

**To:** Board of Directors

**Date:** March 11, 2026

**From:** John Sanderson, Director of ADA & Specialized Services

**Reviewed by:** *Ref*

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**SUBJECT: County Connection LINK Paratransit Service Area Policy**

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**Background:**

Per Federal regulation established under the Americans with Disabilities Act (ADA), public transit operators including County Connection must provide “ADA paratransit” service “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” during the same days and hours as the fixed route is in operation. (49 CFR §37.131) County Connection’s ADA paratransit service is known as “County Connection LINK.” In November 2005, the County Connection Board of Directors exercised a little-used option included in the regulations and designated a revised County Connection LINK service area comprised of “corridors with a width of one and one-half [ $1\frac{1}{2}$ ] miles on each side of each fixed route” (Resolution No. 2006-22).

In response to various community needs from 2005 to 2025, particularly during the COVID-19 pandemic, County Connection LINK’s real service footprint further expanded beyond even the  $1\frac{1}{2}$  mile boundary. Transit operators are permitted to provide “premium” paratransit service that exceeds ADA requirements – so long as doing so “does not lead to lower service quality for riders using the regular complementary paratransit service. For example, providing trips beyond the [mandated ( $\frac{3}{4}$  mile)] service area is inadvisable if doing so might limit the service quality for trips within the  $\frac{3}{4}$ -mile service area.” (Federal Transit Administration Circular 4710.1 §8.7) This policy revision administratively divides the County Connection LINK service area into three distinct tiers, as shown in Table 1.

Table 1: LINK Service Area Tiers

Service Area Tier	Service Area Name	Distance from Fixed Route
1	Mandated Service Area	Up to $\frac{3}{4}$ of a mile, during fixed-route hours
2	Board-Adopted Service Area	Between $\frac{3}{4}$ and 1.5 miles
3	Extended Service Area	More than 1.5 miles

The federally mandated corridor extending  $\frac{3}{4}$  of a mile from each County Connection route will be referred to as the “Mandated” Service Area. The area extending from  $\frac{3}{4}$  of a mile to  $1\frac{1}{2}$  miles from each County Connection route will be the “Board-Adopted” Service Area. Lastly, areas within Central Contra

Costa County that are more than 1½ miles from the nearest County Connection route will be the “Extended” Service Area. The actual boundaries separating the three service area tiers will vary by day and time, depending on which routes are in service, as shown in Attachments A through D.

**Proposed Three-Tiered Service Area:**

Tier 1 – Mandated Service Area: — Within ¾ of a mile of a County Connection bus route, while the route is in operation, all service criteria mandated by Federal regulations for ADA paratransit trips, are applicable to County Connection LINK service, regardless of circumstances. Service quality within the ¾ mile Mandated Service Area is County Connection LINK’s highest operational priority.

Degradation of service quality within the Mandated Service Area while service within the Board-Adopted and Extended Service Areas is provided can impact all Federal capital and operational funding allocations. Table 2 shows the relationship between pickup and drop-off service areas and the categorization of a given trip as either ADA mandated or “premium”. Any trip beginning or ending outside of the Mandated Service Area is a premium trip, under the applicable regulations.

Table 2: ADA-Mandated vs. Premium Trips by Pickup and Drop-Off Service Area Tier

Origin	Destination	Trip Category
Mandated Service Area (During fixed-route hours)	Mandated Service Area	ADA Mandated Trip
Mandated Service Area	Board-Adopted & Extended Service Areas	Premium Trip
Mandated Service Area (Outside of fixed-route hours)	Any	Premium Trip
Board-Adopted & Extended Service Areas	Any	Premium Trip

Tier 2 – Board-Adopted Service Area: — LINK paratransit service to and/or from locations between ¾ of a mile and 1½ miles from the nearest County Connection route. The service criteria required for ADA trips within the Mandated Service Area are not required for trips beginning and/or ending in the Board-Adopted and Extended Service Areas. For example: trips beginning or ending in the Board-Adopted or Extended Service Areas may be charged a higher fare, be provided only during limited hours, or prioritized based on trip purpose.

