago, as a response to the loss in revenue resulting from the economic crises of 2008.

Since 2009, many neighboring agencies have either increased cash fares, eliminated transfers, or introduced a cash surcharge to encourage usage of Clipper, our regional transit smartcard. AC Transit, TriDelta Transit, SolTrans and San Joaquin Regional Transit (SJRTD) have all eliminated transfers and SJRTD has eliminated all paper products. As part of our ongoing review of operations and projected revenue, staff has prepared a detailed fare analyses with the goal of simplifying the fare structure and potentially optimizing revenue while mitigating ridership loss.

The proposed changes are as follows: 1) raise fares on all single ride cash fares; 2) eliminate all free transfers for cash fares; 3) eliminate all paper passes, consisting of the Regular Monthly East Bay Pass, Express Monthly East Bay Pass, Adult/Youth 12-Ride Passes, Adult/Youth 12-Ride Express Passes, Senior/RTC/Medicare 20-Ride Passes, and Commuter Card; and 4) elimination of free midday fares. No changes are proposed to fares on Clipper, except for the elimination of the free midday fares. Transfers and monthly passes will still be available through Clipper.

By restructuring the existing fare system staff anticipates more customers will use the Clipper system resulting in faster boarding times with fewer disputes between operators and customers. Additionally, this will streamline the administrative processes in purchasing, distributing and accounting for a myriad of paper fare products. Finally, and most importantly, staff believes this will increase fare revenue bringing budgetary projections more in line with anticipated expenses as well as maintain the Authority's fare recovery ratio such that other revenue streams are not compromised.

Prior to approving the fare changes, the Board must review and approve this equity analysis, which assess the impact of each fare change on low-income and minority communities. Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination by recipients of federal financial assistance. The Federal Transit Administration (FTA) further requires that recipients of FTA financial assistance conduct an analysis on all fare changes, including elimination of fare products, to assess the impacts of those changes on low-income and minority populations.

This equity analysis indicates that transfers for cash fares and the passes proposed for elimination are used disproportionately by non-minority and non-low income riders. While cash fares and the Midday Free Fares are used disproportionately by both low-income and minority riders, the disparity does not exceed the thresholds established in CCCTA's disproportionate burden and disparate impact policies. Despite the lack of disparate impact or disproportionate burden, CCCTA is undertaking a series of mitigation measures to offset the impacts of these fare changes on all riders, including low-income and minority riders.

## Title VI Requirements and CCCTA Title VI Policies

In October 2012, the Federal Transit Administration released Circular 4702.1B, which provides guidelines for compliance with Title VI (Circular). Under the Circular, transit operators are required to study proposed fare changes and “major” service changes before the changes are adopted to ensure that they do not have a discriminatory effect based on race, ethnicity, national origin or socio-economic status of affected populations. As a first step, public transit providers must adopt their own “Major Service Change,” “Disparate Impact,” and “Disproportionate Burden,” policies. The three policies, and County Connection's proposals, are described below.

### **Disparate Impact Policy**

#### **Description:**

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on minority populations relative to non-minority populations on the basis of race, ethnicity or national origin.

The threshold is the difference between the burdens borne by, or benefits experienced by, minority populations compared to non-minority populations. Exceeding the threshold means either that a fare or major service change negatively impacts minority populations more than non-minority populations, or that the change benefits non-minority populations more than minority populations. A change with disparate impacts that exceed the threshold can only be adopted (a) if there is substantial legitimate justification for the change, and (b) if no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

#### **Proposed Policy:**

County Connection establishes that a fare change, major service change or other policy has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

### **Disproportionate Burden Policy**

#### **Description:**

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on low-income populations relative to non-low-income populations.

The threshold is the difference between the burdens borne by, and benefits experienced by, low-income populations compared to non-low income populations. Exceeding the threshold means either that a fare or service change negatively impacts low-income populations more than non-low-income populations, or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, County Connection must avoid, minimize or mitigate impacts where practicable.

**Proposed Policy:**

County Connection establishes that a fare change, major service change or other policy has a €disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated.

**Public Outreach:**

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

Meetings:

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

*Comments: None*

## Fare Equity Analysis Methodology

**Methodology**

The Circular requires County Connection to conduct a fare equity analysis for all fare changes, regardless of the amount of increase or decrease, to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations, with a few enumerated exceptions. The exceptions are:

- (i) "Spare the air days" or other instances when a local municipality or transit agency has declared that all passengers ride free.
- (ii) Temporary fare reductions that are mitigating measures for other actions.
- (iii) Promotional fare reductions. If a promotional or temporary fare reduction lasts longer than six months

For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, the fare equity analysis must analyze available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change. The analysis must do the following:

- (i) Determine the number and percent of users of each fare media being changed;
- (ii) Review fares before the change and after the change;
- (iii) Compare the differences for each particular fare media between minority users and overall users; and
- (iv) Compare the differences for each particular fare media between low-income users and overall users.

This analysis analyzes the impacts of the fare changes by comparing the percentage of the low-income riders using each fare product against the percentage of all riders who use the fare product. This metric is the clearest way to identify fare products that are used disproportionately by low-income and/or minority riders.

For a fare product experiencing a price increase, if the difference in the usage percentage by minority riders is greater than the usage percentage by the ridership overall is 20% or greater, a prima facie case of a disparate impact exists. If the difference in the usage percentage by low-income riders is greater than the usage percentage by the ridership overall, a prima facie case of a disproportionate burden exists. Where a prima facie case of a disparate impact exists, CCCTA will identify substantial legitimate justifications for the change and evaluate less discriminatory alternatives for accomplishing those objectives. Where a disproportionate burden exists, CCCTA will identify practical steps to mitigate the impacts and evaluate available alternatives that may have less of a burden on low-income riders.

### Dataset

The equity analysis uses data from County Connection's 2018 Onboard Survey, which was conducted recently in March and April 2018. County Connection retained the consulting firm Nelson Nygaard to conduct an onboard survey, which is required triennially by the Federal Transit Administration. County Connection received 907 responses, of which 783 had income information and 822 had minority status included. 703 responses came from respondents who paid a fare for that route or trip.

This data was weighted with Fiscal Year 2018 annual ridership for each fare category. In some cases, there were fare categories that are recorded on the bus that were not specifically asked about in the onboard survey fare payment question, so those categories were combined when weighting the onboard survey responses to actual reported ridership via our fare category bus data terminals. For

example, the 'cash' category included adult and senior categories as well as express and local. This had to be added together to be indexed to the onboard survey.

Data was first sorted to only compare fare categories that were actually paid. Free bus routes (like Routes 4, 5 and 7) were not included in the analysis due to the fact that those fares did not have any proposed changes.

Additional analysis of the elimination of paper transfers was also conducted. This analysis sorts fare payment and demographic information by number buses respondents took to complete their one-way trip.

## Ridership Based Demographics (2018 Onboard Survey)

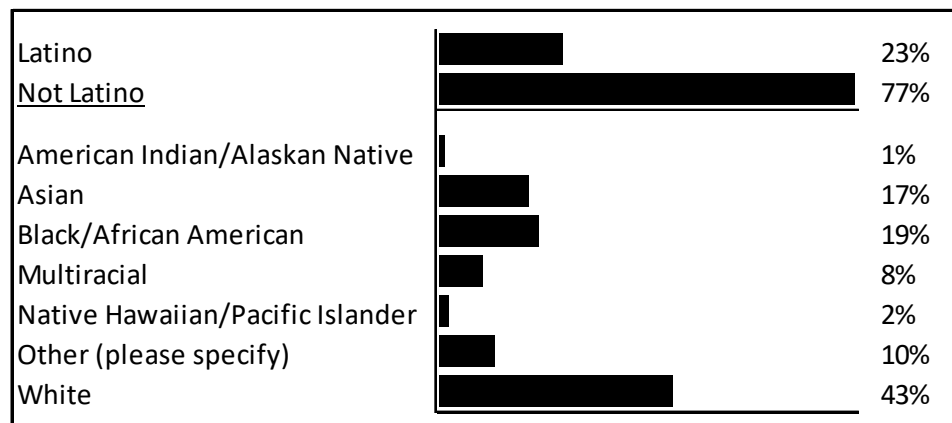
The following graphs form a profile of our ridership that was used for the equity analysis.

*Figure 1, Household Income*



The analysis defines low income populations as persons with a household income of under \$35,000. This is based on the 150% of federal median poverty for a family of four, which is \$36,450. The 2018 Onboard Survey asked riders to identify their income within a range. \$35,000 was the closest threshold to the federal 150% median poverty amount of \$36,450 used in the 2018 Onboard Survey. As shown in figure 1, about 58% of survey respondents who paid a fare are considered low-income.

*Figure 2, Ethnicity and Race*





This analysis defines minority as any survey respondent who was non-white and/or self-identified as a Latino. This includes Latinos who identify racially as "white." In figure 2, one can see that almost one quarter of the ridership who paid a fare self-reported themselves as Latino. In addition to a Latino ethnicity question, survey respondents were asked what race they most identify with. About 63% of fare paying respondents met the criteria for minority status.

Figure 3, Income by Ethnicity and Race

Household Income by Ethnicity and Race					
Ethnicity	Less than \$15,000	\$15,000 to \$34,999	\$35,000 to \$74,999	\$75,000 to \$99,999	\$100,000 or more
Latino	37.8%	33.9%	17.3%	6.3%	4.7%
Not Latino	28.6%	24.7%	27.0%	7.4%	12.3%
Race					
American Indian/Alaskan Native	16.7%	50.0%	33.3%	0.0%	0.0%
Asian	23.3%	16.7%	27.8%	15.6%	16.7%
Black/African American	29.9%	26.2%	27.1%	5.6%	11.2%
Multiracial	28.3%	28.3%	21.7%	4.3%	17.4%
Native Hawaiian/Pacific Islander	8.3%	58.3%	33.3%	0.0%	0.0%
Other (please specify)	47.1%	27.5%	9.8%	7.8%	7.8%
White	33.2%	26.6%	25.4%	5.3%	9.4%

## Proposed Fare Changes

There are five types of changes included in this proposal: 1) increase in cash fares; 2) elimination of transfers for cash fares; 3) elimination of six paper passes; 4) elimination of free midday rides; and 5) restructuring the Summer Youth Pass. There are no proposed changes to Clipper fares or transfers, except that the free midday fares will also affect both cash and Clipper fares. Each change is described in more detail below.

### Increase in Cash Fares

Adult cash fares on regular routes are proposed to be raised from \$2.00 to \$2.50, with express routes increasing from \$2.25 to \$2.50. Senior/Disabled local and express rides increasing from \$1.00 to \$1.25. This is in contrast to Clipper single fares, which would remain unchanged (\$2 Adult/\$1 Senior). Clipper cards are available for purchase for \$3, and are widely available, as further discussed below.

Additionally, an increase to the base fixed route cash fare will trigger raising the ADA paratransit fare from the current \$4.00 per ride to \$5.00 per ride, or double the cost of the base fixed-route fare.

### Elimination of Transfers for Cash Fares

Currently, County Connection has a generous transfer policy. Riders who pay cash receive a paper transfer slip (paper transfer) that allows for unlimited rides on County Connection for two hours on weekdays and three hours on weekends. Riders who pay by Clipper are able to transfer with their

Clipper cards and do not require a paper transfer slip. This proposal would eliminate paper transfers, but not Clipper transfers.

Since transfers will still be available to customers through Clipper, the elimination of paper transfers should provide a significant incentive to shift to the use of the Clipper product. Additionally, as customers make the shift to Clipper and begin using the system, staff anticipates more customers will realize the savings of the bargain day pass, which is only \$3.75 for Adults and \$1.75 for Senior/Disabled for unlimited daily rides, potentially resulting in increased ridership.

In addition to the elimination of bus to bus paper transfers, staff proposes to eliminate the paper BART transfers, which reduces cash fares by \$1.00 coming from a BART train. This BART transfer discount will still be available automatically when using a Clipper Card from BART to a County Connection bus. As with other Bay Area transit agencies, no reciprocal BART discount is offered when transferring to BART from a County Connection bus.

