

To: Administration & Finance Committee

Date: 5/28/2025

From: Pranjal Dixit, Manager of Planning

Reviewed by: *Ref*

SUBJECT: Clipper Discounts Title VI Fare Equity Analysis

Background:

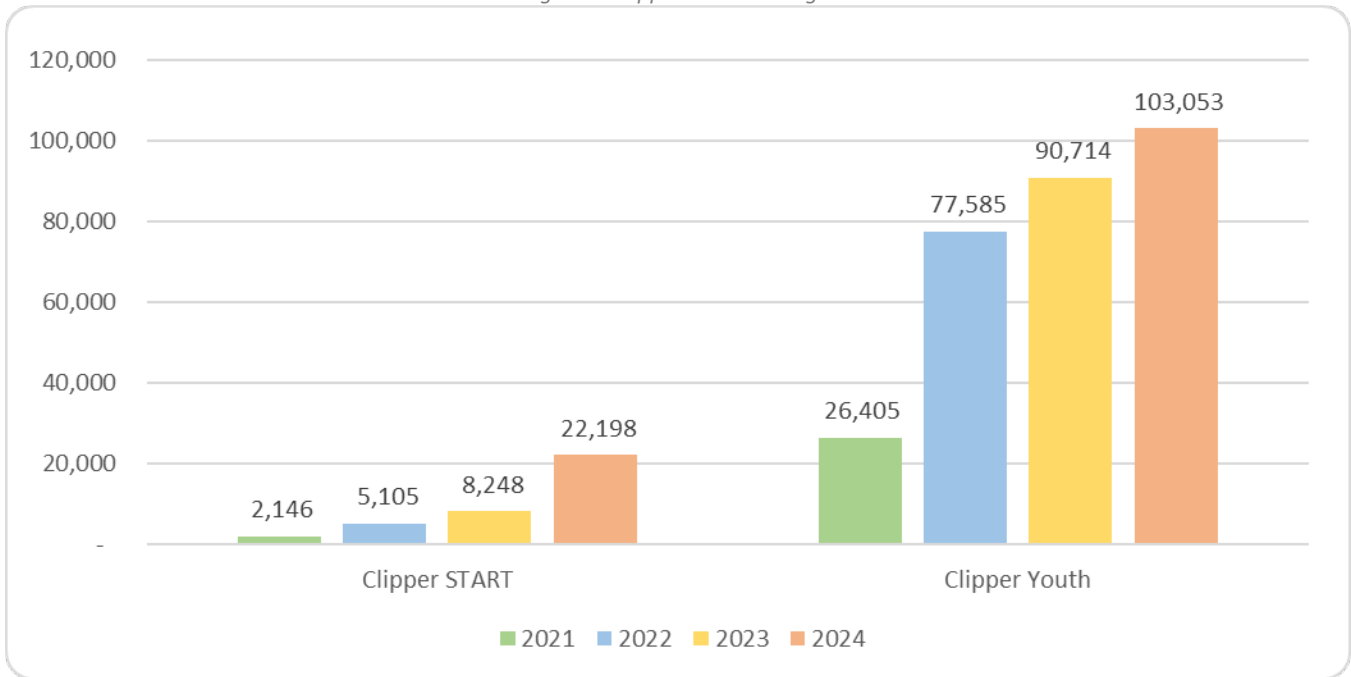
The Clipper START and Youth Clipper fare discounts on County Connection, initially launched as a pilot program in January 2021 with a 20% reduction off the single-ride Clipper fare. Clipper START, a regional initiative by the Metropolitan Transportation Commission (MTC), offers discounted fares to low-income adults (ages 19-64) with incomes at or below 200% of the federal poverty level through a specially encoded Clipper card. MTC provides funding to transit operators to partially offset the program's cost. Initially, transit operators offered varying discount levels (ranging from 20% to 50%) on Clipper START. Starting in January 2024 all operators participating in Clipper START offer a 50% discount. Recognizing that Clipper START is limited to adults, County Connection introduced a parallel 50% discount for youth riders (ages 6-18) using a Youth Clipper card, also starting in January 2024. Given the regional success and increased adoption of Clipper START, MTC has proposed making the program permanent after the pilot concludes on June 30, 2025, while continuing partial fare loss reimbursement to transit operators.