Tier 3 – Extended Service Area: — LINK paratransit service to and/or from locations in the Extended Service Area, more than 1½ miles from the nearest operating County Connection route provides an essential lifeline for customers living in certain rural portions of Contra Costa County. However, trips beginning or ending within the Extended Service Area are costly for County Connection to provide and consume a greater than normal share of overall system resources.

Existing subscription trips will continue if funding allows and service within the Mandated and Board-Adopted Service Areas is not impacted. New subscriptions and one-time “demand” trips may be provided on a case-by-case/space-available basis, only when specific outside funding is allocated to cover the cost of these trips, and providing the additional trip will not degrade service operations within the Mandated and Board-Adopted Service Areas.

**ADA Mandated & Premium Paratransit Service criteria:**

Per Federal regulations, all the following conditions apply to ADA service within the Mandated Service Area, generally without exception. For trips originating or ending in the Board-Adopted and Extended Service Areas, however, these conditions do not apply. They may still have some utility as guidelines to best practice but are not legal requirements. The following sections examine the implications of the three-tiered service area model on an attribute-by-attribute basis.

- *Capacity constraints* – Within  $\frac{3}{4}$  of a mile of fixed route service, during the days and hours that fixed route is in operation, ADA paratransit must generally be provided free of “capacity constraints.” This means that no limit can be placed on the number of trips provided to an eligible County Connection LINK rider, and that “any operational pattern or practice that significantly limits the availability of service” is prohibited. However, no such requirement applies to premium paratransit service – specifically including service provided outside of fixed route service hours or more than  $\frac{3}{4}$  of a mile from fixed route service.
- *Pickup time negotiation* – Within the Mandated Service Area, the scheduled pickup time for a given County Connection LINK trip may be negotiated (by the reservationist) within a two-hour window: up to one hour before or after the pickup time requested by the rider. An important exception to this rule is in cases where the rider is unable to leave substantially before their requested pickup time – for example, a rider’s trip home from work cannot begin before the end of the rider’s shift. In instances where the rider’s schedule does not allow them to leave before their requested pickup time, the trip schedule may be negotiated within the hour following the requested time.

Within the Board-Adopted Service Area, scheduled pickup times will be negotiated within the same two-hour window as trips within the Mandated Service Area. If future changes in funding, service demand, or other operational factors affect service quality within the Mandated Service Area, the pickup negotiation window for trips within the Board-Adopted Service Area may be Board-Adopted beyond two hours.

Within the Extended Service Area, standing orders for County Connection LINK service established as of the effective date of this policy will continue to be provided and new subscriptions or demand trips may be provided on a case-by-case basis, only if specific funding to cover the cost of the trip has been allocated and if providing the trip will not impact service quality within the Mandated or Board-Adopted Service Areas.

- *Trip duration* – The duration of a County Connection LINK trip with its origin and destination inside of the Mandated Service Area should not exceed the duration of the “most similar” trip, taken on County Connection fixed route service, including walking/wheeling time to and from the bus stop, wait time for the next scheduled bus, and transfer time between bus routes. Most similar trip times can be determined by using standard online trip planning tools such as Google maps.

Because the Board-Adopted and Extended Service Areas are outside of the assumed “walk-shed” for County Connection’s fixed bus routes, there is no comparable or most similar fixed route option for trips beginning or ending within these premium service areas.

- Within the Board-Adopted Service Area, County Connection LINK will make diligent efforts to provide trips within a reasonable duration, including the most relevant Mandated fixed-route travel time plus appropriate travel time outside of the Mandated Service Area.
  - For trips beginning or ending within the Extended Service Area, efforts will be made to ensure that County Connection LINK travel times are reasonable when compared against public transit times generally, however actual times will vary depending on specific circumstances at the time of the specific trip, including the demand for other County Connection LINK trips at the same time.
- *Maximum Fare* - For trips that begin and end within the Mandated Service Area, the fare for a County Connection LINK trip can be no more than twice the undiscounted adult (cash) fare for the most similar trip taken on County Connection’s fixed-route bus network. As of February 2026, the undiscounted local adult fare on County Connection’s fixed-route buses is \$2.50 and the one-way fare for County Connection LINK trips is \$5.00.