### Paper Passes

Before the launch of Clipper, County Connection introduced several paper pass products intended to provide a discount and convenience for frequent users. These products are senior and adult punch cards, a paper adult monthly pass, and commuter cards. These passes are proposed to be eliminated as we now have Clipper. This will reduce staff time delivering the paper passes to various vendors and will incentivize the use of Clipper. Staff will promote the Clipper Day Pass to replace many of these paper products.

- **Regular Monthly East Bay Pass:** This \$60.00 pass allows for unlimited rides for one calendar month on all regular routes on County Connection TriDelta Transit, Wheels, and WestCAT.
- **Express Monthly East Bay Pass:** This \$70.00 pass allows for unlimited rides for one calendar month on all regular routes on County Connection TriDelta Transit, Wheels, and WestCAT.
- **Adult/Youth 12-Ride Pass:** This \$20.00 pass provides a discount to riders on regular County Connection routes (\$24 value).
- **Adult/Youth 12-Ride Express Pass:** This \$23.00 pass provides a discount to riders on regular County Connection routes (\$27 value).
- **Senior RTC/Medicare 20-Ride Pass:** This \$15.00 pass provides a discount to riders on regular or express County Connection routes (\$20 value).
- **Commuter Card:** This \$40.00 pass provides riders with 20 rides on regular routes and 20 transfers from BART (\$60.00 value).

The Regular Monthly East Bay Pass and Express Monthly East Bay Pass have near equivalent passes available through Clipper, the East Bay Regional 31 Day Pass (local routes) and the East Bay Regional 31-day pass (express routes).

### Senior/Disabled Midday Free

Introduced in January 2014, the Senior/Disabled Midday Free Fare Staff proposes to eliminate the Senior Midday Free Fare from 10am to 2pm. Seniors and persons with disabilities can still ride for only \$1.00 for a single fare, and \$1.75 with Clipper Day Pass.

## Clipper

For current Clipper users, nothing will change except the possible elimination of the Senior/Disabled Midday Free. One issue that will affect revenue is our agreement with the Clipper fare contractor, which charges a transaction fee of around 6% per fare.

County Connection will work to promote Clipper use including the Clipper Only Day Pass, which is automatically loaded when two fares on County Connection, Wheels, Tri-Delta, or WestCat are purchased via a Clipper Card. This is commonly called an accumulator pass, which caps maximum daily fares. A day pass is \$3.75 for Adults and \$1.75 for Senior/Disabled. Day Passes are underutilized at this time as only about 70 day passes are sold per month on our buses. In contrast, SamTrans sell over 15,000 day passes per month. If one takes two buses a day or more per day outside of the transfer window, converting to a day pass from two cash fares will actually be a fare decrease as you save a quarter from current fares and \$1.75 when fares increase to \$2.50, or \$5 for two fares. In addition, the elimination of paper transfers will likely induce more Clipper use as that will be the only way to transfer for free.

For a more simplified summary of the proposed modification please refer to figure 4 below:

Figure 4, Fare Modification Change Table

Proposed Fare Modification			
Fare Type	Existing Cost	Proposed Cost	Details
<b>Cash</b>			
Adults and Youth over 6 years old Local	\$ 2.00	\$ 2.50	Regular routes
Adults and Youth over 6 years old Express	\$ 2.25	\$ 2.50	Express routes (90 series routes) (Express fare to be eliminated and combined with local)
Children under 6 years old	Free	Free	When accompanied by an adult
Senior (65+)/Medicare	\$ 1.00	\$ 1.25	All regular and express routes
Senior (65+)/Medicare 10am-2pm	Free	\$ 1.25	All routes between 10am - 2pm every day (to be eliminated)
Summer Youth	\$ 15.00	-	No changes proposed
<b>Paper Passes (to be eliminated)</b>			
Regular Monthly East Bay Pass	\$ 60.00	-	Unlimited rides for one calendar month on all regular routes on County Connection, TriDelta Transit, Wheels, and WestCAT.
Express Monthly East Bay Pass	\$ 70.00	-	Unlimited rides for one calendar month on all express routes on County Connection, TriDelta Transit, Wheels, and WestCAT.
Adult/Youth 12-Ride Pass	\$ 20.00	-	12 rides on County Connection regular routes (a \$24 value)
Adult/Youth 12-Ride Express Pass	\$ 23.00	-	12 rides on County Connection express routes (a \$27 value)
Senior/RTC/Medicare 20-Ride Pass	\$ 15.00	-	20 rides on regular or express routes (a \$20 value)
Commuter Card	\$ 40.00	-	20 ride on regular routes and 20 BART transfer rides with BART transfer ticket (a \$60 value)
Paper Transfers	Free	-	Paper transfers good for 2 hours weekdays, 3 hours weekends (to be eliminated)
BART Transfer: Adult/Youth	\$ 1.00	-	With BART papertransfer ticket (to be eliminated)
BART Transfer: Senior/RTC/Medicare	\$ 0.50	-	With BARTpaper transfer ticket (to be eliminated)
<b>Clipper (No proposed changes due to required coordination with East Bay Small Operators)</b>			
East Bay Day Pass Accumulator - Adult	\$ 3.75	\$ 3.75	Adults/Youth: Fares on County Connection, TriDelta Transit, Wheels, and WestCAT routes are capped at this maximum daily fare with use of e-cash.
East Bay Day Pass Accumulator - Senior/Disabled	\$ 1.75	\$ 1.75	Senior/Disabled: Maximum daily fare
East Bay Regional 31-day pass - local routes	\$ 60.00	\$ 60.00	Accepted for local bus service on County Connection, TriDelta Transit, Wheels, and WestCAT (except Lynx).
East Bay Regional 31-day pass - express routes	\$ 70.00	\$ 70.00	Accepted for express bus service on County Connection, TriDelta Transit, Wheels, and WestCAT (except Lynx).
BART Clipper transfers - Adult	\$ 1.00	\$ 1.00	Clipper transfer credit automatically given coming from BART.
BART Clipper transfers - Senior/Disabled	\$ 0.50	\$ 0.50	Clipper transfer credit automatically given coming from BART.
Clipper transfers (Internal)	Free	Free	2 hour transfer automatically given on Clipper.

## Potential Adverse Impacts

Each of the proposed changes constitutes an adverse impact, either in the form of a fare increase or the elimination of a discount. In figure 5, the proposed fare changes were compared to the system-wide impacts, which include the fare types that are not proposed to change. The proposed fare changes affect 21% of riders. However, the fare changes affect 28% of minority riders and 27% of low-income riders.

*Figure 5, Disparate Impact and Disproportionate Burden Analysis*

	<b>Fare Changes Borne Impact/Burden</b>	<b>System-wide Average Impact/Burden</b>	<b>Delta</b>
Minority Burden	27.7%	21.4%	+6.3%
Low-Income Impact	26.6%	20.5%	+6.1%

In figure 6 on the following page, this analysis was further broken down by fare type. None of the proposed changes impose a disparate impact or disproportionate burden in any fare type. In fact, low-income and minorities use Clipper 9% and 15% more often than the system-wide numbers for the entire body of ridership.

In figure 7, the fare changes are compared with absolute and percentage changes.

Figure 6, Burden and Impact of Fare Changes by Fare Type

Fare Types	Total Ridership	% of total	Low-Income Total	Disproportionate Burden	Minority Total	Disproportionate Impact
12-Ride Local/Express Punch card	226,520	8.5%	9,139	-7%	8,853	-7%
20-Ride Senior/Medicare Punch card	46,748	1.8%	4,176	-1%	2,149	-1%
Cash <sup>1</sup>	858,782	32.2%	294,510	6%	282,312	4%
Clipper Card <sup>2</sup>	801,706	30.1%	300,351	9%	350,171	15%
Commuter Card	20,050	0.8%	520	-1%	830	-1%
Monthly Pass <sup>3</sup>	91,047	3.4%	4,461	-3%	4,605	-3%
Transfer <sup>4</sup>	371,467	13.9%	28,904	-10%	21,349	-11%
Midday Free <sup>5</sup>	248,300	9.3%	124,150	7%	114,591	5%
<b>Grand Total</b>	<b>2,664,622</b>		<b>766,211</b>		<b>784,858</b>	

<sup>1</sup>Includes Adult and Senior Local/Express Cash (not asked separately), BART transfers (paper discount slip where the difference is made up with cash)

<sup>2</sup>Includes all Clipper products including local/express adult/senior single fares, day pass, monthly pass, Clipper transfers and Bishop Ranch Clipper cards

<sup>3</sup>Paper Monthly Passes only (local and express). Likely smaller due to Clipper Monthly passes being included in the Clipper fare demographic

<sup>4</sup>County Connection Paper Transfers, Select East Bay transfers from outside agencies (Soltrans, Tri-Delta, WestCat, Wheels, FAST)

<sup>5</sup>Midday Free demographic profile obtained from filtering free fare routes and Route 6 St Mary's free fare respondents

Figure 7

Count Fare Type	Cost Existing	Proposed	Change Absolute	Percentage	Usage by Group		
					Low- Income	Minority	Overall
Cash Fare <sup>1</sup>	\$2.00	\$2.50	\$0.50	25%	294,510	282,312	858,782
Paper Transfer <sup>2</sup>	\$0	\$2.00	\$2.00	-----	28,904	21,349	371,467
12 Ride Pass <sup>3</sup>	\$20/\$23	\$24/\$27	\$3	15%/13%	9,139	8,853	225,520
20 Ride Pass	\$15.00	\$20	\$5	33%	4,176	2,149	46,748
Commuter Card	\$40.00	\$60	\$20	50%	520	830	20,050
Monthly Pass <sup>4</sup>	\$60.00/ \$70.00	-----	-----	-----	4,461	4,605	91,047
Midday Fare <sup>5</sup>	\$0	\$1.25 (\$1.00 with Clipper)	\$1.25 (\$1.00 with Clipper)	-----	124,150	114,591	248,300
Clipper <sup>6</sup>	Various	No change	-----	-----	300,351	282,312	858,782
					766,211	784,858	2,664,622

Percentage Fare Type	Cost Existing	Proposed	Change Absolute	Percentage	Usage by Group		
					Low- Income	Minority	Overall
Cash Fare	\$2.00	\$2.50	\$0.50	25%	38.4%	36.0%	32.2%
Paper Transfer	\$0	\$2.00	\$2.00	-----	3.8%	2.7%	13.9%
12 Ride Pass	\$20/\$23	\$24/\$27	\$3	15%/13%	1.2%	1.1%	8.5%
20 Ride Pass	\$15.00	\$20	\$5	33%	0.5%	0.3%	1.8%
Commuter Card	\$40.00	\$60	\$20	50%	0.1%	0.1%	0.8%
Monthly Pass	\$60.00/ \$70.00	-----	-----	-----	0.6%	0.6%	3.4%

<sup>1</sup> The 2018 Onboard Survey did not collect separate statistics for adult and senior cash fares. These figures also include BART transfers.

<sup>2</sup> This figure includes transfers

<sup>3</sup> The 2018 Onboard Survey did not collect separate statistics for express and regular 12-ride passes.

<sup>4</sup> The 2018 Onboard Survey did not collect separate statistics for express and regular monthly passes.

<sup>5</sup> For this equity analysis, onboard survey responses from completely fare free routes 4, 5, and 7 and routes that do not operate during the midday were omitted from the analysis.

<sup>6</sup> Combines all Clipper fares, including single ride, passes, and transfers.

Senior/ Disabled Midday Fare	\$0	\$1.25 (\$1.00 with Clipper)	\$1.25 (\$1.00 with Clipper)	-----	16.2%	14.6	9.3%
Clipper	Various	No change	-----	-----	39.2%	44.6%	33.2%
					100%	100%	100%

The paper transfer increase, and elimination of the 12-ride and 20-ride passes, Commuter Card, and Monthly Passes do not have disparate impacts or disproportionate burdens because they are disproportionately used by non-low-income and non-minority riders.

The increase in the cash fare and the elimination of the senior/disabled midday fare disproportionately affect both low-income and minority riders. In neither case, however, does the difference in usage by low-income riders as compared to the ridership as whole, and minority riders as compared to the ridership as a whole does not exceed the threshold of 20% set forth in CCCTA's disparate impact policy or disproportionate burden policy.

