



Alameda-Contra Costa Transit District

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## STAFF REPORT

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TO: AC Transit Board of Directors  
FROM: Michael A. Hursh, General Manager  
SUBJECT: Line 275/Flex Service Public Hearing

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### ACTION ITEM

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#### RECOMMENDED ACTION(S):

Consider the following actions associated with elimination of Line 275 and continuation of Flex service in Newark and Castro Valley:

1. Receive public comment; and
2. Adopt Resolution 17-047 approving the elimination of Line 275 and continuation of Flex service in Newark and Castro Valley, approving the related Title VI service equity analysis, and authorizing the filing of a Notice of Exemption.

#### BACKGROUND/RATIONALE:

On November 8<sup>th</sup>, 2017, staff requested the Board set a Public Hearing date for the proposed permanent elimination of Line 275 and continuation of Flex Service in Newark and Castro Valley. The proposed service change is based on a set of guiding principles that aim to improve transit service in Newark and Castro Valley, respond to growing customer demand for on-demand transportation services, and support equity and access for all AC Transit customers. Flex service allows customers to book fully accessible trips on-demand using any internet-enabled mobile or desktop device, the District's customer service call center, or in person at scheduled departure times at Union City and Castro Valley BART. The service has proven to be a viable option for low-density, low-demand areas, and a suitable mitigation for the elimination of Line 275, which at the time of suspension was the least performing route in the District.

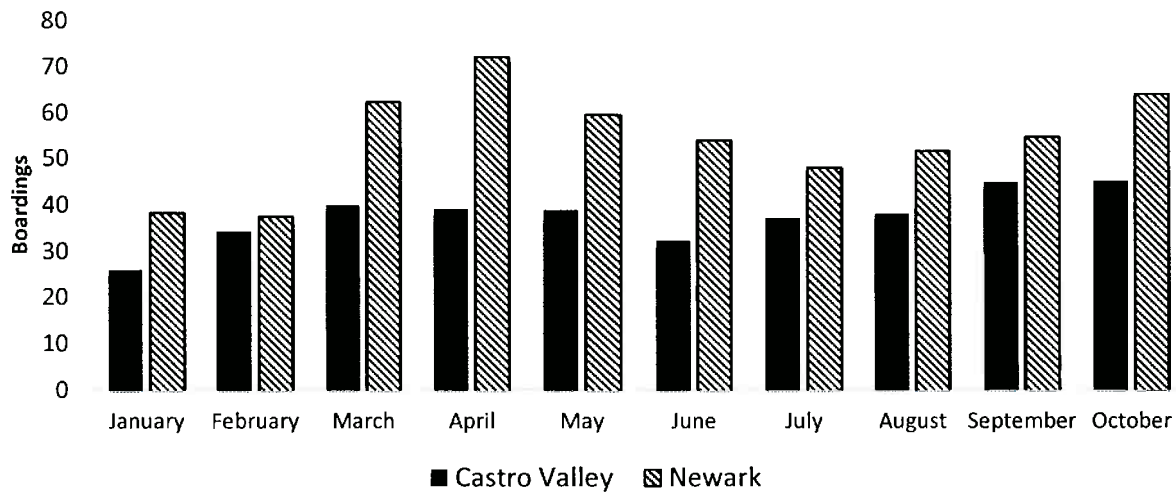
Based on the analysis of ridership and performance trends discussed in SR 14-247a and below, staff requests the Board adopt Resolution 17-047, approving the permanent elimination of Line 275 and continuation of Flex service in Newark and Castro Valley. The innovative Flex service pilot has generated significant attention and interest from the riding public, media, elected officials, and peer agencies, and its continuation will allow staff to finalize and implement a service plan leading to higher frequencies on major corridors in Fremont and Newark while improving coverage at all bus stops currently served by hourly or half-hourly routes in the South County service area.

#### *Total Ridership*

To date, there have been over 25,000 passenger trips taken on Flex, over 600 unique riders have tried the service, and more than 70% of customers have returned after taking their first trip.