County Connection LINK trips beginning or ending within the Board-Adopted and/or Extended Service Areas are currently charged the same fare as for trips within the Mandated Service Area. However, as these are premium trips, the Federal limit of no more than twice the fixed route fare does not apply, and the Board would be within their rights to charge a fare higher than the standard \$5.00.

- *No limitation or prioritization based on trip purpose* – LINK paratransit service will be provided without regard to trip purpose (including service prioritization) for trips with their origins and destinations in the Mandated Service Area.

Trips beginning or ending in the Board-Adopted Service Area will also be provided without regard to trip purpose, resources permitting. If a change in funding or operating circumstances requires that County Connection LINK limit or prioritize Board-Adopted trips:

- trips to life-sustaining medical appointments such as dialysis or chemotherapy treatment will be given highest priority, followed by

- trips to routine and follow-up medical appointments, pharmacies, nutrition resources such as grocery stores or food banks, and social service day programs, followed by
- discretionary and social trips.

Trips beginning or ending more than 1½ miles from the nearest operating County Connection route will be prioritized by purpose, and riders will be limited to one round-trip per day with an origin or destination in the Extended Service Area.

- *Next-day scheduling* – LINK paratransit trips originating and ending within the Mandated Service Area ¾ of a mile or less from the nearest operating County Connection route are provided on a true next-day basis, meaning that a trip requested at the close of business for service very early the following morning, will be accommodated.

Resources permitting, Board-Adopted trips will be scheduled on the same next-day basis as Mandated trips. If future circumstances require that service availability be limited in the Board-Adopted Service Area, reservations may be required between 24 hours and two days in advance.

Resources permitting, trips beginning or ending in the Extended Service Area will be accommodated next day if space is available. If providing the trip requires the deployment of an additional vehicle or driver, up to three days may be required.

**Financial Implications:**

To be determined based on feedback.

**Recommendation:**

The Administration and Finance Committee and Staff recommend that the Board adopt Resolution 2026-22, included as Attachment E.

**Action Requested:**

Staff respectfully requests that the Board adopt the attached Resolution.

**Attachments:**

Attachment A: County Connection LINK **Weekday** ¾ & 1½ Mile Service Area Boundaries

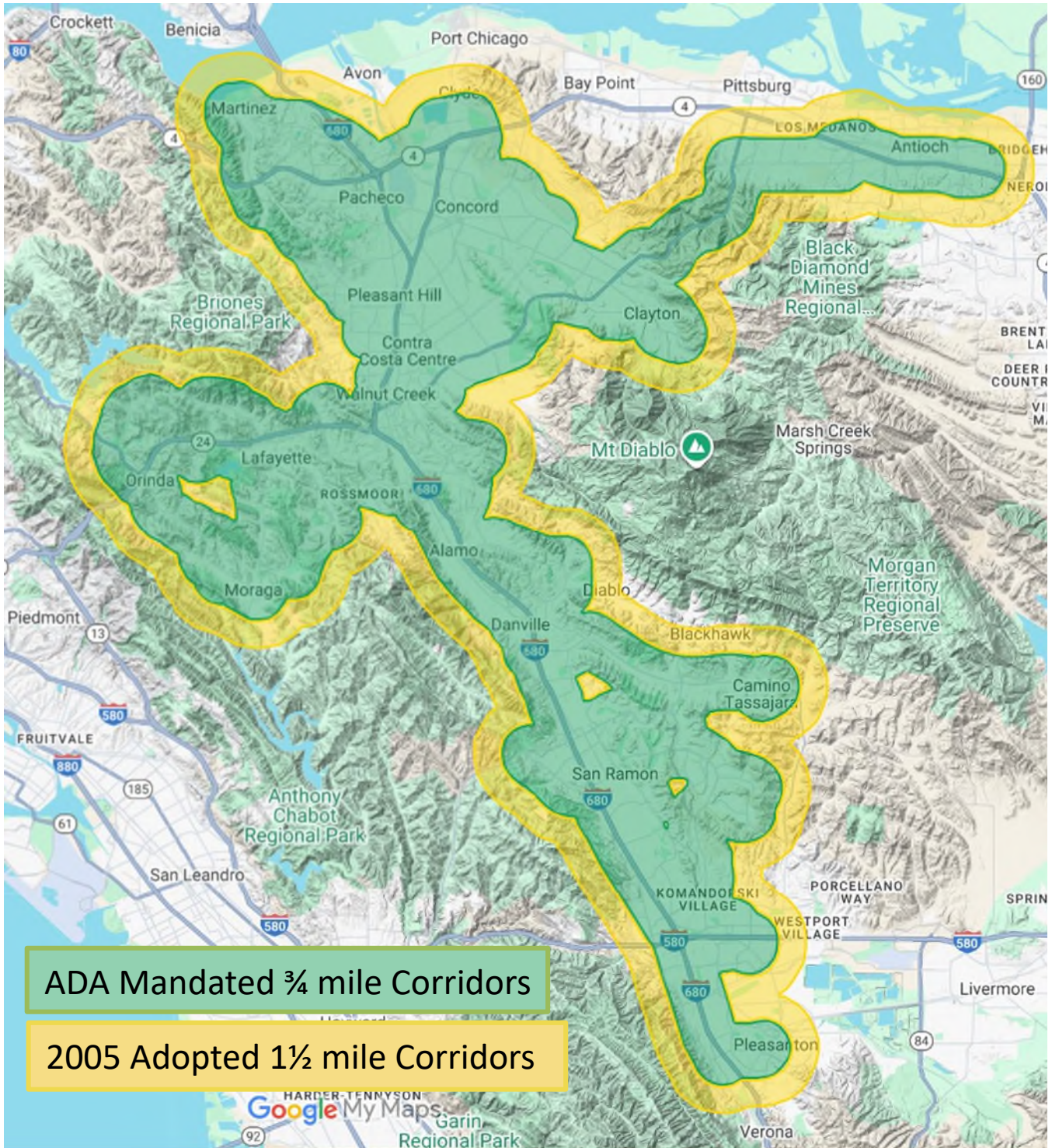
Attachment B: County Connection LINK **Weekend** ¾ & 1½ Mile Service Area Boundaries