Further analysis of CCCTA's justification for the increases to the cash fare and midday fare, as well as the elimination of the paper transfer, and of mitigation measures to offset the impacts of these changes is set forth below.

## Increase in Paper Fare

There are several substantial legitimate justifications underlying the increase in the paper fare. It is a preferred policy of County Connection to move more transactions to Clipper, which reduces the possibly for fraud and speeds up fare payment and therefore dwell time on buses. A reduction in paper fares will also speed up fare payment, allow drivers to continue focusing on operating the vehicle instead of facilitating cash payments, and reduce administrative burdens on CCCTA such as having to collect the cash from fare boxes. All cash fare increases will eliminate the current higher fare surcharge for express routes. This will streamline our system and will allow for more seamless use of parallel routes for regular pass holders. An increase in Clipper fares will also allow for more accurate data collection. CCCTA has not identified any feasible alternatives to accomplish these legitimate justifications.

There will also be an incidental increase in revenue, though staff projects that a substantial number of riders will switch to Clipper single ride and day passes, avoiding the impact of the fare increase.

In order to mitigate the financial effects of the increase in the paper fare on riders, including low-income and minority riders, CCCTA will engage in a series of promotions to encourage riders to obtain and use Clipper Cards. Further discussion of these efforts are detailed below.

## Elimination of Paper Transfers

The users of paper transfers are disproportionately non-minority and non-low-income as compared to the ridership as a whole. About 54% of riders only need one bus to complete a one-way trip, so the



elimination of paper transfers will not affect them. Non-white riders actually take less transfers than their white counterparts according to the onboard survey. However, low-income riders are about twice as likely to need two or more transfers. Paper transfer riders taking two or more transfers constitute only 18% of all paper transfer riders, and paper transfers make up less than 4% of low-income riders and less than 3% of minority riders, so this affects a very small number of riders.

Figure 8, System-wide Need for Paper Transfers on a One-Way Trip

# of Transfers	%
None	54%
One	28%
Two	14%
Three or more	4%

Figure 9, Number of Paper Transfers by Race/Ethnicity

Number of Transfers Required for One-Way Trip					
Race	None	1	2	3+	Total
American Indian/Alaskan Native	1%	1%	1%	0%	1%
Asian	16%	17%	14%	22%	16%
Black/African American	18%	22%	18%	11%	19%
Multiracial	10%	5%	9%	7%	8%
Native Hawaiian/Pacific Islander	2%	0%	2%	11%	2%
Other (please specify)	9%	10%	11%	26%	10%
White	45%	44%	45%	22%	44%
Ethnicity					
Latino	22%	20%	30%	28%	23%
Not Latino	78%	80%	70%	72%	77%

Figure 10, Number of Paper Transfers by Income

Number of Transfers Required for One-Way Trip					
Income	None	1	2	3+	Total
Less than \$15,000	29%	30%	43%	39%	32%
\$15,000 to \$34,999	24%	28%	31%	35%	27%
\$35,000 to \$74,999	25%	27%	16%	17%	24%
\$75,000 to \$99,999	10%	5%	0%	9%	7%
\$100,000 or more	12%	10%	10%	0%	11%

There are several substantial legitimate justifications for the eliminating the paper transfer. Paper transfers are particularly vulnerable to fraud and result in the highest number of uncomfortable fare disputes between operators and passengers. The elimination of paper transfers, while retaining Clipper

transfers, will further encourage the usage of Clipper. There will also be incidental increases in revenue. CCCTA has not identified any feasible alternatives to accomplish these legitimate justifications.

In order to mitigate the financial effects of the elimination of paper transfers on riders, including low-income and minority riders, CCCTA will engage in a series of promotions to encourage riders to obtain and use Clipper Cards. Further discussion of these efforts are detailed below.

## Elimination of Senior/Disabled Midday 10am-2pm Free Fare

Comparing the percentage of low-income and minority riders using the Midday Free Fare to the ridership as a whole indicates that the Midday Free Fare is used about 50% more frequently by low-income and minority riders. However, when comparing the percentage of low-income riders to non-low-income riders, and the percentage of minority riders to non-minority riders, the usage percentages are quite similar.

*Figure 11, Midday Free Impacts*

Low-income	50.0%
Not Low-Income	50.0%
<b>Delta</b>	<b>0.0%</b>

Minority	46.2%
Non-Minority	53.8%
<b>Delta</b>	<b>-7.7%</b>

There are several substantial legitimate justifications for eliminating the Midday Free Fare. Staff has heard anecdotally from operators that abuse is occurring through this program, such as getting a paper transfer from a 'free bus' for subsequent use. CCCTA is the only transit agency in Contra Costa County offering a similar free fare, so elimination of the fare will promote consistency with other agencies. There will also be an increase in revenue generated by the additional fares.

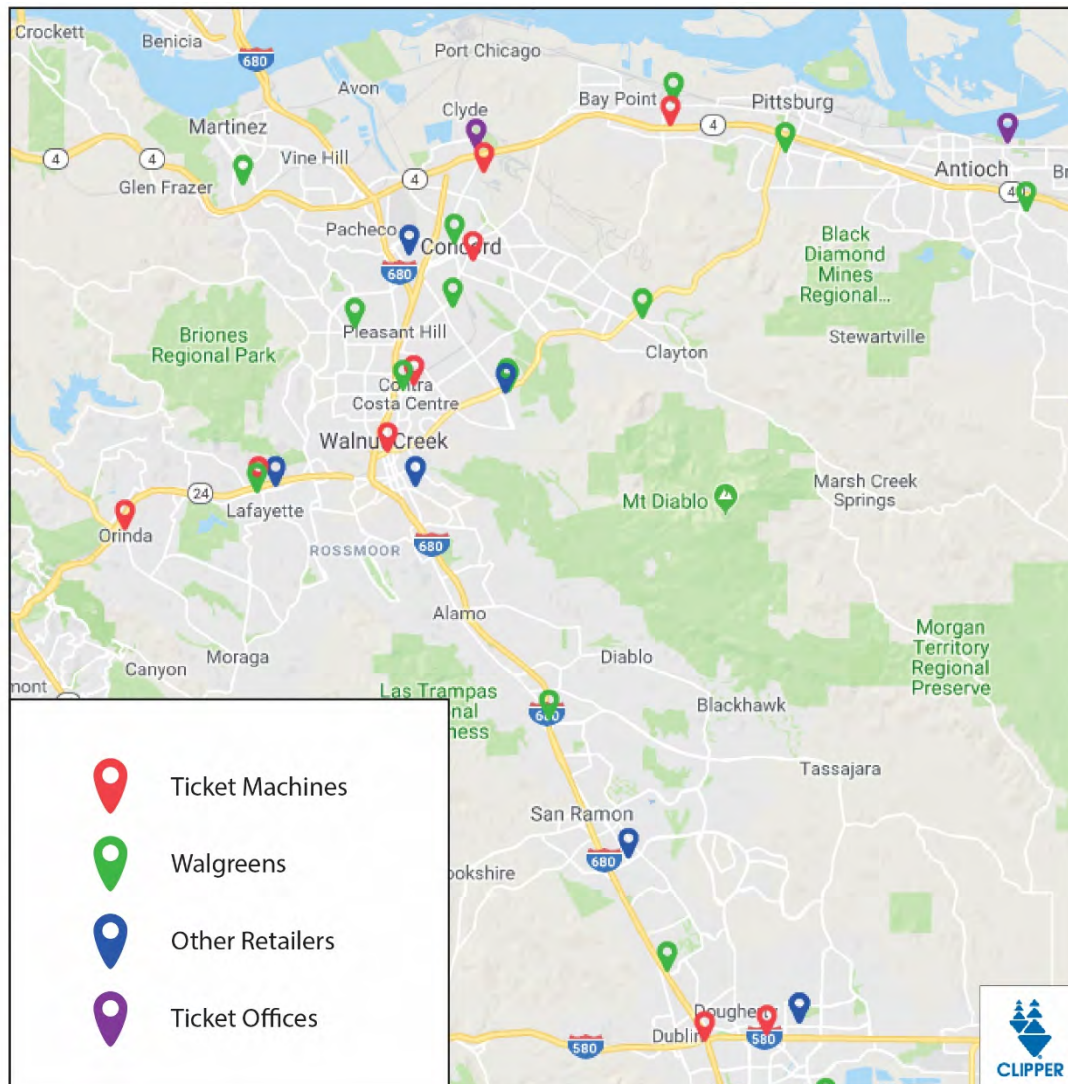
As a mitigation measure, certain populations will be able to continue riding County Connection buses for free under the same terms as the Midday Free program. These free fares will require ID and participation in particular programs, instead of being generally applicable. Currently, the only group participating in this program is the Concord's Bridge Program for disabled adult education, though it may be expanded in the future. This was an issue that was addressed to County Connection as part of our outreach efforts. As the continued midday free fares for certain groups constitute the continuation of an existing fare product, no separate analysis is necessary.

## Clipper Fare Payment Mitigation

Riders should be able to avoid the impacts of the new fare changes by switching to Clipper. Clipper is accessible to all riders, including low-income and minority riders. Cash fare users can add value to their Clipper Cards using cash at a number of Clipper locations.

Clipper Since County Connection's adoption of Clipper in 2015, Clipper locations have steadily expanded across the service area. In January 2018, BART introduced a paper ticket surcharge. As part of this new policy, they have provided Clipper Card machines at all of their stations, including all of the stations in our service area. This creates a very convenient way for cash based passengers to load up a Clipper card with cash at some of our busiest stops. In addition to BART stations, all County Connection member jurisdictions have a Clipper outlet available via a Walgreens or Wholefoods location with the exception of Moraga (pop. 16,016) and Clayton (pop. 10,978), which have all day bus service to a Clipper location.

Figure 12, Map of Clipper Card locations



The 2018 Onboard Survey indicates that almost 40% of low-income riders and 45% of minority riders already use Clipper, which indicates that Clipper is widely available to both low-income and minority riders. The 2018 Onboard Survey likely understates the usage of Clipper. County Connection has already seen Clipper use rise about 5% in total after the introduction of BART's paper ticket surcharge policy in early 2018. This policy went into effect shortly before the surveying for the 2018 Onboard Survey, so the 2018 Onboard Survey results only partially reflect these changes.

There is a \$3 fee to purchase Clipper Card. However, as part of a mitigation to our riders who may not be able to afford the \$3 fee, a promotional program that includes passing out our preloaded day passes on a branded County Connection Clipper Card is planned as part of the rollout of new fare.

## Public Comment and Outreach

County Connection staff has completed the public comment process associated with the Service Restructure and Fare Modification proposals. Staff conducted six (6) public hearings from June 25<sup>th</sup> through July 25<sup>th</sup> in Martinez, Lafayette, Concord, Pleasant Hill, Walnut Creek and San Ramon. Attendance at the meetings ranged from four (4) residents in Pleasant Hill to thirteen (13) residents in San Ramon. In most cases, residents submitted formal comments about the proposal with the exception of Pleasant Hill. In addition to the public hearings, staff also conducted a separate meeting at the San Ramon Senior Center, at the request of city staff. Staff monitored correspondence in the customer service email account and on the website. All questions were answered and misinformation clarified. Below is the summary of the meetings and all comments (from emails, letters, website and public hearings).

The recurring theme throughout most of the public comment process was opposition to the elimination of the free midday fare program, with the exception of San Ramon. Several attendees at the San Ramon meetings had a different position and expressed a willingness to pay more than the proposed rate for more service.

