County Connection

To: Board of Directors **Date:** September 24, 2025

From: Pranjal Dixit, Manager of Planning **Reviewed by:** AMS

SUBJECT: Service Equity Analysis – Proposed Route 4 changes

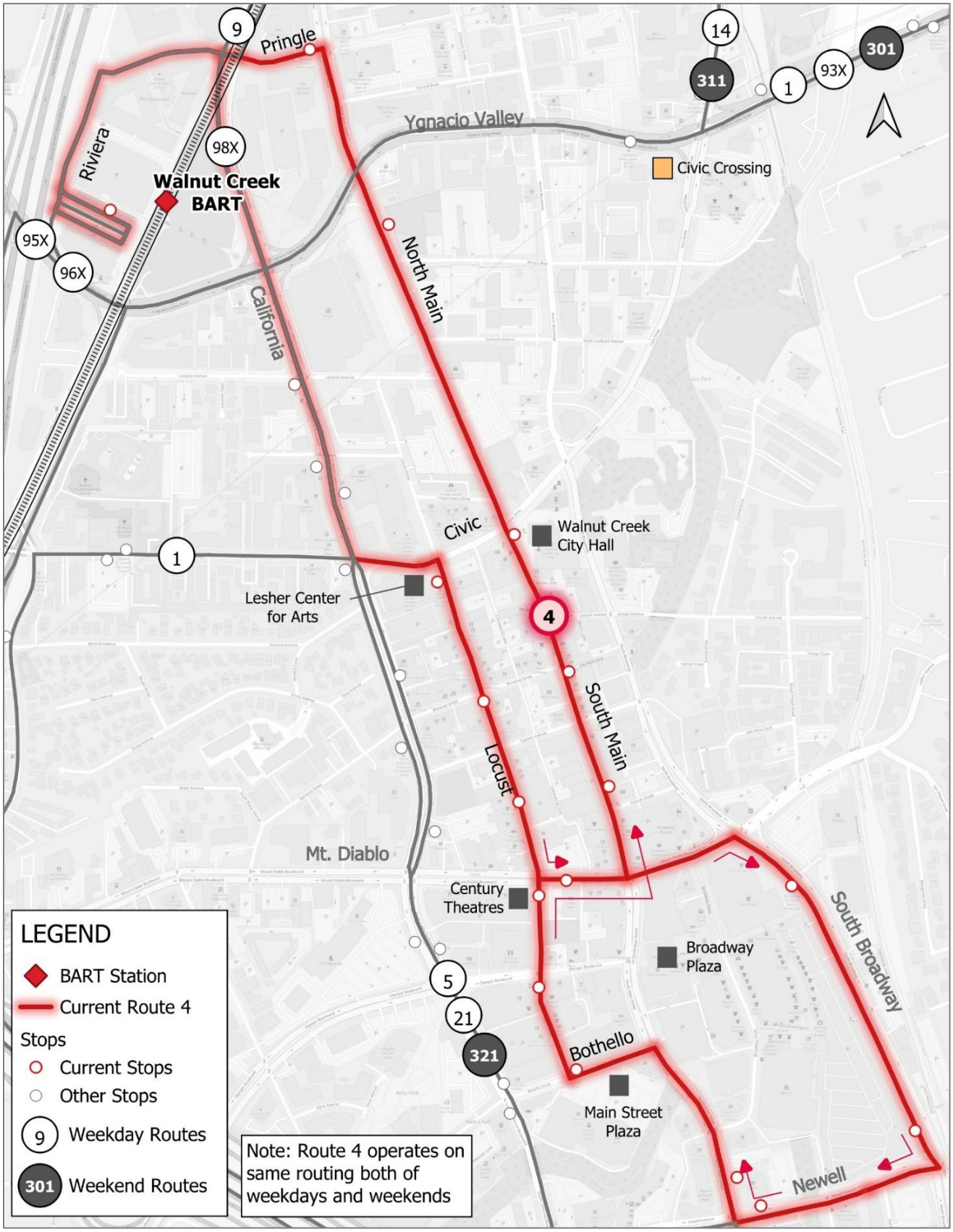
Background:
For several decades, County Connection has operated the Walnut Creek Downtown Circulator as a vital public transit service. Initially known as Route 104, it was later redesignated as Route 4. Since the 1980s, the City of Walnut Creek has partnered with County Connection to provide a fare subsidy, making rides free on weekdays and Saturdays. Subsequent agreements expanded the free service to seven days a week. Notably, Route 4 is the only route in the system served by the prototype Gillig Electric "Trolleys".