Ridership Trend:

In the 12 months since the regional 50% discount for Clipper START went into effect, County Connection routes have seen a significant surge in ridership. Clipper START usage increased by 169%, and the number of unique cards used grew by 161%, indicating a substantial influx of new users, as shown in Figure 1. The actual usage by Clipper START cardholders is likely even higher, as many County Connection routes are free. Meanwhile, Clipper Youth has also experienced steady growth, adding over 10,000 rides since its discount increased.

Given Clipper START's positive impact on low-income riders and continued MTC subsidies, staff recommends continuing the 50% discount for Clipper START. We also propose expanding this 50% discount to Clipper Youth to match Clipper START, which would further reduce transit costs and improve access to transit for youth.

Figure 1: Clipper Product Usage



Title VI Requirement:

As a federal grant recipient, 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 non-exempt fare changes to assess the impacts of those changes on low-income and minority populations. Since the proposal constitutes a fare change, its implementation requires an equity analysis under the FTA's Title VI regulations.

A fare reduction is deemed to be a benefit, and the required disparate impact analysis examines the allocation of benefits from the fare reduction among minority riders on the affected routes relative to the proportion of minority riders among the system ridership as a whole. Similarly, the required disproportionate burden analysis examines the allocation of benefits from the fare reduction among low-income riders on the affected routes relative to proportion of low-income riders among the system ridership as a whole.

Equity Analysis:

The impact analyses were conducted using 2023 onboard passenger survey data for the Clipper START fare changes and Census data for the Youth Clipper fare change. The use of Census data for the Youth Clipper analysis was due to the lack of reliable onboard survey data among youth riders, who are less likely to complete these types of surveys and/or provide accurate information such as household income.

The attached Title VI Fare Equity Analysis did not find any disparate impact based on race or any disproportionate burden to low-income populations from any of the proposed fare changes. For the Clipper START discount, the analysis found that minority and low-income riders would be more likely to receive the discount by a margin of 7.1% and 40.4%, respectively. For the Youth Clipper fare discount, minority and low-income riders would also be more likely to receive the discount by a margin of 11.6% and 0.5%, respectively.

Public Outreach:

In May 2025, staff began outreach to receive public comment on the proposed continuation of Clipper discounts. A public hearing has been scheduled for June 19, 2025, preceding the Board of Directors meeting. The public may also submit written comments via mail, email, and online through County Connection’s website. Written comments are due June 11th and will be included in the item presented to the Board. All comments received, including those at the public hearing will be summarized in the final Title VI report, which will be presented to the FTA.

Financial Implications:

Staff estimates continuation of 50% discount for both Clipper START and Youth Clipper will result in an annual net revenue loss of \$132,000 as shown in *Table 1*. This includes partial reimbursement by MTC to offset fare loss faced by transit agencies. MTC will continue annual upfront payment to transit operators based on anticipated fare revenue losses.

Table 1: Estimated Annual Fare Revenue Loss

Fare Change	Current
Clipper START	\$12,000
Youth Clipper	\$120,000
TOTAL	\$132,000

Recommendation:

Staff recommends that the A&F Committee forward the attached Title VI Fare Equity Analysis to the Board for review and approval. The analysis has been reviewed by legal counsel, and the public outreach section will be updated upon completion of the scheduled public hearing.

Action Requested:

Staff requests that the A&F Committee forward this item to the Board for approval.

Attachments:

Attachment 1: Title VI Fare Equity Analysis

County Connection

Title VI Fare Equity Analysis
2025 Clipper Fare Changes

CENTRAL CONTRA COSTA TRANSIT AUTHORITY
June 2025

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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 following changes to Clipper® fares:

- Continuation of 50% discount single-ride fare for Clipper START
- Continuation of 50% discount single-ride fare for Youth Clipper

The proposed changes will continue fare discounts for certain riders, which constitutes a fare change requiring an equity analysis under the FTA's Title VI regulations. The following equity analysis concludes that there is no disparate impact based on race, and no disproportionate burden on low-income riders, from continuation of either of the proposed fare programs.