Martinez residents were mainly concerned about the elimination of Route 3. However, the Route 28 realignment addressed those concerns. During this meeting we learned about Mt. Diablo School District's Bridge Program and their opposition to the elimination of the free midday fare program. Since then, we have been in contact with a number of teachers to ensure that if the midday free fare is eliminated, their program would not be impacted. Comments submitted: 3

Residents attending the Lafayette meeting opposed the elimination of Route 25. They expressed reservations about using BART, but recognized that their transit use was limited. One commenter lives on Olympic Blvd and wanted to retain Route 25 service. Comments submitted: 3

A couple of Concord residents also had ties to the Bridge Program and spoke about the field trips taken during 10am-2pm and opposed the elimination of the midday free fare. Additionally, one resident opposed terminating Route 15 at Pleasant Hill BART and also the elimination of Route 315. Comments submitted: 6

The Pleasant Hill meeting served as an informational workshop. Those in attendance did not express any concerns about the fare or service restructure. Comments submitted: 0

The elimination of Route 2 was the main concern for those in attendance at the Walnut Creek Public Hearing. Comments submitted: 6

Those attending the San Ramon Public Hearing did not express any concerns about the fare or service restructure. One resident addressed the vehicle weight of our buses and the damage it is causing to the roads in his neighborhood. Several other comments were in favor of expanding service in the Windemere Loop and adding frequency to Route 35. Comments submitted: 5



# Title VI Fare Equity Analysis

## Monument Free Program

CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
April 2020

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# 1 INTRODUCTION

As a federal grant recipient, the Central Contra Costa Transit Authority (County Connection) is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination by recipients of federal financial assistance. The FTA further requires that recipients of FTA financial assistance conduct an analysis on all fare changes to assess the impacts of those changes on low-income and minority populations.

County Connection is proposing the continuation of a pilot program offering free fares on weekday Routes 11, 14, and 16, as long as funding remains available for the program through the Low Carbon Transit Operations Program (LCTOP) or another similar funding source. This analysis also analyzes the impacts of the potential discontinuation of the program in the event that funds are no longer available.

As the free fare program will reduce the fares on these routes, implementation of the program is a fare change requiring an equity analysis under the FTA's Title VI regulations. Conversely, discontinuation of the program is a fare increase requiring an equity analysis under the FTA's Title VI regulations. As the ridership of the affected routes are similar to the ridership of the system as a whole, the equity analysis indicates that there is no disparate impact based on race, and no disproportionate burden on low-income riders from either the implementation or discontinuation of the program.

# 2 TITLE VI POLICIES

In October 2012, the FTA released Circular 4702.1B (Circular), which provides guidelines for compliance with Title VI. Under the Circular, transit operators are required to study proposed fare changes and “major” service changes before the changes are adopted to ensure that they do not have a discriminatory effect based on race, color, national origin or low-income status of affected populations. As a first step, public transit providers must adopt their own “Major Service Change,” “Disparate Impact,” and “Disproportionate Burden,” policies. County Connection’s Board of Directors adopted these policies in June 2013. The adopted Disparate Impact and Disproportionate Burden policies, which apply to fare equity analyses, are described below.

## 2.1 Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on minority populations relative to non-minority populations on the basis of race, ethnicity or national origin.



The threshold is the difference between the burdens borne by, or benefits experienced by, minority populations compared to non-minority populations. Exceeding the threshold means either that a fare or major service change negatively impacts minority populations more than non-minority populations, or that the change benefits non-minority populations more than minority populations. A change with disparate impacts that exceed the threshold can only be adopted (a) if there is substantial legitimate justification for the change, and (b) if no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin

County Connection establishes that a fare change, major service change or other policy has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

## **2.2 Disproportionate Burden Policy**

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on low-income populations relative to non-low-income populations.

The threshold is the difference between the burdens borne by, and benefits experienced by, low-income populations compared to non-low income populations. Exceeding the threshold means either that a fare or service change negatively impacts low-income populations more than non-low-income populations, or that the change benefits non-low-income populations more than low-income populations. If the threshold is exceeded, County Connection must avoid, minimize or mitigate impacts where practicable.

County Connection establishes that a fare change, major service change or other policy has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated.

## **2.3 Public Outreach**

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

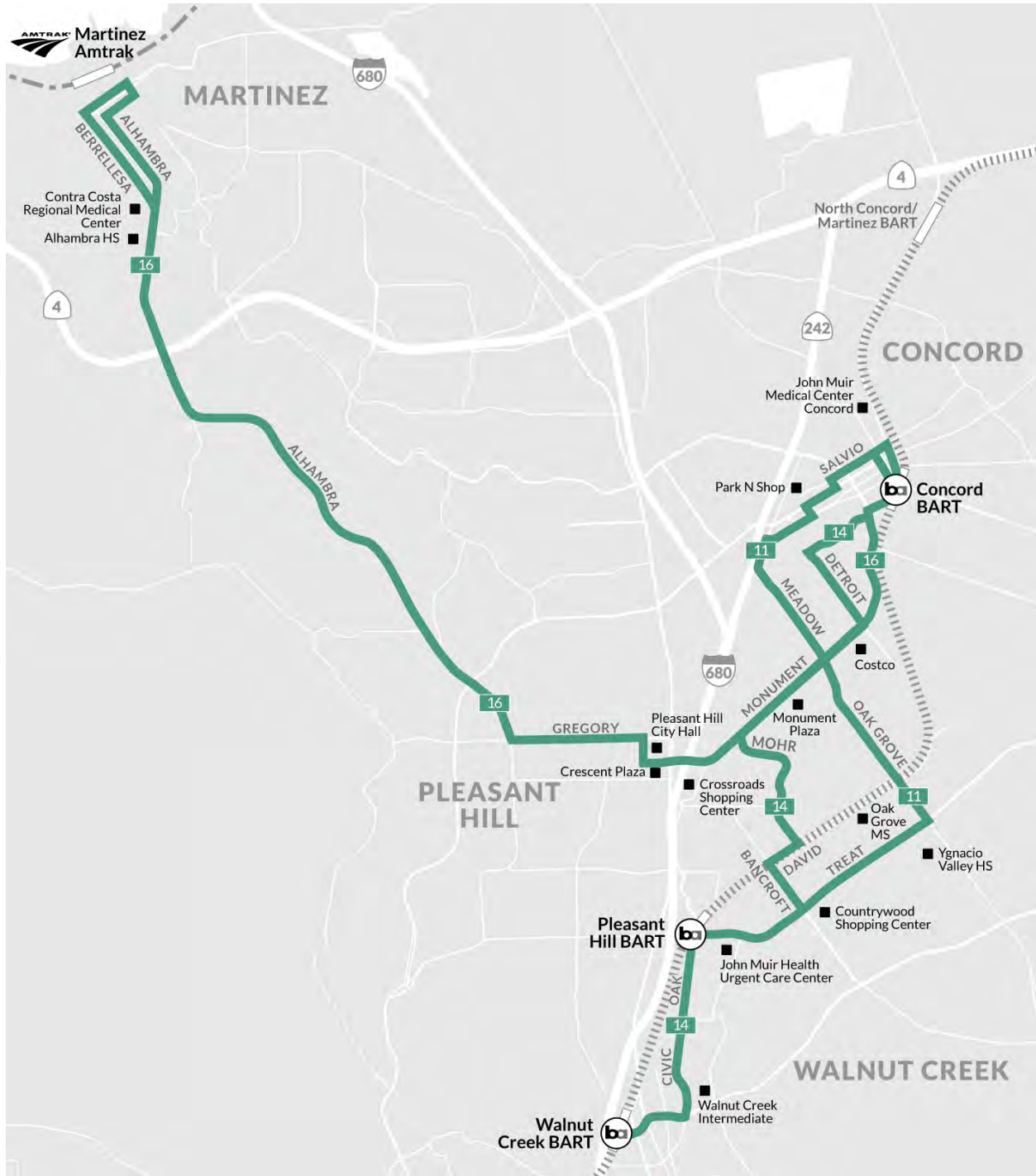
*Comments: None*

### 3 PROPOSAL DESCRIPTION

On July 1, 2019, County Connection began offering free fares as a pilot program on weekday Routes 11, 14, and 16. These routes serve low-income communities along the Monument Corridor and connect from Concord BART to various destinations in Martinez, Pleasant Hill, and Walnut Creek, including BART stations, Martinez Amtrak and Contra Costa Regional Medical Center. Figure 1 shows a map of the three routes.

The pilot project is being funded by a grant through California’s Low Carbon Transit Operations Program (LCTOP), which distributes cap-and-trade proceeds to support a wide range of programs and projects that reduce greenhouse gas emissions and deliver other economic, environmental, and public health benefits for Californians, with a priority on benefitting low-income and disadvantaged communities. LCTOP is one of several programs that are a part of the Transit, Affordable Housing, and Sustainable Communities Program established by the California Legislature in 2014 by Senate Bill 862.

Figure 1: Monument Free Route Map



The goal of the pilot was to increase ridership and make transit more accessible and affordable, particularly to low-income communities along the Monument Corridor. Over the first six months of the pilot, average daily ridership on Routes 11, 14, and 16 increased 54.6% compared to the same period the prior year (see Table 1). Given the program's success, County Connection is proposing to continue

the program, as long as funding remains available through LCTOP or another similar funding source. The program is subject to termination if funding becomes unavailable in the future.

**Table 1: Monument Free Average Daily Ridership by Route**

	Jul – Dec 2018	Jul – Dec 2019	% Change
Route 11	305	409	34.0%
Route 14	568	1,134	99.5%
Route 16	660	828	25.4%
<b>Total</b>	511	790	54.6%

## 4 EQUITY ANALYSIS

A reduction in fare is a fare change pursuant to the Circular. Accordingly, the equity analysis requirement applies. As a reduction in fare is a benefit, the relevant disparate impact analysis examines the allocation of benefits from the fare reduction among minority riders on the affected routes relative to their share of the ridership as a whole. Similarly, the relevant disproportionate burden analysis examines the allocation of benefits from the fare reduction among low-income riders on the affected routes relative to their share of the ridership as a whole.

Conversely, the elimination of a free fare program results in a fare increase, which is a fare change pursuant to the Circular. A fare increase is a burden, though the same analytical framework applies as in the fare reduction.

### 4.1 Data and Methodology

#### Methodology

The Circular requires County Connection to conduct a fare equity analysis for all fare changes, regardless of the amount of increase or decrease, to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations, with a few enumerated exceptions. The exceptions are:

- (i) “Spare the air days” or other instances when a local municipality or transit agency has declared that all passengers ride free.
- (ii) Temporary fare reductions that are mitigating measures for other actions.

(iii) Promotional fare reductions. If a promotional or temporary fare reduction lasts longer than six months, then FTA considers the fare reduction permanent and the transit provider must conduct a fare equity analysis.

For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, the fare equity analysis must analyze available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change.

Both the disparate impact policy and the disproportionate burden policy examine the cumulative impacts of a fare change. As a result, this analysis determines potential impacts of the proposed program by comparing the percentages of low-income and minority riders who use Routes 11, 14, and 16 based on relative ridership against the percentages of low-income and minority riders who use the system as a whole. These metrics will identify whether low-income and/or minority riders would experience a disproportionately lower benefit due to the free fares program.

### Definitions

**Minority** – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

**Low-Income** – FTA defines a low-income person as a person whose household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. However, FTA encourages the use of any locally developed threshold provided that the threshold is at least as inclusive as the HHS poverty guidelines. Due to the area's higher cost of living, County Connection defines low-income as 150% of the federal poverty level.

### Data Source

An onboard passenger survey was conducted on County Connection buses in October 2019, four months into the pilot program, and a total of 1,188 responses were collected. The survey was conducted on both weekdays and weekends using handheld tablet personal computers on which the online survey was administered. A sampling plan was developed to ensure that the distribution of completed surveys mirrored the actual distribution of passengers using the system. The plan included completion goals that were set by route and time period based on ridership. Because the number of surveys collected on each route is based on relative ridership, the percentages of low-income and minority riders for the Monument Free Program overall were determined by summing up the numbers from the surveys across all three routes.

The survey data provides demographic information on County Connection’s riders, including race and income, by route. Respondents who declined to answer questions about income or ethnicity are excluded from the analysis. In order to protect privacy, survey respondents were asked to report their income bracket as opposed to their specific income. Because of this, the analysis uses the midpoint of the selected income bracket to compare against the federal poverty level. Table 2 below shows how low-income status—defined in this analysis as 150% of the 2019 federal poverty guidelines—is determined based on household size and income bracket. Using these thresholds, each individual survey response was categorized as either low-income or non-low-income based on responses to the questions about household size and income.