The route originally connected Walnut Creek BART directly to downtown, but its alignment was changed in the early 2000s to accommodate the construction of Plaza Escuela and the Locust Street extension, adding a complex figure-8 movement with multiple left turns. The route was further impacted by a temporary reroute in response to the closure of Broadway Plaza (the street that passes through the shopping mall of the same name) during the COVID-19 pandemic. These changes, combined with increased traffic, led to significant congestion and delays, affecting the route's on-time performance and the charging time available for the electric buses.

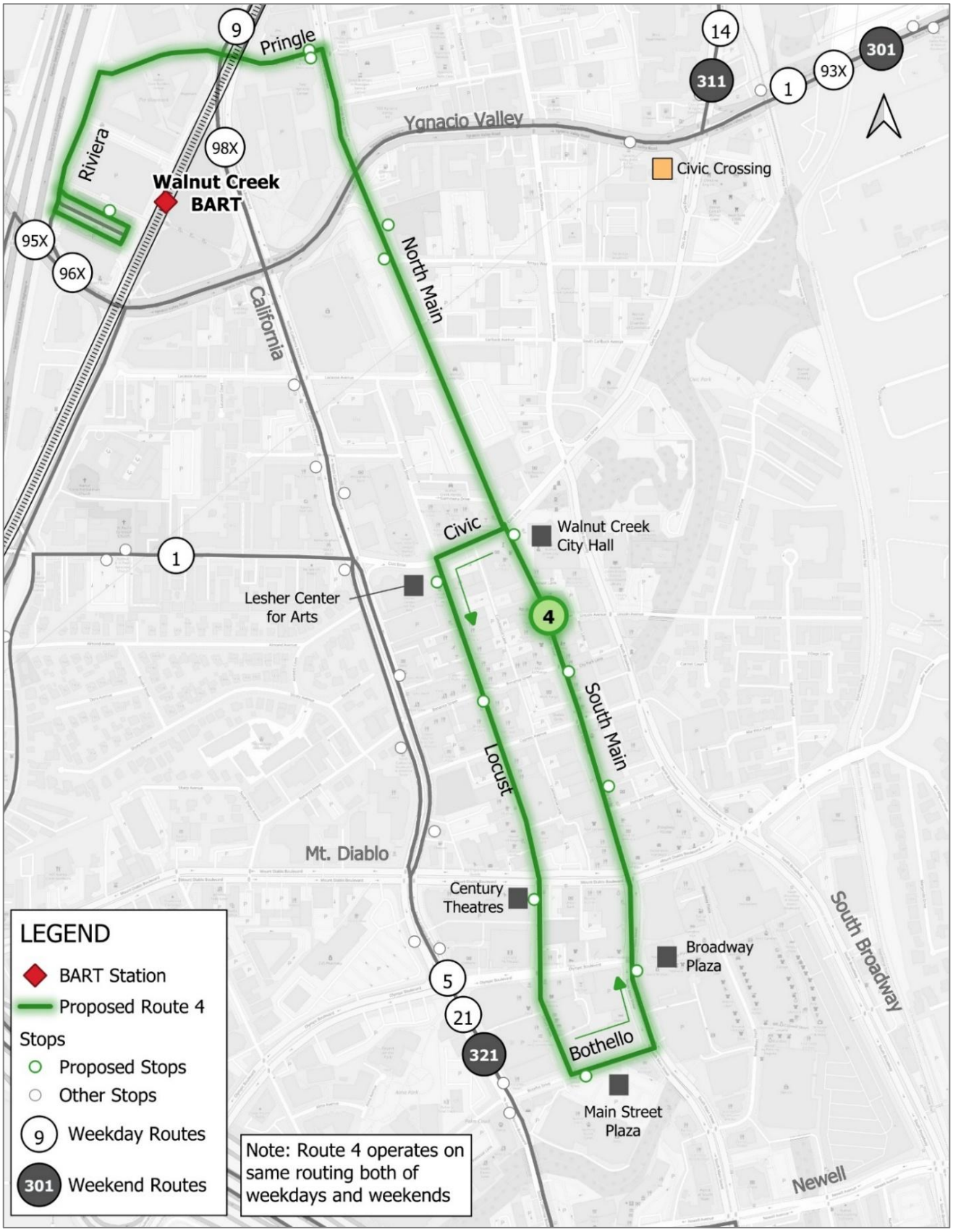
Service Change:
In September 2025, staff presented a service change proposal for Route 4 to address ongoing operational challenges. The proposal included a new alignment and improvements to service frequency. The route, which historically connected the Walnut Creek BART station with downtown Walnut Creek, has faced increasing delays due to traffic, complex turns, and frequent stops, which have also impacted the availability of charging time for its electric buses.