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 take steps to 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 the above 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

Public 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

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

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

Public Comments: None

April 1st – June 1st, 2013 – Draft policies made available for public comments on County Connection Website

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

Public Comments: None

3 PROPOSAL DESCRIPTION

Continuation of Clipper START & Youth Clipper Discounts

The Clipper START and Youth Clipper fare discounts on County Connection initially launched as a pilot program in January 2021 with a 20% reduction off the single-ride Clipper fare. The discounts increased to 50% off the single-ride Clipper fare in January 2024. Clipper START, a regional initiative by the Metropolitan Transportation Commission (MTC), offers discounted fares to low-income adults (ages 19-64) with incomes at or below 200% of the federal poverty level through a specially encoded Clipper card. MTC provides funding to transit operators to partially offset the program's cost. Recognizing that Clipper START is limited to adults, County Connection introduced a parallel 50% discount for youth riders (ages 6-18), regardless of family income, also using a Youth Clipper card and starting in January 2024.

The enhanced 50% discount spurred greater Clipper adoption than the initial 20% discount. In 2024, Clipper START ridership surged by 169% compared to 2023, when the discount was lower. Similarly, Youth Clipper ridership increased by 14% in the same period. Given the regional success and increased adoption of Clipper START, MTC has proposed making the program permanent after the pilot concludes on June 30, 2025, while continuing partial fare loss reimbursement to transit operators. If approved, County Connection intends to permanently implement the 50% discounts offered through Clipper START, effective July 1, 2025. However, this continuation is contingent on sustained partial reimbursement from MTC.

Furthermore, County Connection will also continue the parallel discounts to youth riders using Youth Clipper cards.

4 EQUITY ANALYSIS

Pursuant to the Title VI Circular, a reduction in fare is a fare change and requires an equity analysis. Because a reduction in fare is a benefit, the disparate impact analysis examines the allocation of benefits from the fare reduction among minority riders who receive the discount relative to their share of the ridership as a whole. Similarly, the 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 Methodology and Data

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 minority and low-income populations. The following actions do not require a fare equity analysis:

- (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. However, 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 Disproportionate Burden Policy require an examination of the cumulative impacts of a fare change. As a result, this analysis determines potential impacts of the proposed changes by comparing the percentages of low-income and minority riders who would receive 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 minority riders would experience a disproportionately lower benefit than non-low-income and non-minority riders due to the proposed fare changes.

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 used to determine eligibility for the Clipper START program.

Data Sources

Onboard Passenger Survey

An onboard passenger survey was conducted on County Connection buses in October and November 2023, and a total of 826 responses were collected. The survey was conducted on both weekdays and weekends using tablet 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 sampling plan included completion goals that were set by route and time period based on ridership.

The onboard passenger survey data provides demographic information on County Connection’s riders, including race and income. Survey 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 median of the selected income bracket to compare against the federal poverty level.

Table 1 below shows how low-income status—defined in this analysis as 200% of the 2023 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 1: Low-Income Thresholds by Household Size

Household Size	Low-Income Threshold
1	Under \$25,000
2	Under \$35,000
3-4	Under \$50,000
5-6	Under \$75,000
7-10	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 continuation of the increased youth fare discount. More specifically, the analysis uses data from the 2023 ACS 5-year estimates for all Census tracts and 2020 Decennial Census for all Block Groups within County Connection’s service area. Staff considered but chose not to use school data from the California Department of Education, after determining that the available data is incomplete because it excludes private schools, which comprise a significant portion of youth within County Connection’s service area.

4.2 Impact Assessment

Clipper START

Based on the Onboard Passenger Survey data, 63.1% of all County Connection riders identify as minority and 59.6% are considered low-income. Of the riders who would qualify for the Clipper START Program, 70.2% identify as minority and all are low-income.

Continuation of Clipper START Fare Discount

There is no disparate impact on minority riders from the continuation of the Clipper START fare discount of 50% (Clipper START Discount). Of the low-income riders who would qualify for the program, 70.2% are minority, which is higher than the system as a whole at 63.1%, by a margin

of +7.1%. Thus, minority riders are more likely to receive the benefits of the Clipper START Discount than non-minority riders.

There is also no disproportionate burden on low-income riders from the continuation 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 proportion of low-income riders on the system as a whole which is at 59.6%, this is a differential of +40.4%. The continuation of the Clipper START Discount does not create a burden on low-income riders. In fact, the continuation benefits low-income riders more than non-low-income riders as demonstrated by 169% growth in ridership numbers since the increase in discount.

Discontinuation of Clipper START Discount

Discontinuation of the Clipper START Discount would not result in a disparate impact on minority riders. The discontinuation of the Clipper START Discount would result in a fare increase for 70.2% of low-income minority riders, which is slightly higher than impact on the system as a whole at 63.1%. The resulting 7.1% difference between the impact to low-income minority riders compared to the system as a whole is within the 20% threshold established by County Connection's Disparate Impact Policy.