**Table 2: Low-Income Thresholds by Household Size**

Household Size	Low-Income Threshold
1-2	Under \$25,000
3-4	Under \$35,000
5-7	Under \$50,000
8-10	Under \$75,000

## 4.2 Impact Assessment

Based on the onboard survey data, 56.1% of all County Connection riders identify as minority, and 44.4% are considered low-income. On the three routes that would be free under the Monument Free Program, 58.9% of riders identify as minority and 43.2% are low-income. This is relatively consistent with a previous onboard survey that was conducted in 2015, in which 58.0% of riders identified as minority and 48.0% were low-income, although it should be noted that Route 14 was restructured in March 2019.

### Implementation

There is no disparate impact on minority riders from the implementation of the Monument Free Program. The routes that benefit from the program have a slightly higher minority ridership (58.9%) than the system as a whole (56.1%) by a margin of 2.8%.

There is also no disproportionate burden on low-income riders from the implementation of the Monument Free Program. The usage of the affected routes by low-income riders is slightly lower (43.2%) than their share of the ridership on the system as a whole (44.4%). However, the differential of 1.2% is well within the 20% threshold set forth in the disproportionate burden policy. Notably, this program is funded by a grant intended to deliver environmental benefits to low-income communities.

Transit fare subsidies is one of the eligible types of projects under the grant. In addition, the routes under the Monument Free Program serve AB 1550 low-income communities and a MTC community of concern (COC), further supporting one of the main goals of the grant, which is to improve mobility for disadvantaged and low-income communities.

**Table 3: Impact Analysis Results**

	% Minority	% Low-Income
Route 11	58.3%	41.7%
Route 14	65.8%	59.0%
Route 16	51.5%	25.0%
<b>Monument Free Program Total</b>	<b>58.9%</b>	<b>43.2%</b>
Systemwide	56.1%	44.4%
<b>Difference from Systemwide</b>	<b>2.8%</b>	<b>-1.2%</b>

#### Discontinuation

There would be no disparate impact on minority riders from the discontinuation of the Monument Free Program. The discontinuation would result in a fare increase that would burden routes that have a slightly higher minority ridership (58.9%) than the system as a whole (56.1%) by a margin of 2.8%, though this differential is well within the 20% threshold set forth in the County Connection disparate impact policy.

The discontinuation of the program would also have no disproportionate burden on low-income riders. The usage of the affected routes by low-income riders is slightly lower (43.2%) than their share of the ridership on the system as a whole (44.4%).

Notably, the discontinuation of the program would result in a fare increase, but the increase would place the affected riders in the same position as riders on the system as a whole.

## 5 PUBLIC OUTREACH

#### Implementation

As part of the initial pilot, staff launched a bilingual marketing campaign to inform riders of the new free fare program on Routes 11, 14, and 16. This included notices and “Take One” information cards on vehicles, posters distributed to community partners, information on County Connection’s website, and

social media posts on Twitter, Facebook, Instagram, and NextDoor. Staff also conducted outreach at community based organizations, including Monument Crisis Center, Monument Impact, senior centers throughout Concord and Martinez, and schools, as well as in-person outreach at major bus stops and BART stations. Table 4 shows a summary of outreach efforts during the initial pilot.

**Table 4: Monument Free Outreach Events**

Date	Location
July 15, 2019	Monument Crisis Center
July 16, 2019	Monument Crisis Center
August 7, 2019	Concord BART
August 8, 2019	Concord BART
August 14, 2019	Pleasant Hill BART
August 15, 2019	Pleasant Hill BART
August 16, 2019	Ygnacio Valley High School
August 21, 2019	Concord Senior Center
September 3, 2019	Monument Crisis Center
September 5, 2019	Monument Crisis Center
September 5, 2019	Ygnacio Valley High School
September 6, 2019	Monument Crisis Center
September 10, 2019	Monument Crisis Center
September 11, 2019	Monument Crisis Center
December 11, 2019	Martinez Senior Center
December 17, 2019	Monument Crisis Center
December 19, 2019	Monument Crisis Center
January 21, 2020	Monument Crisis Center
January 22, 2020	Martinez Senior Center
January 30, 2020	Monument Crisis Center



### Discontinuation

In the event funds are no longer available to support the program, staff will conduct public outreach prior to discontinuation of the program.

## **5.1 Public Comment**

### Implementation

In February 2020, staff began outreach to receive public comment on the proposed continuation of the pilot program. The public was able to comment on the proposed changes at a public hearing on April 16, 2020, as well as via mail, email, and online through County Connection's website.

Notices for the public hearing were placed on all buses, as well as in the East Bay Times, and information about the proposed continuation of the program was available on County Connection's website and announced through social media.

A total of 31 comments were received: 25 comments were in favor of continuing the program, and 4 comments were opposed or suggested modifications to the program, such as charging a nominal fare. Two (2) comments either took no position or were unrelated to the proposal.

### Discontinuation

In the event funds are no longer available to support the program, staff will solicit public comment prior to discontinuation of the program.



# Title VI Fare Equity Analysis

## Clipper START & Youth Fare

CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
November 2020

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# 1 INTRODUCTION

As a federal grant recipient, the Central Contra Costa Transit Authority (County Connection) is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination by recipients of federal financial assistance. The FTA further requires that recipients of FTA financial assistance conduct an analysis on all fare changes to assess the impacts of those changes on low-income and minority populations.

County Connection is proposing a one-year pilot program offering a 20% discount on single-ride Clipper fares for eligible low-income adults as part of the regional Clipper START program, and for youth ages 6-18. The Metropolitan Transportation Commission (MTC) will be providing funding during the one-year pilot to offset some of the fare revenue losses from the Clipper START program. Towards the end of the pilot period, County Connection will conduct an evaluation of both the Clipper START and youth fare discounts to determine whether they should be continued and if there is funding available to continue to offset revenue losses.

As this program will reduce the fares for certain riders, implementation of the program is a fare change requiring an equity analysis under the FTA's Title VI regulations. The following equity analysis indicates that there is no disparate impact based on race, and no disproportionate burden on low-income riders from either of the proposed fare discounts.

# 2 TITLE VI POLICIES

In October 2012, the FTA released Circular 4702.1B (Circular), which provides guidelines for compliance with Title VI. Under the Circular, transit operators are required to study proposed fare changes and "major service changes" before the changes are adopted to ensure that they do not have a discriminatory effect based on race, color, national origin or low-income status of affected populations. As a first step, public transit providers must adopt their own "Major Service Change," "Disparate Impact," and "Disproportionate Burden," policies. County Connection's Board of Directors adopted these policies in June 2013. The adopted Disparate Impact and Disproportionate Burden policies, which apply to fare equity analyses, are described below.

## 2.1 Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on minority populations relative to non-minority populations on the basis of race, ethnicity or national origin.

The threshold is the difference between the burdens borne by, or benefits experienced by, minority populations compared to non-minority populations. Exceeding the threshold means either that a fare or major service change negatively impacts minority populations more than non-minority populations, or that the change benefits non-minority populations more than minority populations. A change with disparate impacts that exceed the threshold can only be adopted (a) if there is substantial legitimate justification for the change, and (b) if no other alternatives exist that would serve the same legitimate objectives with less disproportionate effects on the basis of race, color or national origin

County Connection establishes that a fare change, major service change or other policy has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives with less disproportionate effects on the basis of race, color or national origin.

## 2.2 Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on low-income populations relative to non-low-income populations.

The threshold is the difference between the burdens borne by, and benefits experienced by, low-income populations compared to non-low income populations. Exceeding the threshold means either that a fare or service change negatively impacts low-income populations more than non-low-income populations, or that the change benefits non-low-income populations more than low-income populations. If the threshold is exceeded, County Connection must avoid, minimize or mitigate impacts where practicable.

County Connection establishes that a fare change, major service change or other policy has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations, unless avoiding, minimizing, or mitigating the disproportionate effects is impracticable.

## 2.3 Public Outreach

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

*Comments: None*

## 3 PROPOSAL DESCRIPTION

In May 2018, MTC approved implementation of a pilot Regional Means-Based Fare Program (later named Clipper START) to provide discounted fares for low-income adults. The initial 18-month pilot, which launched in July 2020, was limited to four of the larger transit systems in the Bay Area: BART, Caltrain, Golden Gate, and Muni. Adults (ages 19-64) with incomes at or below 200% of the federal poverty level are eligible for the discount, which is provided using a specially encoded Clipper card. MTC is providing funding to partially offset the cost of the program.

Due to the COVID-19 pandemic, MTC has elected to use funds from the Coronavirus Aid, Relief, and Economic Security (CARES) Act to expand the Clipper START program to other transit operators in the region, including County Connection.

County Connection is proposing to join the Clipper START program and offer a discount of 20% off the regular, single ride Clipper fares for qualifying individuals on local routes, express routes, and BART transfers. Since the program is limited to adults and County Connection does not offer a discounted fare for youth, staff is also proposing the implementation of a 20% discount off the regular, single ride Clipper fare for youth riders (ages 6-18) when using a Youth Clipper card. Table 1 below summarizes the proposed discounts.

All cash fares, as well as passes on Clipper, will remain the same. Fares would also remain unchanged for low-income riders who elect not to apply for the Clipper START discount, as well as youth who choose not to use a Youth Clipper card. Seniors (ages 65+) and people with disabilities would continue to receive a 50% discount, and children under 6 will continue to ride free.

**Table 1: Proposed Fare Discounts**

Fare Type	Current Clipper Fare	Proposed Clipper START & Youth Fare
Local route	\$2.00	\$1.60
Express route	\$2.25	\$1.80
BART transfer	\$1.00	\$0.80

If approved, County Connection would begin offering the Clipper START and youth fare discounts as a one-year pilot starting in January 2021. The program will be evaluated in partnership with MTC and the other participating operators to determine the feasibility and potential funding sources for continuing the program beyond December 2021. Due to current uncertainty around schools reopening and ridership demand among youth, the pilot period for the youth fare discount may need to be adjusted in order to ensure adequate usage data is available for evaluation.

## 4 EQUITY ANALYSIS

A reduction in fare is a fare change pursuant to the Circular. Accordingly, the equity analysis requirement applies. As a reduction in fare is a benefit, the relevant disparate impact analysis examines the allocation of benefits from the fare reduction among minority riders who qualify for the discount relative to their share of the ridership as a whole. Similarly, the relevant disproportionate burden analysis examines the allocation of benefits from the fare reduction among low-income riders relative to their share of the ridership as a whole.

## 4.1 Data and Methodology

### Methodology

The Circular requires County Connection to conduct a fare equity analysis for all fare changes, regardless of the amount of increase or decrease, to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations, with a few enumerated exceptions. The exceptions are:

- (i) “Spare the air days” or other instances when a local municipality or transit agency has declared that all passengers ride free.
- (ii) Temporary fare reductions that are mitigating measures for other actions.
- (iii) Promotional fare reductions. If a promotional or temporary fare reduction lasts longer than six months, then FTA considers the fare reduction permanent and the transit provider must conduct a fare equity analysis.

For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, the fare equity analysis must analyze available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change.

Both the disparate impact policy and the disproportionate burden policy examine the cumulative impacts of a fare change. As a result, this analysis determines potential impacts of the proposed program by comparing the percentages of low-income and minority riders who would qualify for each discount based on relative ridership against the percentages of low-income and minority riders who use the system as a whole. These metrics will identify whether low-income and/or minority riders would experience a disproportionately lower benefit due to the fare discount program.

### Definitions

**Minority** – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

**Low-Income** – FTA defines a low-income person as a person whose household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. However, FTA encourages the use of any locally developed threshold provided that the threshold is at least as inclusive as the HHS poverty guidelines. This analysis defines low-income as 200% of the federal poverty level, which is the same threshold that will be used to determine eligibility for the proposed Clipper START discount.



## Data Sources

### *Onboard Passenger Survey*

An onboard passenger survey was conducted on County Connection buses in October 2019 and a total of 1,188 responses were collected. The survey was conducted on both weekdays and weekends using handheld tablet personal computers on which the online survey was administered. A sampling plan was developed to ensure that the distribution of completed surveys mirrored the actual distribution of passengers using the system. The plan included completion goals that were set by route and time period based on ridership.