The proposed changes aim to streamline the route for better reliability, as shown in the figures below. The plan involves a new alignment, optimization of bus stop locations, and future upgrades to meet current ADA standards in coordination with the City of Walnut Creek. Additionally, staff had previously partnered with the City of Walnut Creek and RCD Housing on an Affordable Housing and Sustainable Communities (AHSC) Grant for the Civic Crossing project, a new affordable housing development at 699 Ygnacio Valley Road. The grant was awarded in April 2024 and provides operating funds to restore the route's weekday service to a 15-minute frequency from 7 a.m. to 9 p.m., for a period of approximately five years.

CURRENT ROUTE 4 ALIGNMENT



PROPOSED ROUTE 4 ALIGNMENT



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 service changes and fare changes to assess the impacts of those changes on low-income and minority populations. As the proposal includes significant change to the alignment as well as amount of service, it results as a major service change requiring an equity analysis under the FTA's Title VI regulations.

Equity Analysis:

Staff completed a Title VI Service Equity Analysis for the proposed route. The proposal includes a significant change to the alignment as well as an increase in number of trips by more than 25%, so it is considered a “major” service change under County Connection’s Major Service Change Policy.

As part of the 2013 Title VI Policy update, the Board established a threshold of 20% for determining both disparate impacts to minorities and disproportionate burdens on low-income populations. The analysis evaluates the impacts of the service plan by comparing the proportion of minority and low-income riders who would be affected by the change to the system as a whole. The service equity analysis did not indicate any disparate impact to minorities or disproportionate burden on low-income populations as result of the proposed service changes.

The analysis of the proposed service changes utilized a "people-trip" methodology to evaluate the impact on different populations, particularly those protected under Title VI regulations. This metric combines two key factors: the number of potential riders in an area and the frequency of bus service available to them.

While minority riders would be impacted more than their proportion of population systemwide, the differential of -17.8% is within the 20% threshold set forth in the disparate impact policy. Low-income riders would be impacted less than their proportion of population on the system as a whole by a margin of 2.8%. Importantly, despite these differential impacts, the changes are projected to result in an overall net increase in service for both groups. Specifically, minority riders are estimated to see an increase of 4.9 million people-trips, while low-income riders are projected to gain 2.2 million people-trips.