Discontinuation of Clipper START Discount would result in a disproportionate burden on low-income eligible riders. Since all low-income eligible riders qualify for the Clipper START Discount, discontinuation would impact 100% of low-income eligible riders. Whereas, discontinuation would impact 59.6% of riders of the overall system. The resulting 40.4% difference between the impact on low-income eligible riders and the overall system riders surpasses the 20% threshold defined in County Connection's Disproportionate Burden Policy. Critically, discontinuation of the Clipper START Discount would double the Clipper fare for affected riders, increasing it by 100% from \$1.00 to \$2.00 per trip.

Table 2 below shows the results of the impact analysis for the Clipper START Discount.

Table 2: Clipper START Discount Impact Analysis Results

	% Minority	% Low-Income
Eligible for Clipper START	70.2%	100.0%
Systemwide	63.1%	59.6%
Difference from Systemwide	+7.1%	+40.4%
<i>Results for Continuation</i>	<i>No Disparate Impact</i>	<i>No Disproportionate Burden</i>
<i>Results for Discontinuation</i>	<i>No Disparate Impact</i>	<i>Disproportionate Burden</i>

Youth Clipper Fare Discount

Based on Decennial Census data, 51.8% of all residents within County Connection’s service area identify as minority, and based on ACS data, 13.6% are considered low-income. Of all residents in the service area that would qualify for a continued increased Youth Clipper Fare Discount (“Youth Discount”), 63.4% are minority, and 13.1% are considered low-income.

Continuation of Youth Clipper Fare Discount

There is no disparate impact on minority riders from continuing the Youth Discount. The percentage of minority youth in County Connection’s service area that qualify for the Youth Discount is higher than the overall minority population in the service area by a margin of +11.6%. Thus, youth minority riders are more likely to receive the benefits of the continued Youth Discount than non-minority riders.

There is also no disproportionate burden on low-income riders from continuing the Clipper Youth Fare Discount. The percentage of low-income youth in County Connection’s service area that qualify for the discount is 13.1% which is slightly lower than the overall low-income population in the service area which is 13.6%. The difference is a margin of -0.5%, which is within the 20% threshold established by County Connection’s Disproportionate Burden Policy.

Discontinuation of Youth Clipper Fare Discount

Discontinuation of the Clipper Youth Fare Discount would not result in a disparate impact on minority riders. The discontinuation would result in a fare increase for 63.4% of minority youth

riders, which is higher than the system as a whole at 51.8%. However, the resulting difference of 11.6% is within the 20% threshold established by County Connection’s Disparate Impact Policy.

The discontinuation of the Clipper Youth Fare Discount would also not have a disproportionate burden on low-income riders. The usage by low-income youth riders is 13.1%, which is slightly lower than the share of the ridership that are low-income on the system as a whole, which is 13.6%. The resulting 0.5% differential is within the 20% threshold established by County Connection's Disproportionate Burden Policy.

Table 3 below shows the results of the impact analysis for the Youth Clipper fare.

Table 3: Youth Clipper Fare Impact Analysis Results

	% Minority	% Low-Income
Eligible for Youth Fare	63.4%	13.1%
Service Area	51.8%	13.6%
Difference from Service Area	+11.6%	-0.5%
<i>Results for Continuation</i>	<i>No Disparate Impact</i>	<i>No Disproportionate Burden</i>
<i>Results for Discontinuation</i>	<i>No Disparate Impact</i>	<i>No Disproportionate Burden</i>

5 PUBLIC OUTREACH

In May 2025, staff began conducting outreach to solicit feedback from the public on the proposed Clipper fare changes. County Connection invited public comment at a public hearing on June 19, 2025, as well as by mail, email, and online through County Connection’s website. Notices for the public hearing were placed on all fixed-route buses, and published in the East Bay Times. Information about the proposed changes was available on County Connection’s website and announced through several social media posts on X (formerly Twitter), Facebook, Instagram, Bluesky, and NextDoor. All materials were translated into Spanish per County Connection’s Limited English Proficiency (LEP) Plan. Copies of outreach materials and public hearing notices are attached in Appendix B.