Attachment C: Proposed County Connection LINK **Weekday** Three-Tiered Service Area

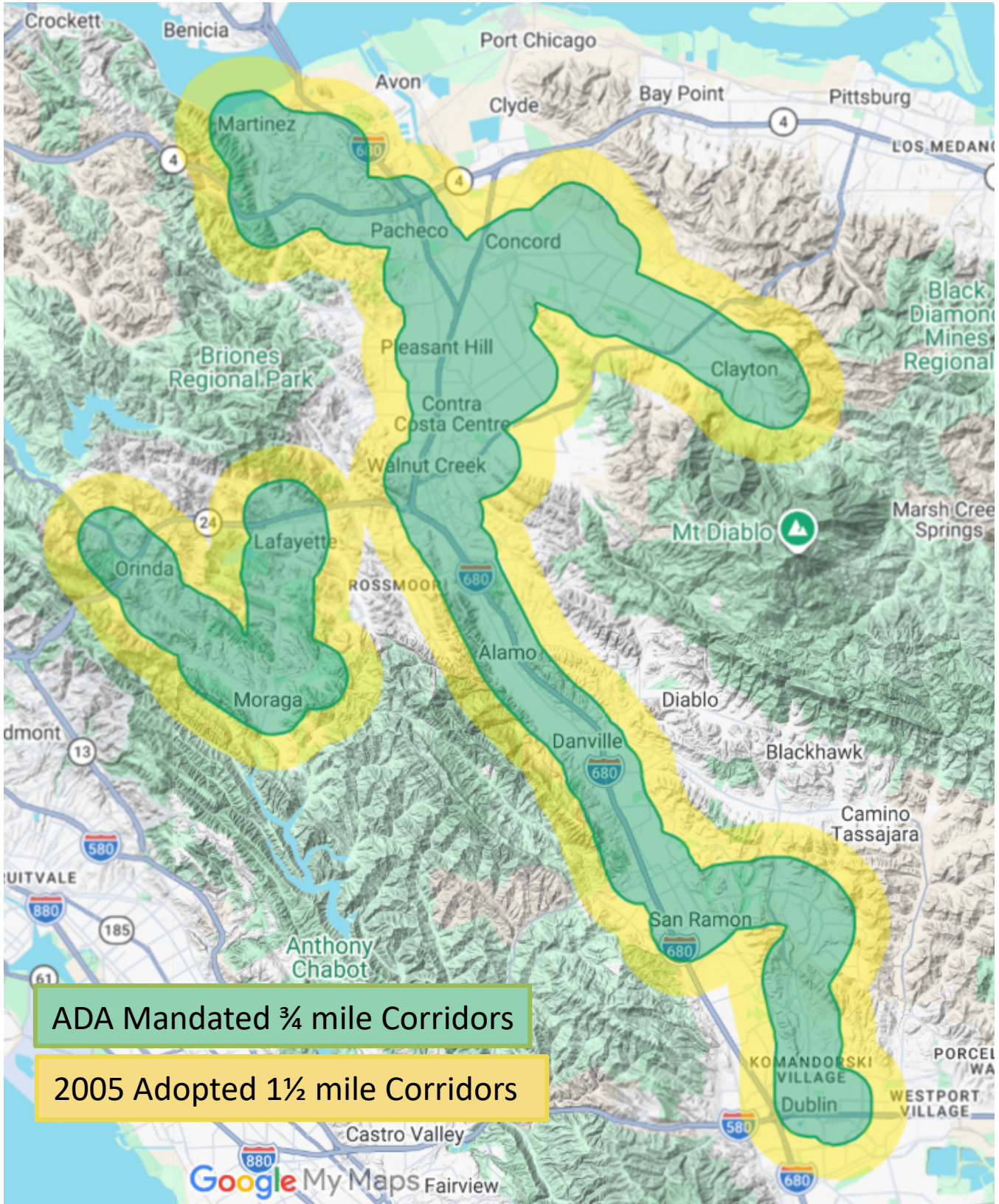
Attachment D: Proposed County Connection LINK **Weekend** Three-Tiered Service Area

