

INTER OFFICE MEMO

To: Board of Directors **Date:** January 8, 2019

From: Bill Churchill, Asst. General Manager – Administration (C). Review (Cich)

Erick Cheung, Chief Financial Officer

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

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.

Propo	se	d Fare	e N	/lodif	ication	
Fare Type	ı	Existing Cost	Pi	roposed Cost	Details	
		Ca	ısh			
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	
Paper Passes (to be eliminated)						
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 25th to July 25th 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

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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:

Propo	ose	d Fare	e N	Nodif	ication
Fare Type	E	xisting Cost	Pi	roposed Cost	Details
	201	Ca	ısh		
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
P	aper l	Passes (to	o be	eliminat	ted)
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)

Clipp	er	- No ch	ang	es prop	oosed
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.

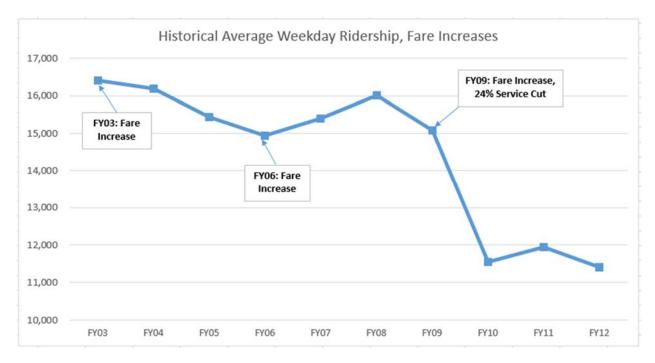
Public Outreach:

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.

Proposal: Discontinue Paper	Pro	oducts, \$2.5	0	Adult Cas	sh I	Fare
Existing Revenue by Fare Typ	oe ((FY18)	Es	timated R	eve	enue with
				Ridership) In	npacts
Fare Media, (Proposed Changes)	To	otal Existing				
		Revenue		5% Drop	_ 1	L0% 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
Total Annual Revenue	\$	3,304,203	\$	4,013,020	\$	3,801,808
Total Additional Revenue			\$	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).
- o 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 1st – June 1st, 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.

<u>Dataset</u>

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.

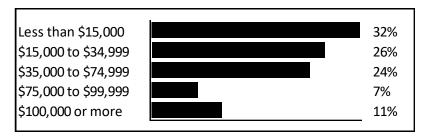
Data was first sorted to only compare fare categories that were actually paid. Free bus routes (like Routes 4, 5 and 7) were not included in the analysis due to the fact that those fares did not have any proposed changes.

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)

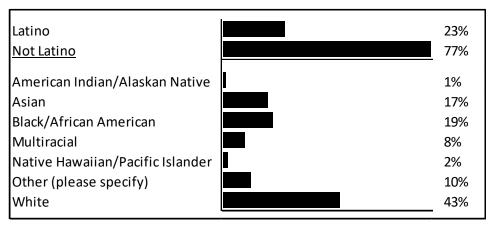
The following graphs form a profile of our ridership that was used for the equity analysis.

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

Househo	old Income	by Ethni	city and R	ace	
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

Prop	ose	d Fare	e 1	Nodif	ication	
Fare Type	E	xisting Cost	Р	roposed Cost	Details	
			sh	COST		
Adults and Youth over 6 years old Local	\$	2.00	\$	2.50	Regular routes	
Addits and fouth over 6 years old Local		2.00	٦	2.50	Express routes (90 series routes) (Express fare to	
Adults and Youth over 6 years old Express	\$	2.25	\$	2.50	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	
Paper Passes (to be eliminated)						
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 proposed changes due	to	require	d co	ordina	tion with East Bay Small Operators)
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