The survey data provides demographic information on County Connection’s riders, including race and income. Respondents who declined to answer questions about income or ethnicity are excluded from the analysis. In order to protect privacy, survey respondents were asked to report their income bracket as opposed to their specific income. Because of this, the analysis uses the midpoint of the selected income bracket to compare against the federal poverty level. Table 2 below shows how low-income status—defined in this analysis as 200% of the 2020 federal poverty guidelines—is determined based on household size and income bracket. Using these thresholds, each individual survey response was categorized as either low-income or non-low-income based on responses to the questions about household size and income.

**Table 2: Low-Income Thresholds by Household Size**

Household Size	Low-Income Threshold
1	Under \$25,000
2	Under \$35,000
3-5	Under \$50,000
6-7	Under \$75,000
8-10	Under \$100,000

### *American Community Survey*

While County Connection’s onboard passenger survey provides a representative sample of adult riders, these types of surveys generally underrepresent youth riders, as they are less likely to complete the survey and/or be able to provide accurate information such as household income. Due to this absence of reliable demographic data on County Connection’s youth riders, data from the American Community Survey (ACS) was used for analyzing the proposed youth fare discount. More specifically, the analysis

uses data from the 2018 ACS 5-year estimates for all Census tracts within County Connection’s service area. Staff had also evaluated using school data from the California Department of Education but concluded that the available data would be incomplete, as it would exclude private schools.

## 4.2 Impact Assessment

Since different data sources had to be used, the analyses of the Clipper START and youth fare discounts were conducted separately.

### Clipper START

Based on the onboard survey data, 56.1% of all County Connection riders identify as minority, and 62.4% are considered low-income. Of the riders who would qualify for the Clipper START program, 61.3% identify as minority, and all are low-income.

There is no disparate impact on minority riders from the implementation of the Clipper START discount. Of the low-income riders who would qualify for the program, 61.3% are minority, which is higher than the system as a whole (56.1%) by a margin of +5.2%. Thus, minority riders would be more likely to receive the discount.

There is also no disproportionate burden on low-income riders from the implementation of the Clipper START discount. All users (100%) of the Clipper START discount would be low-income given that this is the eligibility criteria for the program. When compared to the system as a whole, this is a differential of +37.6%.

**Table 3: Clipper START Impact Analysis Results**

	% Minority	% Low-Income
<b>Eligible for Clipper START</b>	<b>61.3%</b>	<b>100.0%</b>
Systemwide	56.1%	62.4%
<b>Difference from Systemwide</b>	<b>+5.2%</b>	<b>+37.6%</b>
<i>Results</i>	<i>No Disparate Impact</i>	<i>No Disproportionate Burden</i>

### Youth Fare

Based on ACS data, 40.9% of all residents within County Connection’s service area identify as minority, and 14.2% are considered low-income. Of all residents that would qualify for the youth fare discount, 51.7% are minority, and 13.7% are considered low-income.

There is no disparate impact on minority riders from the implementation of the youth fare discount. The percentage of youth that are minority in County Connection’s service area is higher than the overall population by a margin of +10.8%.

There is also no disproportionate burden on low-income riders from the implementation of the youth fare discount. The percentage of youth that are low-income is lower than the service area as a whole by a margin of -0.5%, which means that low-income residents would be slightly less likely to receive the discount. However, the differential of 0.5% is well within the 20% threshold set forth in the disproportionate burden policy. Additionally, the youth discount furthers the purpose of increasing transit accessibility for youth. County Connection is engaging in other fare based programs that will benefit low-income riders, including the Clipper START program.

**Table 4: Youth Fare Impact Analysis Results**

	<b>% Minority</b>	<b>% Low-Income</b>
<b>Eligible for Youth Fare</b>	<b>51.7%</b>	<b>13.7%</b>
Service Area	40.9%	14.2%
<b>Difference from Service Area</b>	<b>+10.8%</b>	<b>-0.5%</b>
<i>Results</i>	<i>No Disparate Impact</i>	<i>No Disproportionate Burden</i>

## 5 PUBLIC OUTREACH

In September 2020, staff began conducting outreach to solicit feedback from the public on the proposed Clipper START and youth fare discount program. Due to the ongoing COVID-19 pandemic, in-person outreach was not feasible. Instead, staff conducted all public meetings via teleconference, which allows the public to participate using a computer or by phone. This included two public meetings on October 14, 2020 at 9:00 am and 5:00 pm, and a public hearing on November 19, 2020. The public was able to comment on the proposed program during these three meetings, as well as via mail, email, and online through County Connection’s website.

Notices for the public meetings and public hearing were placed on all buses, as well as in the East Bay Times. Information about the proposed program was available on County Connection’s website and announced through several social media posts on Twitter, Facebook, Instagram, and NextDoor. Staff also reached out to various community partners who helped to further disseminate information to their constituents.

## **5.1 Public Comment**

A total of six (6) comments were received relative to the proposed fare discount programs. Four (4) were in favor of the proposed discounts, and two (2) comments were partially in favor but opposed the discounts only being available on Clipper.

Two online polls were also conducted via Twitter and NextDoor to solicit additional feedback from the public. Together, the polls received 230 responses, with 184 in favor, 25 in opposition, and 21 that were unsure.



# Title VI Service Equity Analysis

## 2021 Service Plan

CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
March 2021

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# 1 INTRODUCTION

As a federal grant recipient, the Central Contra Costa Transit Authority (County Connection) is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination by recipients of federal financial assistance. The FTA further requires that recipients of FTA financial assistance conduct an analysis on all major service changes to assess the impacts of those changes on low-income and minority populations.

In March 2020, a Shelter-in-Place Order was issued in Contra Costa County in response to the COVID-19 pandemic, which limited activity, travel, and business functions to only the most essential needs. As a result, ridership dropped around 75% and has continued to stay at that reduced level. Starting in April 2020, service had to be adjusted to meet essential needs. Subsequently in August, staff made temporary service changes in response to reduced operator availability and shifts in riders' travel patterns to only essential trips. Additional service adjustments were subsequently made in October.

The pandemic has also had significant negative impacts on several revenue sources, ranging from local and state sales tax to farebox recovery. In anticipation of reduced revenues, staff began evaluating potential service cuts in order to remain financially viable. Due to uncertainty regarding the future economic impacts of COVID-19, staff developed three service cut scenarios with estimated cost savings of \$3, \$5, and \$7 million annually (Scenarios 1, 2, and 3, respectively). In developing the proposals, staff sought to prioritize essential services and workers, as these riders have continued to rely on transit through the pandemic.

Since all three scenarios would be considered a major reduction in service, staff conducted public outreach to gather input on the proposals. Staff held an informational webinar in December 2020, followed by a series of virtual public hearings in January 2021. The public was also able to provide comments via phone, mail, email, and online through County Connection's website.

Given current financial projections, staff is proposing the implementation of Scenario 1, which would include an approximately 13% reduction in service hours and an estimated cost savings of \$3 million annually compared to pre-pandemic service levels. The proposed service plan would largely be a continuation of the service levels that are currently being operated on a temporary basis but with some revisions based on public feedback. Should the Board approve the proposed service plan, the earliest that staff could implement any of the changes would be Summer 2021. However, depending on financial needs and service requirements as the pandemic evolves, implementation could be delayed until Fall or Winter 2021.

As the proposed service plan constitutes a major service change when compared to pre-pandemic service levels, approval and implementation of the service changes requires an equity analysis under the FTA's Title VI regulations. The following equity analysis indicates that there is no disparate impact based on race, and no disproportionate burden on low-income riders from the proposed service plan.

## 2 TITLE VI POLICIES

In October 2012, the FTA released Circular 4702.1B (Circular), which provides guidelines for compliance with Title VI. Under the Circular, transit operators are required to study proposed fare changes and "major service changes" before the changes are adopted to ensure that such changes do not have a discriminatory effect based on race, color, national origin or low-income status of affected populations. As a first step, public transit providers must adopt their own "Major Service Change," "Disparate Impact," and "Disproportionate Burden," policies. County Connection's Board of Directors adopted these policies in June 2013. The adopted Major Service Change, Disparate Impact and Disproportionate Burden policies are described below. Resolution No. 2013-019 demonstrates the Board's consideration, awareness, and approval of these policies is included in Appendix A.

### 2.1 Major Service Change Policy

The Major Service Change Policy establishes a threshold for when a proposed service increase or decrease is "major," and thus must be subject to a Title VI Equity Analysis.

County Connection previously defined major service decreases in its adopted "Public Hearing Policy." The Major Service Change Policy applies this threshold to both increases and decreases and provides for changes to be measured not just individually, but on a cumulative basis over a 12-month period.

County Connection defines a major service change as:

- An increase or decrease of 25 percent or more to the number of transit route miles of a bus route.
- An increase or decrease of 25 percent or more to the number of daily transit revenue miles of a bus route for the day of the week for which the change is made.
- A change of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.
- Changes shall be counted cumulatively, with service changes being "major" if the 25 percent change occurs at one time or in stages, with changes totaling 25 percent over a 12-month period.



The following service changes are exempt from this 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), as long as the service will be/has been operated for no more than twelve months.
- County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.

## 2.2 Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on minority populations relative to non-minority populations on the basis of race, ethnicity or national origin.

The threshold is the difference between the burdens borne by, or benefits experienced by, minority populations compared to non-minority populations. Exceeding the threshold means either that a fare or major service change negatively impacts minority populations more than non-minority populations, or that the change benefits non-minority populations more than minority populations. A change with disparate impacts that exceed the threshold can only be adopted (a) if there is substantial legitimate justification for the change, and (b) if no other alternatives exist that would serve the same legitimate objectives with less disproportionate effects on the basis of race, color or national origin.

County Connection establishes that a fare change, major service change or other policy has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives with less disproportionate effects on the basis of race, color or national origin.

## 2.3 Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or major service changes have a disproportionately adverse effect on low-income populations relative to non-low-income populations.

The threshold is the difference between the burdens borne by, and benefits experienced by, low-income populations compared to non-low-income populations. Exceeding the threshold means either that a fare or service change negatively impacts low-income populations more than non-low-income populations, or that the change benefits non-low-income populations more than low-income populations. If the threshold is exceeded, County Connection must avoid, minimize or mitigate impacts where practicable.

County Connection establishes that a fare change, major service change or other policy has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations, unless avoiding, minimizing, or mitigating the disproportionate effects is impracticable.

## 2.4 Public Outreach

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

*Comments: None*

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

*Comments: None*

### 3 PROPOSAL DESCRIPTION

The proposed service plan would reduce service hours by approximately 13% compared to pre-COVID service levels. This reduction is consistent with current service levels. The development of the plan was guided by four main objectives:

- Retaining access to essential jobs and services and to transit-dependent areas
- Providing adequate capacity along high ridership routes and corridors
- Retaining weekend service and 600-series school service
- Improving coordination with BART

In the proposed plan, service frequency would be reduced on Routes 4, 5, 6, 7, 27, 35, 92X, 95X, and 96X (see Table 1). These routes have sustained the greatest ridership losses due to the pandemic, as demand has shifted away from traditional 9-to-5 commuters, and more towards essential workers and those making essential trips. These essential trips also tend to be more spread out throughout the day as opposed to concentrated around traditional morning and evening peak times, which are typically 6 AM – 9 AM and 4 PM – 7 PM. Thus, the proposed reductions on most routes target peak-period service in order to preserve a base level of service all day.