Route 4			Systemwide	Delta	Disparate Impact
Change in People Trips	Change in Minority People-Trips	% of Change in Minority People-Trips	% Minority People Trips		
12,871,099	4,900,955	38.1%	55.9%	**-17.8%**	**No**

Route 4			Systemwide	Delta	Disproportionate Burden
Change in People Trips	Change in Low-Income People-Trips	% of Change in Low-Income People-Trips	% Low-Income People Trips		
12,871,099	2,249,069	17.5%	14.7%	**+2.8%**	**No**

Public Outreach:
In September 2025, staff undertook a community outreach program to receive public comment on the proposed service change. A public hearing has been scheduled for October 16th preceding the Board of Directors meeting. The public may also submit written comments via mail, email, and online through County Connection's website. As of September 24, 2025, one comment has been received, which requested consideration for serving the Kaiser Permanente Walnut Creek Medical Center on South Main Street at Newell Avenue (note: the medical center is already served by Routes 5 and 21, both of which provide service to the Walnut Creek BART station via California Blvd.). The deadline for written comments is October 8th, 2025. All comments received will be included in the final Title VI report, which will be presented to the FTA.

Financial Implications:
The costs associated with operating the additional service for approximately five years are fully covered by the Affordable Housing and Sustainable Communities (AHSC) Grant for an amount up to $4,154,266.

Recommendation:
Staff recommends that the MP&L Committee forward the attached Title VI 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 MP&L Committee forward this item to the Board for approval.

Attachments:
Attachment 1: Title VI Equity Analysis

County Connection

Title VI Service Equity Analysis

Route 4 Service Enhancement

CENTRAL CONTRA COSTA TRANSIT AUTHORITY
October 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 major service changes to assess the impacts of those changes on low-income and minority populations.

County Connection is proposing significant service changes to Route 4, consisting of (1) permanent route alignment modifications to address congestion and delays on the current route, and (2) an increase in weekday frequency, as further described in Section 3 below. The proposed weekday service enhancement will increase frequency from 20 minutes to 15 minutes between 7 a.m. and 9 p.m. While the route alignment changes are permanent, continuation of increased frequency is contingent on County Connection securing funds from future grants or other sources.

The proposed changes constitute a major service change requiring an equity analysis under the FTA's Title VI regulations and County Connection's Title VI Policies. The following equity analysis concludes that the proposed changes will not have a disparate impact based on race, color, or national origin, place a disproportionate burden on low-income riders, or disproportionately benefit non-low-income riders.

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 the 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, referred to collectively as "County Connection Title VI Policies." County Connection’s Board of Directors adopted these policies in June 2013. The adopted County Connection Title VI Policies, which

apply to equity analyses, are described below. Resolution No. 2013-019 demonstrates the Board's consideration, awareness, and approval of these policies, and is included in Appendix A.

2.1 Major Service Change Policy

The Major Service Change Policy establishes a threshold for when a proposed service increase or decrease is "major," and thus must be subject to a Title VI Equity Analysis.

County Connection defines a major service change as:

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

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

The following service changes are exempt from this policy:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered "major" unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.