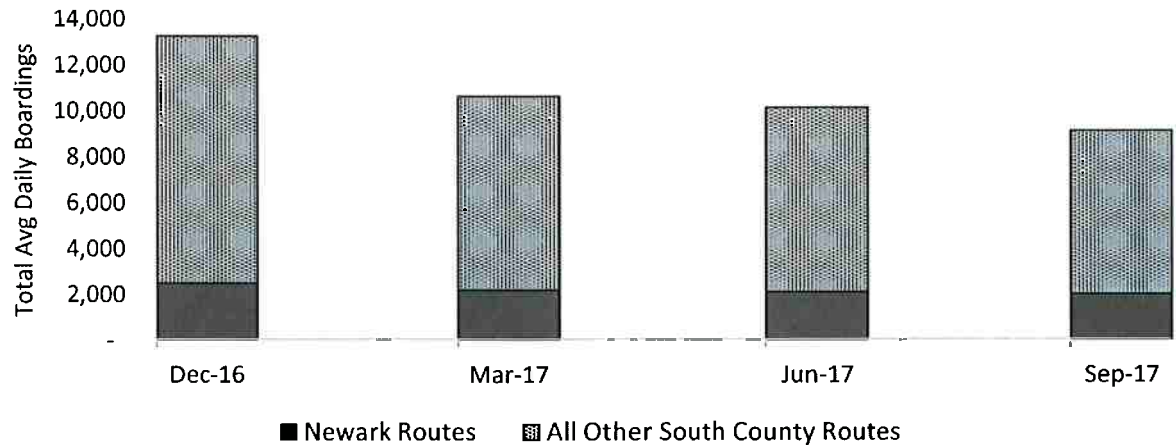
Average daily ridership on Flex in the Newark area increased substantially after the elimination of Line 275 in April (before dipping over the summer due to school recess). Ridership in Castro Valley is currently at its highest levels since the start of the program.

Figure 1: AC Transit Flex Average Daily Ridership



While the Newark Flex service did not fully capture the previous ridership of Line 275, the ridership numbers indicate that about a third of Line 275 customers have switched to Flex, 50% switched to other routes in the area, and there was a 20% decline in ridership overall in the Newark area. The ridership decline in Newark, however, was less than the decline in South County as a whole, meaning service in Newark outperformed South County even with the elimination of Line 275 and introduction of Newark Flex. Even though it operated alongside existing service, Castro Valley Flex had higher utilization than that in Newark, indicating latent demand for transit service in Castro Valley.

Figure 2: Average Daily Ridership by Quarter



### *Operational Performance*

Service reliability is frequently cited as a primary concern among AC Transit customers. On this measure, Flex consistently outperformed Line 275 and other comparative fixed routes during the pilot period. On-time performance for Newark Flex ranged from 75% to 87%, with an average of 82%, while on-time performance in Castro Valley ranged from 81% to 91%, with an average of 87%. Both are significantly higher than the average on-time performance of 60% for Line 275, as well as the District-wide target of 72%.

The real-time driving instructions and dynamically routed service facilitate improved on-time performance results. Customers also have the ability to track their vehicle in real-time, and receive automatic alerts if there is a delay, both of which improve passenger experience and perception of on-time performance.

### *Passenger Trip Characteristics*

An analysis of ridership trends on Newark Flex suggests the service is functioning as a peak period first mile/last mile connection to BART; is supporting bi-directional demand for both commuters with home origins in Newark and those with work destinations in the zone; and is serving a high proportion of school-related trips:

- 68% of trips occur during the peak periods of 6am – 9am and 3pm – 7pm
- 77% of trips begin or end at BART
- 17% of trips are school related
- The average trip length is 4.6 miles and 17 minutes in duration

By contrast, the Castro Valley Flex service is generally more neighborhood focused:

- Ridership is steadier throughout the day, with 51% of trips occurring during peak periods
- 69% of trips begin or end at BART
- 26% of trips are school related
- The average trip length is 1.8 miles and 11 minutes in duration

Both zones have generated new ridership by creating trip connections that were not possible previously. In Newark, Flex has connected Union City BART and the Fremont ACE Train Station to employment areas in the Ardenwood and Thornton Avenue industrial areas. In Castro Valley, the Flex service has created crosstown connections and generated ridership to reopened stops by the Kenneth Aitken Senior Center.

### Equity and Accessibility

A commitment to equity and accessibility has undergirded the District's approach to the Flex pilot since inception. A growing number of transit agencies around the country are currently implementing pilot programs that incentivize their customers to take Uber or Lyft. While these programs can expand access for some, they can also leave the unbanked or disabled with unequal transit options, while shifting transit labor to the so-called "Gig" economy. On AC Transit Flex, by contrast, all vehicles are wheelchair accessible and all are equipped with standard fare boxes, providing options for the unbanked. For those without ready access to

smart phones or the internet, reservations can be made by phone and fares are the same as a local bus. In addition, Flex operators are properly compensated with livable wages and benefits as opposed to ride-sharing drivers.