	Fare Changes Borne Impact/Burden	System-wide Average Impact/Burden	Delta
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 %	Low-Income Total	Disproportionate Minority Burden %	Minority %		Minority Disproportionate Total Impact
12-Ride Local/Express Punch card	226,520	8.5%	1.2%	9,139	-7%	1.1%	8,853	-7%
20-Ride Senior/Medicare Punch card	46,748	1.8%	0.5%	4,176	-1%	0.3%	2,149	-1%
Cash ¹	858,782	32.2%	38.4%	294,510	6%	36.0%	282,312	4%
Clipper Card ²	801,706	30.1%	39.2%	300,351	9%	44.6%	350,171	15%
Commuter Card	20,050	0.8%	0.1%	520	-1%	0.1%	830	-1%
Monthly Pass ³	91,047	3.4%	0.6%	4,461	-3%	0.6%	4,605	-3%
Transfer ⁴	371,467	13.9%	3.8%	28,904	-10%	2.7%	21,349	-11%
Midday Free ⁵	248,300	9.3%	16.2%	124,150	7%	14.6%	114,591	5%
Grand Total	2,664,622			766,211			784,858	

²Includes all Clipper products including local/express adult/senior single fares, day pass, monthly pass, Clipper transfers and Bishop Ranch Clipper cards ³Paper Monthly Passes only (local and express). Likely smaller due to Clipper Monthly passes being included in the Clipper fare demographic Includes Adult and Senior Local/Express Cash (not asked separately), BART transfers (paper discount slip where the difference is made up with cash)

⁵Midday Free demographic profile obtained from filtering free fare routes and Route 6 St Mary's free fare respondents

⁴County Connection Paper Transfers, Select East Bay transfers from outside agencies (Soltrans, Tri-Delta, WestCat, Wheels, FAST)

Figure 7

Count	Cost		Change		Usage by	Group	
Fare Type	Existing	Proposed	Absolute	Percentage	Low-	Minority	Overall
					Income		
Cash Fare ¹	\$2.00	\$2.50	\$0.50	25%	294,510	282,312	858,782
Paper	\$0	\$2.00	\$2.00		28,904	21,349	371,467
Transfer ²							
12 Ride	\$20/\$23	\$24/\$27	\$3	15%/13%	9,139	8,853	225,520
Pass ³							
20 Ride	\$15.00	\$20	\$5	33%	4,176	2,149	46,748
Pass							
Commuter	\$40.00	\$60	\$20	50%	520	830	20,050
Card							
Monthly	\$60.00/				4,461	4,605	91,047
Pass ⁴	\$70.00						
Midday	\$0	\$1.25	\$1.25		124,150	114,591	248,300
Fare ⁵		(\$1.00	(\$1.00				
		with	with				
		Clipper)	Clipper)				
Clipper ⁶	Various	No			300,351	282,312	858,782
		change					
					766,211	784,858	2,664,622

Percentage	Cost		Change		Usage by Gr	oup	
Fare Type	Existing	Proposed	Absolute	Percentage	Low-	Minority	Overall
					Income		
Cash Fare	\$2.00	\$2.50	\$0.50	25%	38.4%	36.0%	32.2%
Paper	\$0	\$2.00	\$2.00		3.8%	2.7%	13.9%
Transfer							
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	\$40.00	\$60	\$20	50%	0.1%	0.1%	0.8%
Card							
Monthly Pass	\$60.00/				0.6%	0.6%	3.4%
	\$70.00						

 $^{^{1}}$ The 2018 Onboard Survey did not collect separate statistics for adult and senior cash fares. These figures also include BART transfers.

² This figure includes transfers

³ The 2018 Onboard Survey did not collect separate statistics for express and regular 12-ride passes.

⁴ The 2018 Onboard Survey did not collect separate statistics for express and regular monthly passes.

⁵ 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.

⁶ Combines all Clipper fares, including single ride, passes, and transfers.

Senior/	\$0	\$1.25	\$1.25	 16.2%	14.6	9.3%
Disabled		(\$1.00	(\$1.00			
Midday Fare		with	with			
		Clipper)	Clipper)			
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%
Delta	0.0%
Minority	46.2%
Non-Minority	53.8%
Delta	-7.7%

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.