2.2 Disparate Impact Policy

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

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

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

2.3 Disproportionate Burden Policy

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

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

2.4 Public Outreach for Development of Title VI Policies

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

Route 4 Alignment Change

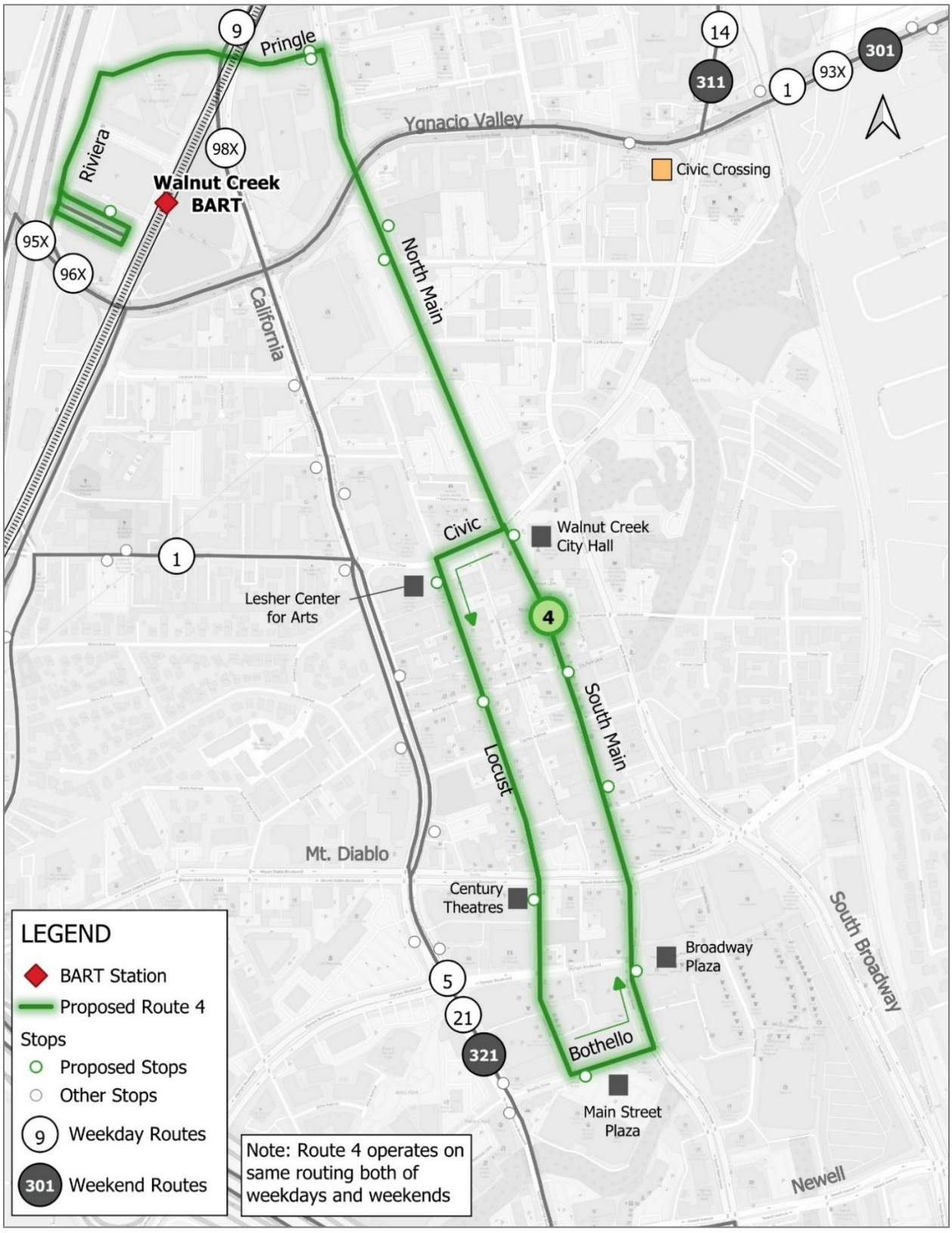
For several decades, Route 4 has connected the Walnut Creek BART station to downtown Walnut Creek, including the Broadway Plaza shopping mall. After the construction of the Plaza Escuela shopping mall and the Locust Street extension in the early 2000s, the route was changed to a figure-eight pattern. This change added two left turns and required travel twice per trip along the same stretch of Mt. Diablo Boulevard, which increased travel time.

During the COVID-19 pandemic, the closure of Broadway Plaza (the street passing through the shopping mall of the same name) forced a reroute along South Broadway and Newell Avenue. As ridership and traffic returned after the pandemic, significant congestion occurred along this reroute. The numerous left turns and frequent stops also caused delays, making it difficult to maintain on-time performance and provide time to recharge the electric buses that operate the route.

The new proposed route shown in Figure 1 aims to address these issues by:

- **Streamlining the route** to provide more reliable and efficient service while still serving popular destinations.
- **Improving bus stops** in partnership with the City of Walnut Creek to meet current Americans with Disabilities Act (ADA) standards.
- **Optimizing stop locations** by balancing stop spacing and moving stops to the far side of intersections where possible. This strategy leverages the Transit Signal Priority (TSP) system to improve on-time performance.
- **Leveraging existing pedestrian infrastructure** to make it easier for people to get to and from bus stops, allowing the buses to focus on providing frequent and reliable service.