**Table 1: Proposed Frequency Reductions**

Route	Pre-COVID (peak/off-peak)	Scenario 1 (peak/off-peak)
4 (weekday only)	12 min	20 min
5	20/45 min	40 min
6 (weekday only)	20/60 min	30/60 min
7	15/- min	20/- min
27	40/60 min	3 trips
35	15-20/30-60 min	30/60 min
92X	8 trips	4 trips
95X	20/- min	30/- min
96X	20/60 min	30/- min

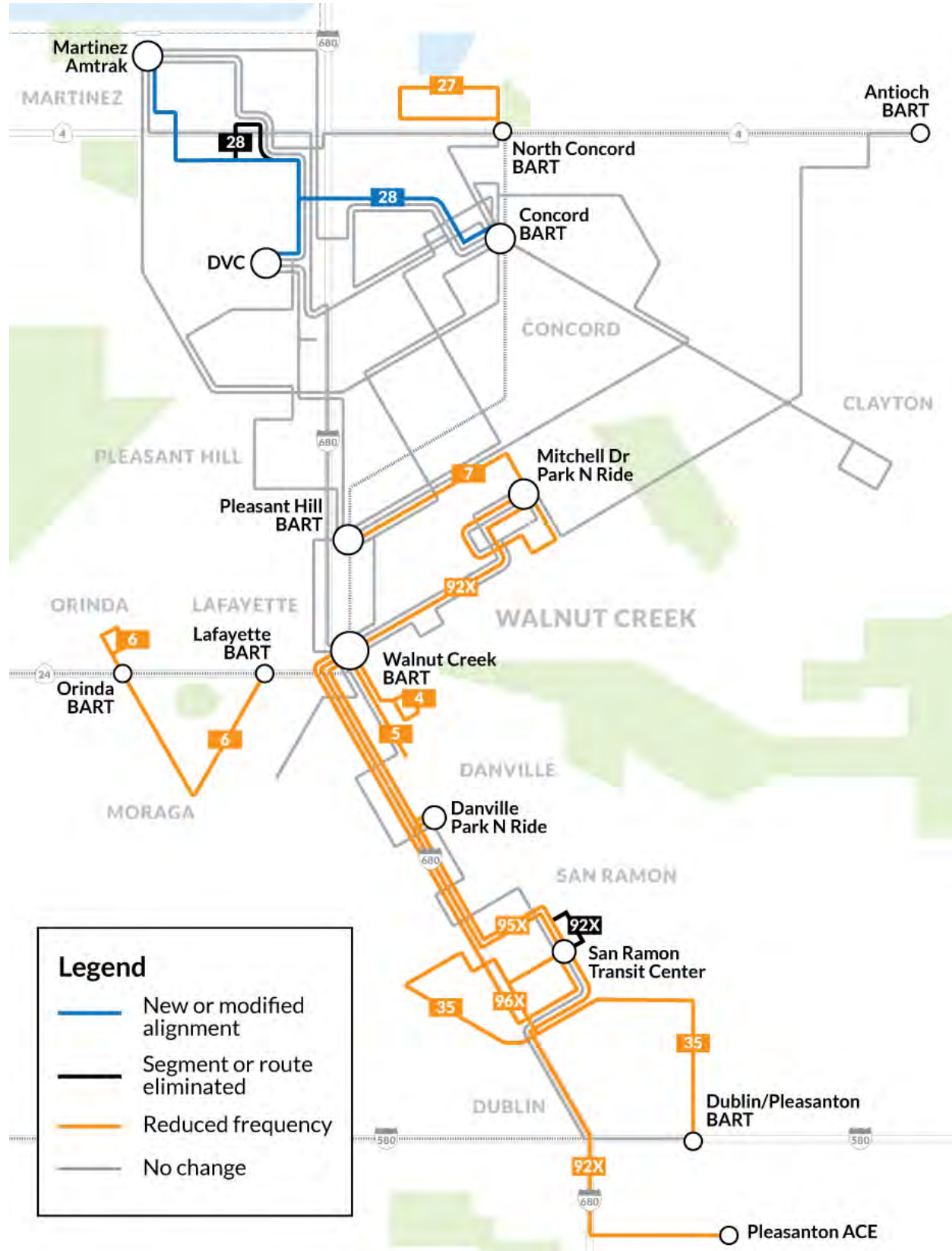
The proposed plan also includes two alignment changes. The first proposed change is to extend Route 28 to Concord BART and realign the route from Arnold Dr and Center Ave to Muir Rd. Route 28 serves several essential businesses and facilities, including the VA Clinic, Kaiser, and Contra Costa Regional Medical Center. The extension of the route to BART provides additional connection opportunities to these essential services, as well as more direct service to Diablo Valley College, while the realignment speeds up the route.

The second proposed alignment change is to simplify the routing of Route 92X through Bishop Ranch by removing stops at BR 15 and Bishop/Sunset. This change is not directly linked to the objectives defined for the overall service change, since this would have been implemented regardless to speed up the route. These stops have historically had low ridership, and alternate stops are available within ½-mile.

All of these proposed changes have been in place on a temporary basis since October 2020. Figure 1 shows the routes that would be impacted by the proposed service plan.

The original proposal also included the elimination of the Orinda Community Center loop on Route 6. However, based on public feedback, staff revised the proposal to retain service along this segment of the route, as it provides connections to important services including the Orinda Library and Community Center.

Figure 1: Map of Proposed Service Changes



## 4 EQUITY ANALYSIS

The proposed service plan includes significant schedule and/or alignment changes to several routes, resulting in both beneficial and adverse impacts. Most of the route changes independently constitute a major service change. However, due to the interconnected nature of the changes in the plan, this analysis evaluates the entire implementation of the service plan as a single major service change.

### 4.1 Data and Methodology

This analysis evaluates the impacts of the service plan by comparing the proportion of minority and low-income riders who would be affected by the change to the system as a whole. The proposed plan reduces service by shortening routes and increasing headways, which are adverse effects. This analysis measures the distribution of the adverse effects of the service plan. The most appropriate measure of the adverse effect is the reduction in boardings that will result from the service plan.

#### Definitions

**Minority** – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

**Low-Income** – FTA defines a low-income person as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. However, FTA encourages the use of any locally developed threshold provided that the threshold is at least as inclusive as the HHS poverty guidelines. Due to the area's higher cost of living, County Connection defines low-income as 150% of the federal poverty level.

#### Data Sources

Since the proposed changes only impact existing routes, staff used ridership data as opposed to Census data for the analysis. This provides a more accurate assessment of the actual riders who would be affected in recognition that the surrounding geographic area of a route is not always reflective of the ridership demographics of that route.

#### *Onboard Passenger Survey*

An onboard passenger survey was conducted on County Connection buses in October 2019 and a total of 1,188 responses were collected. The survey was conducted on both weekdays and weekends using handheld tablet personal computers on which the online survey was administered. A sampling plan was developed to ensure that the distribution of completed surveys mirrored the actual distribution of passengers using the system. The plan included completion goals that were set by route and time period based on ridership.

The survey data provides demographic information on County Connection’s riders, including race and income. Respondents who declined to answer questions about income or ethnicity are excluded from the analysis. In order to protect privacy, survey respondents were asked to report their income bracket as opposed to their specific income. Because of this, the analysis uses the midpoint of the selected income bracket to compare against the federal poverty level. Table 2 below shows how low-income status—defined in this analysis as 150% of the 2019 federal poverty guidelines—is determined based on household size and income bracket. Using these thresholds, each individual survey response was categorized as either low-income or non-low-income based on responses to the questions about household size and income.

**Table 2: Low-Income Thresholds by Household Size**

Household Size	Low-Income Threshold
1-2	Under \$25,000
3-4	Under \$35,000
5-7	Under \$50,000
8-10	Under \$75,000

### *Ridership Data*

The analysis uses average daily boardings for each route to estimate the number of riders that would be impacted by the changes. Ridership data was used from February 2020, which most closely reflects service and ridership levels prior to COVID-19. While the COVID-19 pandemic has substantially altered ridership patterns, it has also made collection of data on current ridership demographics difficult. Additionally, this service change is analyzed as a permanent change. This analysis assumes that pre-COVID ridership demographics are the best available estimate for post-COVID ridership demographics.

### Methodology

The following methodology was used to analyze the impact of the proposed changes:

1. Using onboard passenger survey data, quantify the percentage of minority and low-income riders for each affected route and systemwide.
2. Estimate the total number of passengers who would be impacted by the proposed changes by route. This is calculated by multiplying the proposed change in daily revenue miles by the average number of passengers per revenue mile on each individual route. Evaluating daily

revenue miles captures both the effects of a reduction in the length of a route and the increase in headways.

3. Estimate the number of minority and low-income passengers who would be impacted by the proposed changes by route. This is calculated by multiplying the number of all impacted passengers by the percentages of minority and low-income passengers on each individual route, and accounts for route usage.
4. Calculate the percentages of minority and low-income passengers who would be impacted by the proposed changes across all adjusted routes. These are calculated by dividing the total number of impacted minority and low-income passengers for all affected routes by the total number of impacted passengers.
5. Compare the percentages of minority and low-income passengers who would be impacted to the percentages of those riders systemwide to see if the difference exceeds the disparate impact threshold or disproportionate burden threshold of 20%.



## 4.2 Impact Assessment

Table 3 below shows the base route metrics used for the impact assessment according to the methodology outlined above. This includes revenue miles based on service prior to COVID-19 (schedules effective February 23, 2020), estimated revenue miles based on the proposed service plan, average daily passengers prior to COVID-19 (February 2020), and percentages of minority and low-income riders from the onboard passenger survey.

**Table 3: Calculation Metrics by Route**

Route	Current Daily Revenue Miles	Proposed Daily Revenue Miles	Average Daily Passengers	% Minority	% Low-Income
4	197.3	127.5	741.6	57.0%	58.0%
5	138.3	99.3	513.4	55.0%	33.3%
6	614.4	496.8	582.4	60.0%	47.8%
7	232.7	186.1	523.8	62.9%	33.3%
27	50.7	19.0	72.3	65.2%	35.0%
28	174.0	275.8	131.3	53.8%	60.9%
35	715.0	538.6	724.4	66.0%	17.9%
92X	259.8	173.2	172.6	22.2%	0.0%
95X	462.3	322.6	295.6	57.9%	17.6%
96X	625.8	368.6	373.2	53.2%	26.8%

Table 4 shows the estimated number of passengers who would be impacted by the proposed changes. A negative number indicates an adverse effect due to a reduction in service, whereas a positive number indicates a benefit due to an increase in service.

Table 4: Impacted Boardings by Route

Route	Impacted Boardings	Impacted Minority Boardings	Impacted Low-Income Boardings
4	-262.5	-149.6	-152.2
5	-144.9	-79.7	-48.3
6	-111.4	-66.9	-53.3
7	-104.7	-65.8	-34.9
27	-45.2	-29.5	-15.8
28	76.8	41.4	46.8
35	-178.7	-117.9	-32.1
92X	-57.5	-12.8	0.0
95X	-89.4	-51.7	-15.8
96X	-153.4	-81.6	-41.2
<b>All Adjusted Routes</b>	<b>-1,071.0</b>	<b>-614.1</b>	<b>-346.8</b>

Finally, Table 5 summarizes the results of the analysis. Based on the onboard survey data, 56.1% of all County Connection riders identify as minority, and 44.4% are considered low-income. Based on the estimates of impacted riders, 57.3% are minority, and 32.4% are low-income.

Table 5: Impact Analysis Results

	% Minority	% Low-Income
<b>Percent Impacted</b>	<b>57.3%</b>	<b>32.4%</b>
Systemwide	56.1%	44.4%
<b>Difference from Systemwide</b>	<b>+1.3%</b>	<b>-12.0%</b>
<i>Results</i>	<i>No Disparate Impact</i>	<i>No Disproportionate Burden</i>

There is no disparate impact on minority riders from the proposed service changes. While minority riders would be impacted slightly more than their proportion of ridership systemwide, the differential of +1.3% is well below the 20% threshold set forth in the disparate impact policy.

There is also no disproportionate burden on low-income riders from the proposed service plan. Based on the analysis, low-income riders would be impacted less than their proportion of ridership on the system as a whole by a margin of 12.0%.

Even if there were a disparate impact, there is substantial legitimate justification for implementation of the service plan. County Connection is faced with a severe loss of revenue due to the COVID-19 pandemic, and reducing service is necessary to compensate. Additionally, the proposed plan adjusts County Connection's service to account for changes in system usage due to the increase in riders working from home and altering their commute patterns.

However, there is still a large degree of uncertainty as it relates to COVID-19 and its potential long-term impacts on the economy and ridership demand. As schools, businesses, recreational facilities, and other non-essential services return to normal operations, staff will need to respond quickly to augment service based on the community's needs and the agency's financial capacity. Any restoration of service will initially be implemented as a temporary adjustment, and once there is more certainty, staff will conduct a similar public outreach process and Title VI equity analysis before making any additional changes permanent.

