

To: Operations & Scheduling Committee

Date: January 26, 2026

From: John Sanderson, Director of ADA & Specialized Services

Reviewed by: *W.C.*

SUBJECT: LINK Paratransit Service Area

Background:

Title II of the Americans with Disabilities Act (ADA) of 1990 requires all public transit operators in the United States to provide specialized, adaptive transportation “complementary” to their fixed route transit offerings for individuals who have disabilities that prevent them from independently using the fixed route transit network some or all of the time. This specialized service is generally known as “ADA paratransit” or simply “paratransit.” Although federally mandated, ADA paratransit service is typically not federally funded.

The basic requirement for transit agencies to provide ADA paratransit service is codified in Title 42 of the United States Code (42 USC §12143) and is implemented in detail by the Federal Transit Administration (FTA) Title 49 of the Code of Federal Regulations (49 CFR §37.131). To meet these obligations, County Connection operates the County Connection LINK paratransit program. Due to long-developing service challenges that accelerated during the COVID-19 pandemic, as well as the current uncertainty about Bay Area transit funding for the foreseeable future, an updated Board policy regarding the LINK paratransit service area will provide a structured direction when addressing service needs.

ADA Paratransit Basics:

49 CFR §37.131 dictates that ADA paratransit programs must satisfy a variety of criteria, including:

- Service must be provided “to origins and destinations within corridors with a width of three-fourths [$\frac{3}{4}$] of a mile on each side of each fixed route”
- Service must be provided during the same days and hours as the fixed route is in operation
- Pickup times may be negotiated up to one hour before or after the time requested by the rider
- Riders can book trips up to the close of business the day before their scheduled pickup
- Fares cannot exceed two times the operator’s undiscounted adult fare (for example: County Connection’s adult “cash” fare is \$2.50, therefore the LINK fare can be up to \$5.00, per one-way trip)
- Service cannot be restricted or prioritized in any way according to trip purpose, and
- Service must be provided free of “capacity constraints” including “any operational pattern or practice that significantly limits the availability” of the service to eligible riders

In addition to the criteria outlined above, the regulations do permit operators to offer “premium” paratransit service that exceeds ADA paratransit requirements, provided that “providing premium

service does not lead to lower service quality for riders using the regular complementary paratransit service.”

County Connection LINK History and Service Area:

Following passage of the ADA, County Connection LINK was created by Board Action in May 1990, via a planned consolidation of several pre-existing local programs. At that time, the LINK service area consisted of a hand-drawn map divided into five fare zones, and operating hours were limited to 8:00 AM to 5:00 PM, Monday through Friday, with no service available on weekends (see Attachment A). Since 1990, federal guidance has advanced significantly, most recently in the form of FTA Circular 4710.1 Americans with Disabilities Act (ADA): Guidance in 2015.

County Connection LINK operates seven days a week during roughly the same hours as County Connection’s fixed route buses. However, LINK also provides service well beyond the federally required ¼ mile service area. In November 2005, the Board adopted resolution 2006-22, which defined the LINK service area as extending 1½ miles on either side of each County Connection bus route, in accordance with a little-used option included in 49 CFR §37.131: “Outside of the core service area, the entity may designate corridors with widths from three-fourths [¾] of a mile up to one and a half [1½] miles on each side of a fixed route, based on local circumstances” (see Attachment B) Over the past 20 years, in response to various community needs, service has also increasingly been provided beyond even the 1½ mile boundary – particularly since the start of the COVID-19 pandemic (See Attachment C).

In FY25, County Connection spent approximately \$482,000 providing LINK paratransit service outside of the federally mandated ¼ mile service area. Table 1 provides a month-by-month breakdown for Fiscal Year 2024/25 of LINK paratransit trips: a) within ¼ of a mile (Required), b) between ¼ and 1 ½ miles (Optional), and c) more than 1 ½ miles (Premium) from County Connection’s fixed bus routes.