Figure 1: Proposed Route 4 Alignment



Route 4 Frequency Improvement:

County Connection partnered with the City of Walnut Creek and Resources for Community Development (an affordable housing developer) in applying to the State of California for an Affordable Housing and Sustainable Communities (AHSC) Grant for the **Civic Crossing** project, a new affordable housing development at 699 Ygnacio Valley Road. The grant was awarded in August 2024, and provides operating funds to increase frequency on Route 4 from every 20 minutes to every 15 minutes on weekdays from 7 a.m. to 9 p.m.

If approved, the changes would take effect on January 11th, 2026 While the route alignment changes are permanent, continuation of increased frequency is contingent on County Connection securing funding from future AHSC Grants or other sources.

4 EQUITY ANALYSIS

The proposal includes changing alignment and increasing frequency on Route 4 that affects more than 25% of the daily passenger trips and daily transit revenue miles on the days of the week for which the changes are made, thereby meeting County Connection's definition of a "major service change." This analysis evaluates the changes at the route level as well as at a system level to determine the impact of the major service change pursuant to the Title VI Circular.

4.1 Data and Methodology

Definitions

Minority – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

Low-Income – FTA defines a low-income person as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. However, FTA encourages the use of any locally developed threshold provided that the threshold is at least as inclusive as the HHS poverty guidelines. Due to the higher cost of living in County Connection's service area, County Connection defines low-income as 150% of the federal poverty level.

Data Sources

Onboard Passenger Survey

A systemwide onboard survey was conducted in October-November 2023 to gather demographic data from riders. However, this survey only provided data at the route level, not for individual stops. Given that the proposed service changes directly impact specific stop locations, data from the 2023 American Community Survey 5-Year Estimates were used to estimate the impact on transit access.

American Community Survey

The American Community Survey (ACS) is an ongoing survey that provides vital information regarding demographics and employment. The analysis uses data from the 2019-2023 ACS 5-year estimates for all Census block groups within County Connection's service area.

- The population data is coded by table B03002, field B03002001.
- Low-income status is set at 150% the federal poverty level. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).

Methodology

This analysis was conducted using QGIS. QGIS is a free and open-source geographic information system, or GIS, software used for viewing, editing, and analyzing geospatial data. This analysis evaluated the impact of the proposed service changes on service availability for low-income and minority populations using a metric called "people-trips."

A "people-trip" is a comparative metric that considers two factors: the (1) potential ridership population, and (2) frequency of bus trips serving that population. By accounting for both access (bus stops) and population density, the metric provides a comprehensive way to assess changes in service that could affect protected populations.

The methodology used was as follows:

1. **Estimated Population:** The estimated population near each route was calculated, including low-income and minority percentages. This was done by outlining the area

within a quarter-mile of any stop—a standard distance used in transit planning to represent the typical distance people are willing to walk to access public transportation, also known as “walkshed.” This area was then overlaid with 2019-2023 ACS 5-year estimates, with the block group statistics weighted by their percentage of overlap to determine the total population served by the route.

2. **People-Trips:** The number of "people-trips" was calculated by multiplying the population within the walkshed by the route's annual number of trips. This was repeated for low-income and minority populations. These figures were then compared between the "before" and "after" versions of the route to find the differences.

3. **Total System-Wide Impact:** The process was repeated for every route in the transit system, and the differences in people-trips were summed together to get the total change across the system. This produced key numbers for the overall, low-income, and minority people-trip differences.

4. **Change by Population:** The percentage of change borne by low-income and minority populations was calculated by dividing the total difference in their respective people-trips by the total difference in overall people-trips.

5. **Threshold Comparison:** Finally, these percentages were compared to the system-wide averages of the low-income and minority populations to determine if the changes exceeded the disparate impact or disproportionate burden thresholds of 20%.