## 5 PUBLIC OUTREACH

In December 2020, staff began conducting outreach to solicit feedback from the public on the three proposed service scenarios. Due to the ongoing COVID-19 pandemic, in-person outreach was not feasible. Instead, staff conducted all public meetings via teleconference, which allows the public to participate using a computer or by phone.

Staff conducted an initial webinar on December 1, 2020 to provide the public with a high-level overview of the three service scenarios and gather some preliminary feedback. This was followed by a series of four virtual public hearings—two were held on January 5, 2021 and another two on January 8, 2021. Each public hearing focused on a different part of County Connection's service area (North, South, Core, and Lamorinda) and provided an opportunity for the public to provide formal comments on the proposals. The public was also able to provide comments via phone, mail, email, and online through the County Connection website.

Notices for the webinar and public hearings were placed on all buses, as well as in the East Bay Times. Information about the proposed service plan scenarios was available on County Connection's website and announced through several social media posts on Twitter, Facebook, Instagram, and NextDoor. Staff

also reached out to various community partners who helped to further disseminate information to their constituents.

## 5.1 Public Comment

No public comments were received during the public hearings. However, a total of twelve (12) written comments were received by email and online that were directly related to one or more of the proposed scenarios (see Appendix B). Four (4) comments were related specifically to Scenario 1, which is the service plan currently being proposed. These comments are addressed in more detail below.

Two (2) comments were submitted opposing the elimination of the Orinda Community Center loop on Route 6. Based on this feedback, staff revised the proposed plan to retain service along this segment of the route.

One (1) comment was submitted by a rider who was concerned about reduced frequency on Route 35, particularly on the Windemere loop, which is only served by a limited number of trips (nine in each direction). Staff has confirmed that there will be minimal impact to service on the Windemere loop, and the proposed service plan would only eliminate one trip in each direction.

Finally, one (1) comment was submitted expressing general support for Scenario 1 over the more extensive cuts in the other two scenarios.

## **APPENDIX A: RESOLUTION NO. 2013-019**

## **RESOLUTION NO. 2013-019**

### **Central Contra Costa Transit Authority**

#### **Board of Directors**

\*\*\*

#### **Adoption of Major Service Change, Disparate Impact, and Disproportionate Burden policies required for compliance with Title VI of the Civil Rights Act of 1964**

**WHEREAS**, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 et seq., for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions; and

**WHEREAS**, Title VI of the Civil Rights Act of 1964 requires recipients of Federal grants and other federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to, race, color or national origin; and

**WHEREAS**, the Federal Transit Administration (FTA) issued Circular FTA C 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

**WHEREAS**, as set forth in the above-referenced Circular, the Board of Directors is required to adopt policies to guide the equitable distribution of County Connection services; and

**WHEREAS**, the County Connection is also required to adopt policies to define when a service change is sufficiently broad or large to necessitate a review of its potential impacts on minority and low-income populations, and to define when a fare change or major service change will have a disparate impact on minority populations or impose a disproportionate burden on low-income populations, all of which policies and definitions are required to be subject to public input; and

**WHEREAS**, over the past three months, staff has presented draft policies to the Marketing, Planning, and Legislative Committee and the public through public meetings, and accepted public comment on the policies; and

**WHEREAS**, the General Manager recommends the Board approve the attached definition of "Major Service Change," and Disparate Impact and Disproportionate Burden policies, which comply with FTA requirements and which will guide future decisions regarding and monitoring of County Connection programs and services to ensure they are provided equitably, without discrimination based on race, color or national origin.

**NOW, THEREFORE, BE IT RESOLVED** the Board of Directors of the Central Contra Costa Transit Authority hereby approves the attached definition of "Major Service Change," and Disparate Impact and Disproportionate Burden policies.

Regularly passed and adopted this 20th day of June, 2013 by the following vote:

AYES: Directors Andersen, Haskew, Horn, Hoffmeister, Manning, Schroder and Worth

NOES: Directors Dessayer and Weir

ABSTENTIONS: None

ABSENT: Directors Hudson and Storer



Erling Horn, Chair, Board of Directors

ATTEST:



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Lathina Hill, Clerk to the Board

## APPENDIX B: PUBLIC COMMENTS

*All comments are presented as submitted; no revisions (such as to correct misspellings) were made.*

1	<p>I take 2 buses in the morning (98X and 28). I commute from downtown Walnut Creek to Center Ave. in Martinez. I walk over a mile to the WC BART to catch the 98X. I start work at 8am. I have to take the 6:30am 98X bus and then wait 20 minutes for the 28 bus at Pacheco/Center that arrives at 7:03am. There's a 6:50am 98X bus but it doesn't connect with the 28 bus. If the 28 could be adjusted back to arriving at Pacheco/Center at 7:06am, that would be ideal.</p> <p>My commute home has turned into a 2 hour commute. I have to rush to catch the 28 bus after I get off work at 5pm. Once I get to Pacheco/Center, I have to wait 45 minutes to catch the 98X. So it's basically a hurry up and then wait... When I get to WC Bart, I catch the 4. So that's another 10-15 minute wait. I end up walking the mile home from the Bart station.</p> <p>If there are further reductions in service it will become more impossible to get to and from work. I've been relying more on Uber, which is not sustainable for me. Since I currently only commute into work 2x week now due to COVID, my input probably won't make any difference in considering service changes.</p>
2	<p>For Route 6, we are concerned about the proposed alignment change to eliminate the Orinda Community Center loop. That loop serves 2 senior housing complexes located near the Orinda Way/Irwin Way intersection. It also provide access to the Orinda Library and Community Center. We request County Connection not eliminate the Orinda Community Center loop.</p>
3	<p>If you must scenario 1 would be the best of all scenarios. I know it doesn't save as much as the others but it would have the least negative impact on the ridership</p>
4	<p>There are still essential workers that uses the Express buses going to San Ramon. Eliminating both the 95 and 96 buses is going to leave us stranded. Please consider keeping at least the 95x</p> <p>Where it will make the rounds essential workers work-Cosco area, Kaiser, Anabel,Bishop Ranch 8 which easier to walk to Bishop Ranch 6 for At&amp;t workers</p> <p>We will greatly appreciate if you at least consider.</p> <p><i>[In Response to Another Comment]</i></p> <p>For the essential workers who still comute from walnutcreek to San Ramon Bishop Ranch when you say the Rapid transit is faster is it the 21 that goes through town and very slow and like Lisa said it takes about 50 minutes and for for those of us who have to be at work 8AM and walk from the transit center to Anable Bishop Ranch 6 and 8 in the rain is going to be very difficult. Or are there</p> <p>going to be other buses .Or just have to one Express bus that runs 2times in the morning peak hours and one in the afternoon between 4and 6pm</p>



5	<p><i>[In Response to Another Comment]</i></p> <p>I agree with Yayush, please do not eliminate all the express buses to San Ramon, the only other option is the 50mn 21 route and all those minutes add up during the week. Thank you</p>
6	I was wondering if going bring 96 at 1:30pm from San Roman transit center to. Walt creek Bart
7	<p>I would like to see the Orinda Community Center loop on route 6 maintained. It appears that is only retained in scenario 2 and 3.</p> <p>It would be desired to maintain current service levels on route 6 as depicted in scenario 1, but if that is not possible then the Orinda loop would be a priority request and default then to scenario 2 or 3.</p>
8	<p>I have relied on County Connection bus service as my primary mode of local transportation since I moved to Central Contra Costa County in 2005. I currently live in Martinez on Pacheco Blvd. between Ace Truckbox Center and Morello Ave. I work at Muir Parkway Offices on Arnold Drive less than two miles from my home. The relatively short commute distance is necessary for me because I do not have a car and I deal with health conditions that make walking long distances difficult. The proposed reduction in service frequency for Route 99X under Scenarios Two and Three would affect me directly. My current work schedule is 8:30 AM to 5:00 PM. If the Route 99X service reduction is to take effect, I would respectfully request that the schedule reflect my need to take the morning run heading towards North Concord BART and arrive at Muir Parkway Offices by approximately 8:20. Likewise, I would greatly appreciate it if service heading towards Martinez Amtrak would be available for me to catch the bus at Morello and Arnold at approximately 5:15. Additionally, I periodically take Route 28 to Kaiser Permanente Martinez Medical Offices on Muir Road. The next bus stop along that route in the Concord BART direction is Muir and Glacier, which is a considerable stretch. I am requesting that a Route 28 bus stop be installed at Muir Road and Morello Ave. so that I could potentially travel between medical appointments at Kaiser and my workplace. I concede that your agency cannot be expected to specifically accommodate the needs of a single individual rider in your service planning. Even so, I figure that it is worth a shot to express my needs, and I am grateful for the opportunity to do so, as well for the service that everyone at your agency has provided me for the last 16 years. Thank you very much for your time and consideration.</p>
9	<p>This letter is in regards to the cancellation of services to Bishop Ranch. I myself commute from Cameron Park ,Ca to Toyota which is 111 miles from my home. Transit is essential as I drop my car in Dixon, take Blue Line to Walnut Creek and then catch Bishop Ranch 95X. Being an essential worker has allowed myself and many colleagues to continue working. Taking the 95X that goes to Bishop Ranch 8 is a huge advantage to those of us that work at Toyota and cost saving as well. Please consider keeping it at least peak hours in the morning and in the afternoon between 4:00pm – 6:30pm. At least 2 in the morning and 2 in the afternoon. Only stopping at the Transit Center with the 96X and having to be at work at 8:00am and walking in bad weather would make it a very unpleasant daily occurrence along with compromising our jobs at 8:00am in the morning. Please consider.</p>

10	<p>Please keep the time of the 1st 98x bus and possibly the 2nd out of Martinez Amtrak. People transferring at Walnut Creek to the Bart train and to other buses need to ride the 1st 98x bus because many are commuting to cities to the south and the west and start work at 8:00 or before.</p> <p>In addition, people who commute by riding the 1st Capitol Corridor Amtrak out of Sacramento, transfer to the 1st 98x at the Martinez Amtrak station as a part of their daily commute to work in a variety of locations In the Bay Area.</p> <p>Please also keep the run of the last 98x bus out Walnut Creek Bart to Martinez Amtrak, for those who are returning from a commute that takes them some time to reach Walnut Creek at the end of the day.</p> <p>When the 1st run of line 16 out of Martinez Amtrak was eliminated, it left only the 98x operating at an early enough time out of Martinez.</p> <p>Bart trains are now not operating as frequently as they did precovid. So it is important for those riding the 98x to get to Walnut Creek as early as they can.</p>
11	<p>Firstly, thank you all for your service to our community and continuing to keep public transportation available during this challenging time.</p> <p>I am perhaps 10% of your current ridership on the 95x. I don't drive and commute to Berkeley (via WC BART) on the 95x every day. To be honest, most of the time I am the only person on the bus, so I totally understand if you need to cut it to cover (projected) budget deficits. It is unfortunate that ridership is unlikely to increase without the Covid situation comfortably behind us.</p> <p>Just in case the 95x gets axed, I beg that the 21's schedule be adjusted to better match the BART schedule during commuting hours. As far as I'm concerned the morning is okay, but in the evening if I catch a BART at MacArthur at 5:20-something, I'll arrive at WC BART at 5:42, then have to wait nearly 30 min for the next bus in the Danville/San Ramon direction. Thus, if the schedule could be pushed back by 5 minutes (so 5:45 departure from WC), it would be much appreciated. In case the 95x isn't cut entirely, it would also be nice if the 95x WC departures could be staggered with the 21. Right now they both leave at the same time which can be frustrating when you've missed them both by 2 minutes.</p> <p>I really am thankful for the CCCTA and hope your ridership increases in 2021!</p>
12	<p>I'm a regular rider of the bus 35 via Windermere route. Considering there are only a few schedules looping through this area, it'd be greatly appreciated if you do not cut any services in the upcoming planning.</p> <p>Thank you so much for your service to take care of people like me who depends on public transportation.</p>