Table 1:

FY25	Within ¼ Mile - Required			¾ to 1½ Miles - Optional			Beyond 1 ½ Mile - Premium		
	Trips	Hours	Cost	Trips	Hours	Cost	Trips	Hours	Cost
Jul	7,527	6,769	\$733,284.07	300	323	\$29,226.15	83	101	\$8,085.90
Aug	8,144	6,593	\$728,270.12	321	284	\$28,705.15	122	145	\$10,909.74
Sep	7,983	6,259	\$708,999.61	282	251	\$25,045.46	140	131	\$12,433.92
Oct	8,736	6,949	\$765,574.67	263	236	\$23,047.86	128	140	\$11,217.21
Nov	7,326	5,999	\$673,398.36	257	157	\$23,623.17	152	148	\$13,971.68
Dec	7,434	6,280	\$690,104.41	302	217	\$28,034.91	142	125	\$13,181.98
Jan	8,068	6,718	\$728,112.65	219	145	\$19,764.09	169	191	\$15,251.74
Feb	7,403	6,421	\$702,174.19	323	242	\$30,636.53	146	154	\$13,848.09
Mar	8,031	6,546	\$720,214.56	377	271	\$33,809.10	162	172	\$14,528.05
Apr	8,256	6,183	\$706,179.99	333	192	\$28,483.28	161	167	\$13,771.19
May	7,883	5,859	\$680,058.95	308	178	\$26,570.87	167	158	\$14,406.93
Jun	7,530	5,599	\$661,019.77	362	212	\$31,778.11	137	137	\$12,026.52
Total	94,321	76,175	\$8,497,391.36	3,647	2,706	\$328,724.68	1,709	1,770	\$153,632.96

At present, County Connection’s ability to provide LINK service is such that providing premium service outside of the federally mandated ¼ mile or the Board designated 1½ mile service area does not

noticeably impact the service quality within the ¾ mile boundary. However, unlike fixed route bus service, where increased ridership tends to increase the productivity of existing service, increased demand for paratransit trips translates directly to additional vehicles and drivers deployed, at significant cost to the operator.

New Service Area Policy:

While there is no federal mandate for County Connection to provide fixed route bus service in any given place or time, there is such a mandate for LINK paratransit, and care must be taken to ensure that future LINK program developments remain compliant while also effectively meeting County Connection’s evolving needs. A clearly defined Board-approved service area policy can help distinguish between County Connection’s federally mandated ADA paratransit service and other programs, provide the underlying policy framework needed to control costs by rapidly scaling operations in the event of a sudden loss of revenue or spike in paratransit demand, and safeguard the authority against the potential loss of federal funding in the event that trip demand begins to outstrip resources. A new policy will also equip staff with essential tools to seek outside funding for the paratransit-adjacent non-ADA accessible mobility services that County Connection is increasingly called upon to provide. County Connection is therefore in need of a comprehensive service area policy to guide operations, mitigate systemic risk, and support future funding applications.

Financial Implications:

To be determined based on feedback.

Recommendation:

None – Information Only

Action Requested:

None – Information Only

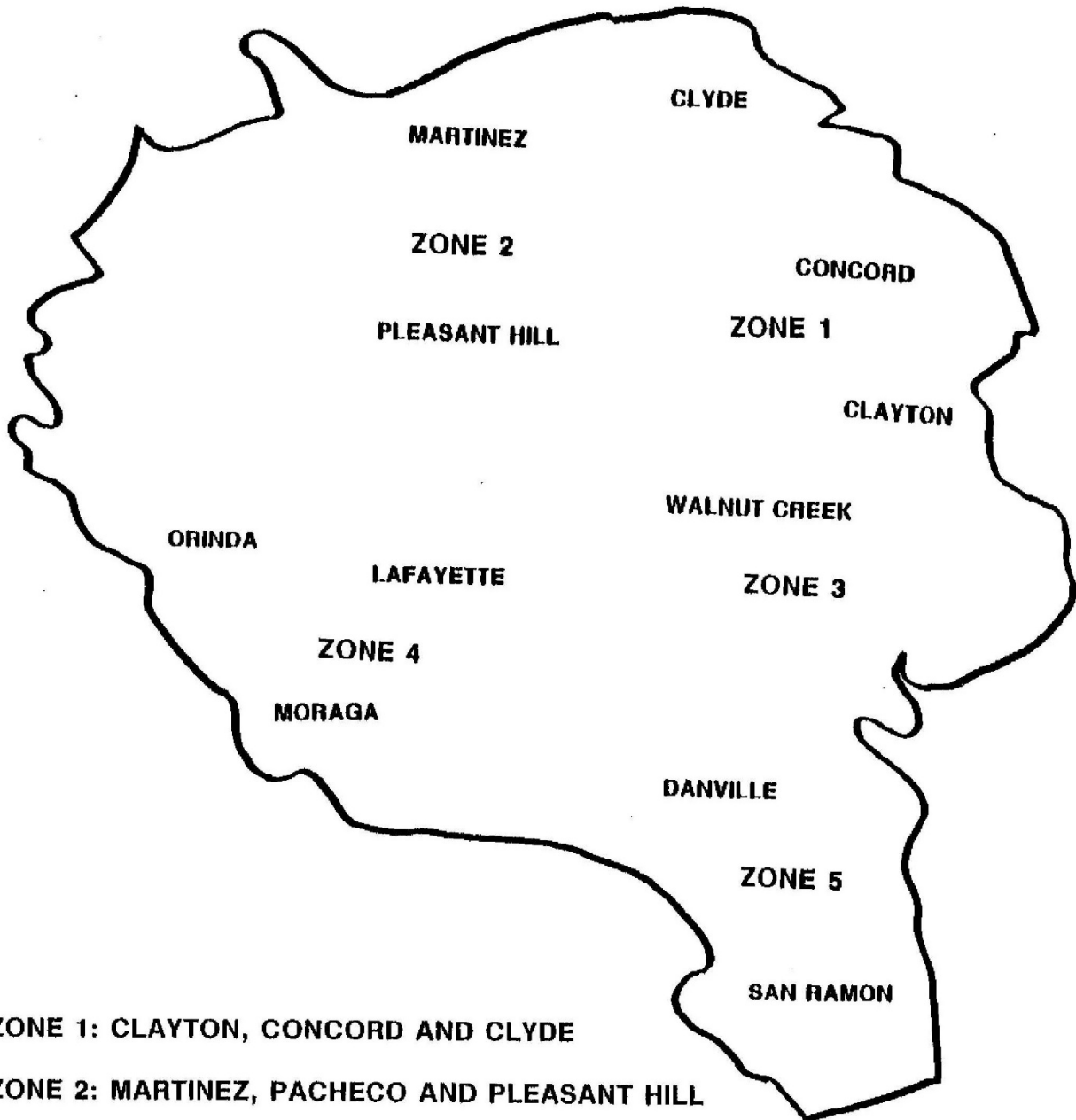
Attachments:

Attachment A: County Connection LINK 1990 Service Area Map

Attachment B: County Connection LINK 1½ Mile Service Area Boundaries Map (per 2005 Policy)

Attachment C: County Connection LINK 2025 de-facto Post COVID-19 Service Area Map