4.2 Impact Assessment

Table 1 below shows the population within the quarter-mile radius of the bus stops used for the impact assessment according to the methodology outlined above. This includes estimated population served on the current alignment, estimated population served on the proposed alignment, and percentages of minority and low-income population from the ACS data.

Table 1: Population Stats

Route	Total Population (within 0.25-mile radius of bus stop)	Low-income Population	% Low-income	Minority Population	% Minority
Current Rt 4	7,502	911	12.1%	3,077	41.0%
Proposed Rt 4	6,485	827	12.8%	2,638	40.7%
Systemwide	*654,565*	*92,194*	*14.1%*	*361,313*	*55.2%*

Table 2 illustrates how potential transit access is measured using "people-trips," a metric that accounts for both the number of available transit trips and the density of the population. People-trips is calculated by multiplying population with number of trips.

Table 2: Access to Transit Stats

Route	Weekday Trips	Weekend Trips	Annual Total people-trips	Annual Low-income people-trips	Annual Minority people-trips
Current Rt 4	41	28	100,278,438	12,176,843	41,126,904
Proposed Rt 4	57	28	113,149,537	14,425,912	46,027,859
Difference	**+16**	**-**	**+12,871,099**	**+2,249,069**	**+4,900,955**
Systemwide	*891*	*297*	*5,039,264,646*	*739,371,375*	*2,814,956,682*

Table 3 summarizes the results of the analysis. According to 2023 ACS data, the general population living within a quarter-mile of a Route 4 bus stop is 55.9% minority and 14.7% low-income.

Table 3: Service Equity Analysis Results

Route 4			Systemwide	Delta	Disparate Impact
Change in People Trips	Change in Minority People-Trips	% of Change in Minority People-Trips	% Minority People Trips		
+12,871,099	+4,900,955	+38.1%	+55.9%	**-17.8%**	**No**
Route 4			**Systemwide**	**Delta**	**Disproportionate Burden**
Change in People Trips	**Change in Low-Income People-Trips**	**% of Change in Low-Income People-Trips**	**% Low-Income People Trips**		
+12,871,099	+2,249,069	+17.5%	+14.7%	**+2.8%**	**No**

Conclusion

Based on the analysis above, the proposed service change will not have a disparate impact on minority riders or a disproportionate burden on low-income riders. On the contrary, the proposed changes will result in increased service for both groups, with low-income populations benefiting relatively more than non-low-income populations and minority populations benefiting only marginally less than non-minority populations. The number of people-trips is estimated to increase by 4.9 million for minority riders and 2.2 million for low-income riders.

5 PUBLIC OUTREACH

In September 2025, staff began conducting outreach to solicit feedback from the public on the proposed Route 4 changes. County Connection invited public comment at a public hearing on October 16, 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, a newspaper of general circulation. Information about the proposed changes was also 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]

A summary of the public comment received is attached in Appendix C.

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

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

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

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

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

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

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

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

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

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

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

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

NOES: Directors Dessayer and Weir

ABSTENTIONS: None

ABSENT: Directors Hudson and Storer

Erling Horn, Chair, Board of Directors

ATTEST:

Lathina Hill, Clerk to the Board

County Connection

INTER OFFICE MEMO

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.