Attachment E: Resolution No. 2026-22

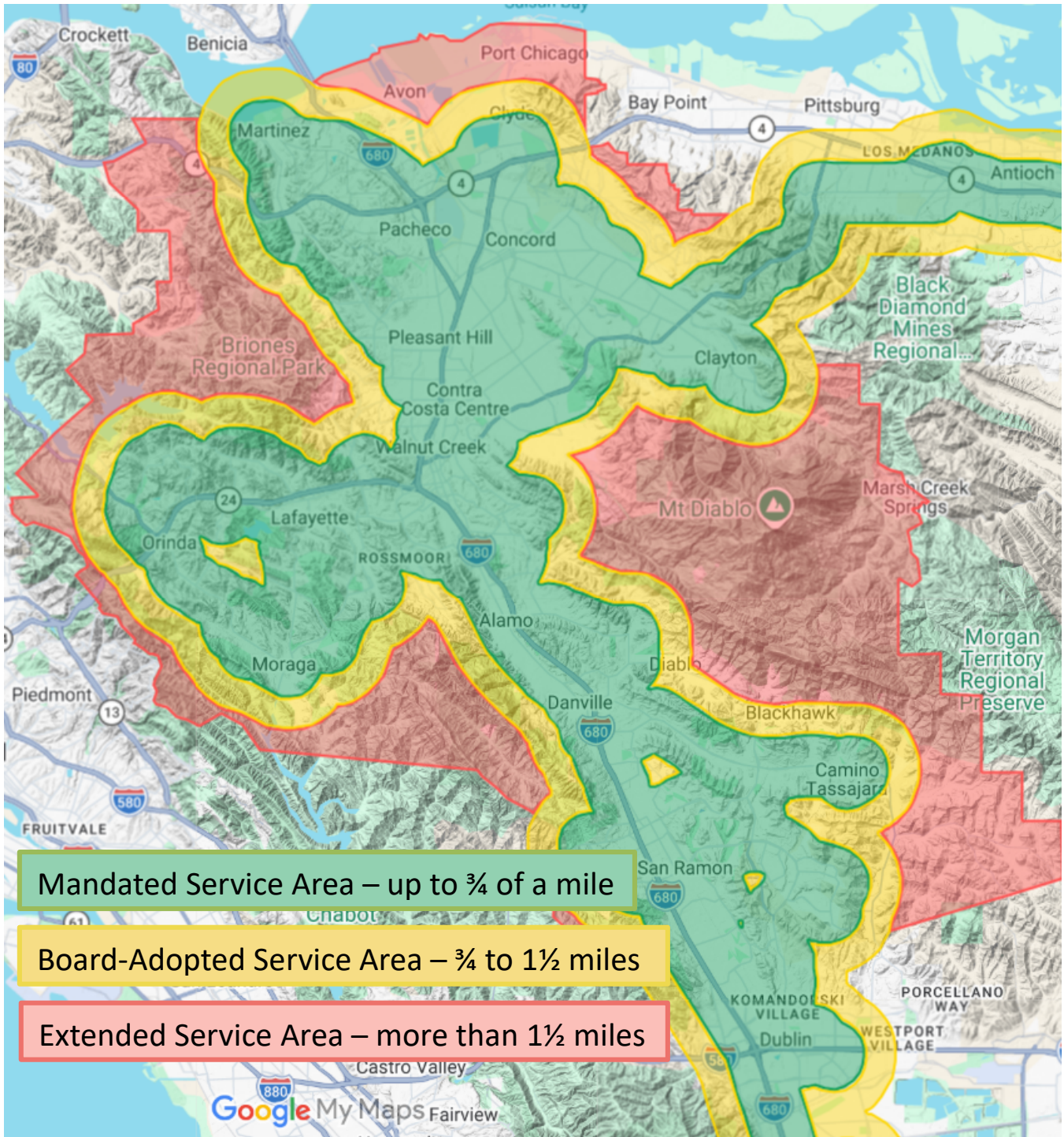
**Attachment A: County Connection LINK Weekday ¾ & 1½ Mile Service Area Boundaries**