5.0 Public Comment

[Placeholder for public comment]

**APPENDIX A: RESOLUTION NO. 2013-019 AND
COUNTY CONNECTION'S TITLE VI POLICIES**

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

A handwritten signature in black ink, appearing to read 'Erling Horn', written over a horizontal line.

Erling Horn, Chair, Board of Directors

ATTEST:

A handwritten signature in black ink, appearing to read 'Lathina Hill', written over a horizontal line.

Lathina Hill, Clerk to the Board

Title VI of the Civil Rights Act - Proposed Major Service Change Policy / Disparate Impact Policy / Disproportionate Burden Policy

Summary of Issues:

In October 2012, the Federal Transit Administration released new guidelines for compliance with Title VI of the Civil Rights Act of 1964 (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 new Policy will apply this threshold to both increases and decreases, and provide for changes to be measured not just individually, but on a cumulative basis over a 12-month period.

Proposed 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

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.

APPENDIX B: PUBLIC OUTREACH MATERIALS & NOTICES OF PUBLIC HEARING

Webpage

<https://countyconnection.com/clipper-discounts-2025/>

Social Media Graphics

County Connection

PUBLIC HEARING

**PROPOSED
CLIPPER FARE
DISCOUNTS**

THURS, JUNE 19, 2025 @ 9AM
COMMENT IN PERSON
JOIN US ON ZOOM
COMMENT ONLINE
SEE LINK FOR DETAILS

County Connection

AUDIENCIA PÚBLICA

**CAMBIOS
PROPUESTOS EN LAS
TARIFAS DE CLIPPER**

19 DE JUNIO DEL 2025
A LAS 9:00 AM
GAYLE B. UILKEMA
MEMORIAL BOARD ROOM
2477 ARNOLD INDUSTRIAL WAY
CONCORD, CA 94520
Ver enlace para más detalles

County Connection

PUBLIC HEARING

PROPOSED CLIPPER FARE DISCOUNTS

We're seeking
community input on:

*Continuation of
50% discount
for Clipper START
and Youth Clipper*

SCAN QR CODE
FOR ALL DETAILS ▶



COMMENT IN PERSON

JUNE 19, 2025 @ 9AM

GAYLE B. UILKEMA
MEMORIAL BOARD ROOM
2477 ARNOLD INDUSTRIAL WAY
CONCORD, CA 94520



ZOOM: Be a virtual guest!
(Scan QR code below for link)



CALL-IN: 408-638-0968
Meeting ID: 853 9913 3311

WRITTEN COMMENTS *



VIA MAIL

Director of Planning & Marketing
2477 Arnold Industrial Way
Concord, CA 94520



VIA EMAIL

planning@countyconnection.com

COMMENT ONLINE

countyconnection.com/clipper-discounts-2025

** Written comments must be
received by June 11, 2025.*

County Connection

AUDIENCIA PÚBLICA

CAMBIOS PROPUESTOS EN LAS TARIFAS DE CLIPPER

Estamos buscando
la opinión de la
comunidad sobre:

*Continuación
del 50% de
descuento para
Clipper START y
Youth Clipper*

ESCAÑEA EL CÓDIGO
QR PARA TODOS
LOS DETALLES ▶



COMENTA EN PERSONA

19 DE JUNIO DEL 2025
A LAS 9:00 AM

GAYLE B. UILKEMA
MEMORIAL BOARD ROOM
2477 ARNOLD INDUSTRIAL WAY



¡Sé un/a invitado/a virtual!
Escanee el código QR a
continuación para ver el enlace



LLAMAR: 408-638-0968
Identificación de la reunión:
853 9913 3311

COMENTARIOS POR ESCRITO *



POR CORREO

Director of Planning & Marketing
2477 Arnold Industrial Way
Concord, CA 94520



POR CORREO ELECTRÓNICO

planning@countyconnection.com

COMENTE POR INTERNET

countyconnection.com/clipper-discounts-2025

* Los comentarios escritos deben recibirse
antes del 11 de junio del 2025

Legal Notice

To be published on June 3rd, 2025

APPENDIX C: PUBLIC COMMENTS

All comments are presented as submitted online or in written communication, no revisions (such as to correct misspellings) were made.

#	Public Comment	Staff Response
1	[Placeholder]	[Placeholder]
2	[Placeholder]	[Placeholder]
3	[Placeholder]	[Placeholder]
4	[Placeholder]	[Placeholder]

APPENDIX D: RESOLUTION NO. 2025-XX

[Placeholder]