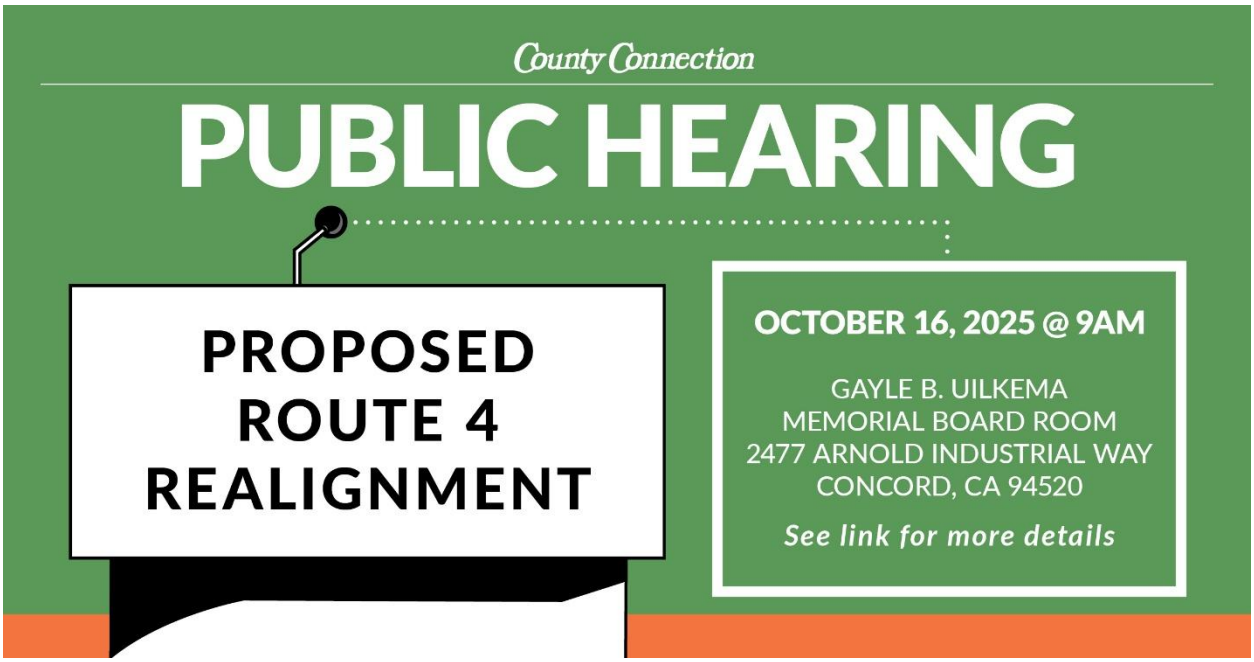
Proposed Policy:
County Connection establishes that a fare change, major service change or other policy has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations unless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

APPENDIX B: PUBLIC OUTREACH MATERIALS & NOTICES OF PUBLIC HEARING

Webpage

https://countyconnection.com/public-hearing-route-4-alignment-change/

Social Media Graphics



Legal Notice

NOTICE OF PUBLIC HEARING

The Central Contra Costa Transit Authority (County Connection) will hold a public hearing to receive public comment on the following proposed changes to Route 4:

- Change to the alignment to streamline route and improve reliability.
- Increase to the frequency on weekdays to bus every 15 minutes.

Further information on the service enhancement proposal is available on the County Connection website or by calling (925) 676-7500.

Comments can be submitted in writing via mail, email, or online, or at the scheduled public hearing. Written comments must be received by October 8, 2025. It is anticipated that the Board of Directors will take action on the proposed fare changes at their regular meeting scheduled for October 16, 2025, following the public hearing.

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

Email: planning@countyconnection.com

Online: https://countyconnection.com/public-hearing-route-4-alignment-change/

Public Hearing: Thursday, October 16, 2025 at 9:00 am
Gayle B. Uilkema Memorial Board Room
2477 Arnold Industrial Way
Concord, CA 94520

Teleconference option:
Web link: https://us02web.zoom.us/j/85399133311
By phone: 408-638-0968 (Meeting ID: 853 9913 3311)

Bill Churchill, General Manager
Central Contra Costa Transit Authority
2477 Arnold Industrial Way
Concord, CA 94520
CCT 6921910; Sep. 24; Oct. 6, 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	Would like to see it run down to Newell to serve Kaiser. Otherwise seems fine.	None
2	[Placeholder]	[Placeholder]
3	[Placeholder]	[Placeholder]
4	[Placeholder]	[Placeholder]

APPENDIX D: RESOLUTION NO. 2025-XX