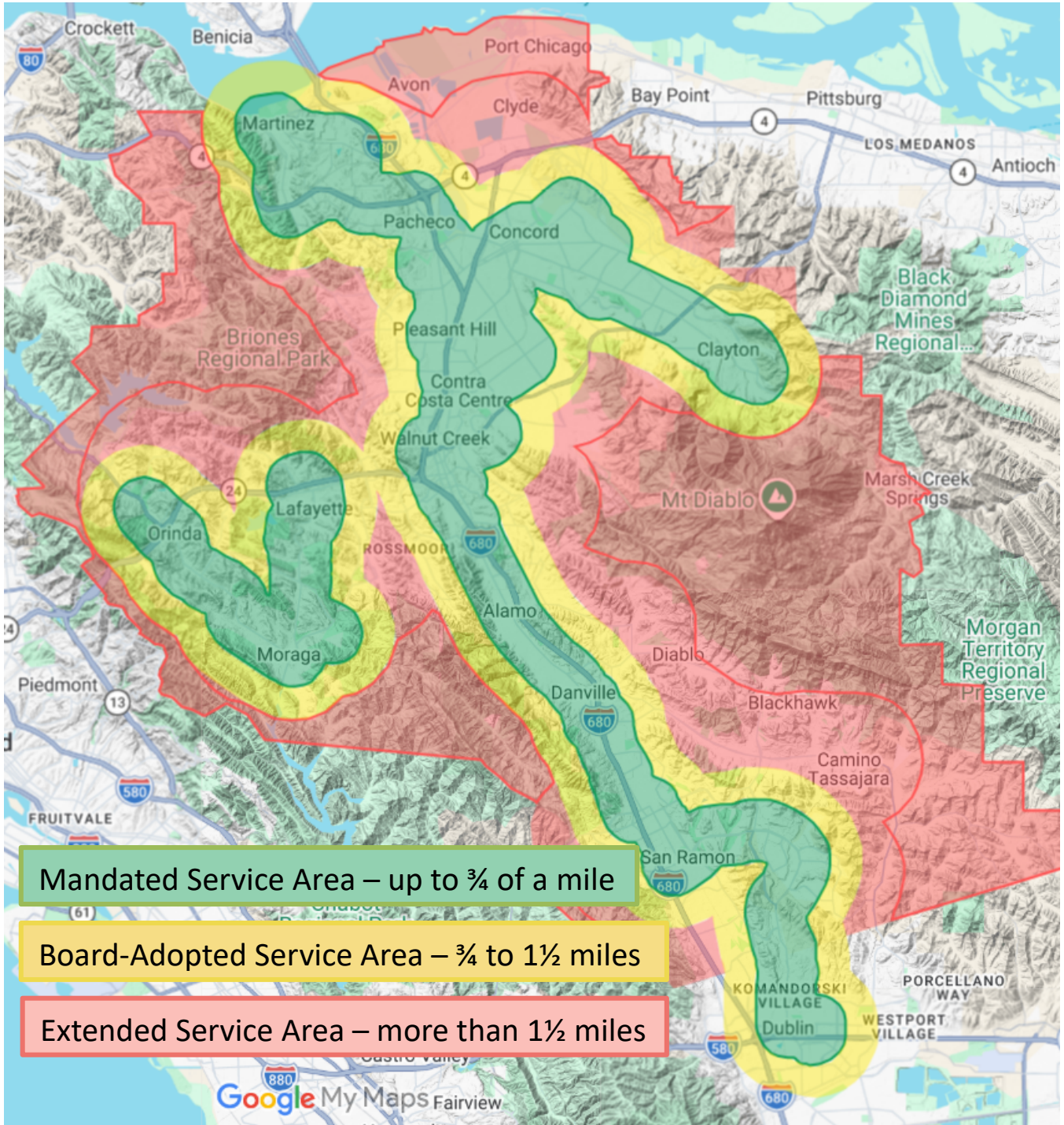
**Attachment B: County Connection LINK Weekend ¾ & 1½ Mile Service Area Boundaries**