Attachment A: County Connection LINK 1990 Service Area Map



ZONE 1: CLAYTON, CONCORD AND CLYDE

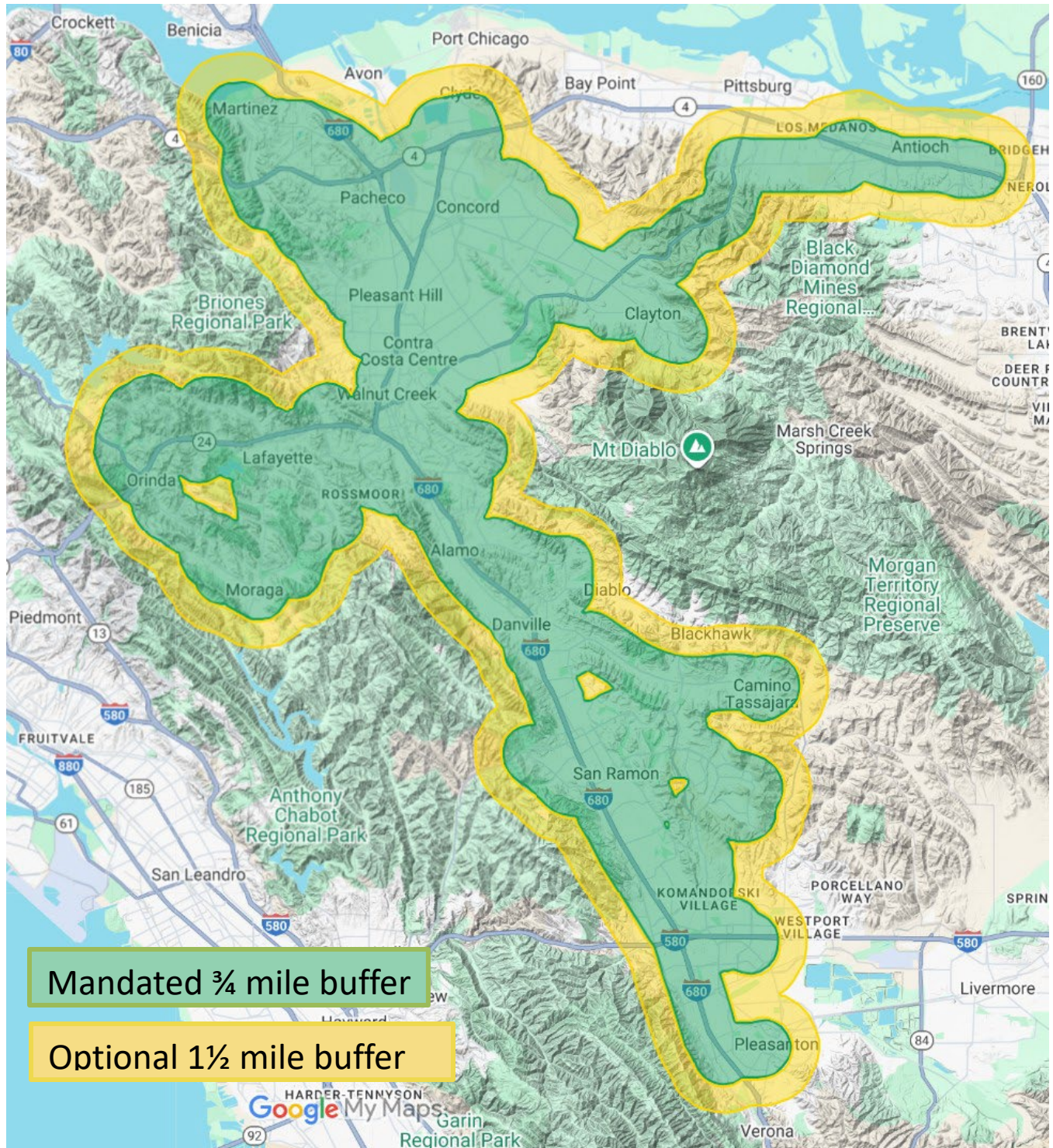
ZONE 2: MARTINEZ, PACHECO AND PLEASANT HILL

ZONE 3: WALNUT CREEK

ZONE 4: LAFAYETTE, MORAGA AND ORINDA

ZONE 5: DANVILLE, ALAMO AND SAN RAMON

Attachment B: County Connection LINK 1½ Mile Service Area Boundaries Map (per 2005 Policy)



Attachment C: County Connection LINK 2025 de-facto Post COVID-19 Service Area Map