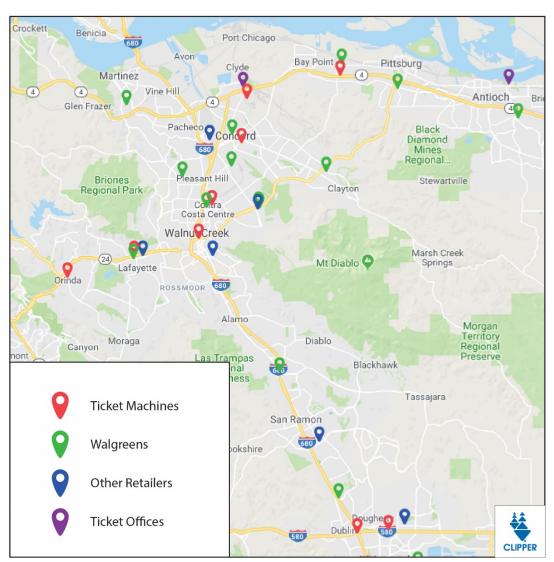
As a mitigation measure, certain populations will be able to continue riding County Connection buses for free under the same terms as the Midday Free program. These free fares will require ID and participation in particular programs, instead of being generally applicable. Currently, the only group participating 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 25th through July 25th 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

RESOLUTION NO. 2019-015

CENTRAL CONTRA COSTA TRANSIT AUTHORITY BOARD OF DIRECTORS

* * *

AUTHORIZING THE IMPLEMENTATION OF THE 2019 FARE STRUCTURE PROPOSAL

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 ("Service Area"); and

WHEREAS, CCCTA currently offers a series of fare products, including cash fares, a 12-Ride pass, 20-Ride Senior/RTC/Medicare pass, Commuter Card, monthly passes, Clipper Card, and free midday fare for seniors and disabled riders;

WHEREAS, payment by Clipper Card allows for significant practical synergies over cash fares, including reduced wait time on buses, allowing drivers to focus on driving rather than fare collection, reduced need to collect cash from fare boxes, and reduced fraud in fare payments;

WHEREAS, Bay Area transit agencies have been able to increase Clipper Card usage by increasing cash fares and eliminating transfers for cash fares while keeping fares on Clipper Card constant and allowing transfers for Clipper Card riders;

WHEREAS, CCCTA desires to bring its fare practices into conformity with the practices of its neighboring agencies and encourage usage of Clipper Cards;

WHEREAS, in April 2018, staff presented a draft 2019 Fare Structure Proposal to the Board of Directors ("Board") to modernize CCCTA fares by moving away from paper fare products in favor of promoting Clipper Card use;

WHEREAS, in September 2018, staff presented to the Board public comments received on the draft 2019 Fare Structure Proposal from community outreach staff conducted throughout the Service Area;

WHEREAS, the 2019 Fare Structure Proposal ("Proposal") would increase prices for cash fares, eliminate paper transfers for cash fares, eliminate paper passes, and eliminate the free midday fare for seniors and disabled riders, as further described in Attachment 1, attached hereto and incorporated by reference;

WHEREAS, the Proposal includes several efforts to mitigate the projected impacts of the fare increases, including extending the free midday fare for certain riders, and increased outreach about the availability of Clipper Card;

WHEREAS, Federal Transit Administration ("FTA") Circular C 4702.1B implementing Title VI of the Civil Rights Act of 1964 ("Title VI") requires CCCTA to conduct an equity analysis ("Title VI Analysis") on fare changes to assess whether the changes have disproportionate burdens on low-income populations or disparate adverse impacts on minority populations;

WHEREAS, the Title VI Analysis of the Proposal found that none of the proposed fare changes have a disparate impact on minority populations or a disproportionate burden on low-income populations;

WHEREAS, the Board has reviewed the Title VI Analysis and the public input received; and

WHEREAS, staff recommends that the Board approve the Proposal and the Title VI Analysis.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Central Contra Costa Transit Authority as follows:

- 1. The General Manager, or his designee, is hereby authorized to implement the Proposal, with the changes to take effect as of March 1, 2019.
- 2. The fare change analysis of the 2019 Fare Structure Proposal, as further described in Attachment 1, is hereby approved.
- 3. The General Manager, or his designee, is hereby authorized to take all necessary steps to submit documentation relating to the Title VI Analysis to the FTA.

Regularly passed and adopted this 17th day of January, 201	9 by the following vote:
AYES:	
NOES:	
ABSENT:	
ABSTAIN:	
	Sue Noack, Chair, Board of Directors
ATTEST:	
Lathina Hill, Clerk to the Board	