**Attachment C: Proposed County Connection LINK Weekday Three-Tiered Service Area**



**Attachment D: Proposed County Connection LINK Weekend Three-Tiered Service Area**



**RESOLUTION NO. 2026-22**

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

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**ADOPTING THREE-TIERED LINK PARATRANSIT SERVICE AREA POLICY**

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 certain unincorporated portions of Contra Costa County; and

WHEREAS, LINK is the complementary paratransit service required by the Americans with Disabilities Act ("ADA") Regulations (49 CFR Part 37) that provides transportation for those persons who, because of their disability, are unable to use the County Connection fixed route service; and

WHEREAS, the ADA Regulations require transit agencies to provide complementary paratransit services to eligible passengers with origins and destinations within corridors with a width of three-fourths of a mile on each side of each fixed route ("Mandated Service Area"); and

WHEREAS, in 2005 by Resolution 2006-022, the CCCTA Board of Directors established a LINK paratransit service area within corridors with a width of one- and one-half miles on each side of each fixed route, as permitted under 49 CFR §37.131(a)(1)(iii) ("Board-Adopted Service Area"); and

WHEREAS, in response to various community needs, particularly since the start of the COVID-19 pandemic, County Connection LINK service has also been provided on a limited basis beyond the Board-Adopted Service Area ("Extended Service Area"); and

WHEREAS, the ADA Regulations and Federal Transit Administration guidance permit transit operators to provide premium paratransit service, which is service beyond three-fourths of a mile on each side of each fixed route, provided that service within the Mandated Service Area is not compromised; and

WHEREAS, a service area policy update is needed to guide future County Connection LINK program development, public communication and operational planning and practices, and to ensure that County Connection LINK service within the Mandated Service Area continues to meet- FTA requirements regardless of future funding or operational circumstances; and

WHEREAS, the CCCTA Board of Directors desires the LINK service area to more closely align with the core requirements of the ADA; and

WHEREAS, staff proposed a three-tiered service area model that delineates between the Mandated Service Area, Board-Adopted Service Area, and Extended Service Area.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Central Contra Costa Transit Authority hereby adopts a three-tiered paratransit service area policy that establishes the Mandated Service Area, Board-Adopted Service Area, and Extended Service Area, effective July 1, 2026.

Regularly passed and adopted this 19th day of March, 2026 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

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Robert Storer, Chair, Board of Directors

ATTEST:

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Lathina Hill, Clerk to the Board