#### Summary of outreach process

In advance of the December 13<sup>th</sup> Public Hearing, staff hosted a community meeting at the Kenneth Aitken Senior Center in Castro Valley and a pop-up event at the Newark Flex terminus at Union City BART. Staff also distributed brochures and electronic materials, posted information on buses, and advertised the community meetings and the Public Hearing in local publications to solicit formal public comments in order to facilitate the Board's decision.

Staff also conducted the following specific outreach tactics during the pilot year:

- Direct mail to 22,000 Fremont, Newark, and Castro Valley area residences and businesses
- Brochures, flyers, seat drops and car cards
- Ads at Union City BART Station with a circulation of 3,784,368
- Bus exterior ads with estimated views of 550,000
- Bus shelter ads with 550,000 impressions
- Digital media advertising with 500,000 guaranteed impressions
- Website, including new carousel image, social media and eNews
- Use of bi-lingual brand ambassadors at Union City BART Station and on Line 275 buses to promote Flex and help passengers register for the service
- At-stop signage, including pole case inserts and Flex service signs.

#### CEQA Analysis – General Rule Exemption

Based on the nature of the service change staff has determined that the proposal falls under a “general rule” exemption (CEQA guidelines Section 15061(b)(3)). A general rule exemption applies to projects that do not fit within a statutory or categorical exemption, but where it can be clearly demonstrated that the project has no potential to have significant environmental effects. As the project would involve relatively minor changes to bus schedules, routes and equipment that are intended to increase the efficiency of the overall AC Transit system, no significant effects would result. If approved, staff will file the Notice of Exemption (NOE), attachment 5, with the Alameda County clerk.

#### Title VI

According to Board Policy, staff must conduct a Title VI service equity analysis whenever there is a significant change to service provision, including a new transit route or a change of 25 percent or more of the number of revenue hours or miles of a route. Establishment of Flex services in Newark and in Castro Valley and elimination of Line 275 meet these qualifications, and staff conducted an analysis to assess how each proposal would affect different rider populations. The analysis, Attachment 3, found that the proposed changes would not result in disparate impacts on people of color or disproportionate burdens on low income populations. The Title VI process additionally requires staff to inform the Board of Directors about what public engagement was carried out to publicize the proposed service changes and to inform the

public about their ability to provide comment for the Public Hearing process; a summary of these activities is contained in attachment 3. Finally, Board Policy requires the Board of Directors approve the Title VI service equity analysis.

#### Implementation Plan and Next Steps

Should the Board decide to continue Flex service, staff has developed a cost-neutral service plan for the South County service area that would implement high-frequency service on all major corridors in Fremont and Newark and provide Flex service to all other bus stops where hourly or half-hourly service is currently provided. Staff presented a draft of this plan to the public at each of the three public outreach rounds that accompanied development of the AC Go Service Expansion Plan. At the conclusion of the Flex pilot, staff will develop an outreach plan to bring this service plan to the public and the Board for approval and implementation by March 2019. Staff will also bring periodic updates on Flex service performance as this plan is being developed to ensure the service is still meeting goals of efficiency, effectiveness, and equity.

- **March 2018** – Implement Board recommendations for elimination of Line 275 and continuation of Flex in Newark and Castro Valley
- **Spring and Summer 2018** – Conduct public outreach on South County service plan
- **Fall 2018** – Conduct public hearing for South County service plan
- **Spring 2019** – Implement South County service plan during March sign-up

#### BUDGETARY/FISCAL IMPACT:

The permanent elimination of Line 275 and continuation of Flex service is cost-neutral in Newark and adds the permanent cost of the service in Castro Valley. The Newark Flex pilot has operated cost-neutral given that two buses operating on Line 275 have been replaced with two buses operating on Newark Flex with the same weekday span and revenue hours. The Castro Valley pilot costs an additional permanent bus because it operates on top of existing service. The District is currently funding the additional bus for the Castro Valley Flex at an annual cost of \$786,000; however, this cost will be absorbed by the Central County service changes planned to be implemented in March 2018.

In both cases, the additional cost of the tablet computers and hardware, as well as the software and support provided by the vendor, DemandTrans, has been offset by the lower operation and maintenance costs of the 24-foot cutaways operating on Flex compared to the 30-foot diesel buses previously operating on Line 275. Even attributing the full cost of the technology component to the Newark Service area, a cost which is shared with Castro Valley, the Flex Service is still less costly to operate than Line 275. This is driven by the 75% lower O&M cost per mile of the cutaway vehicle and the fact that Flex operates 30% fewer miles than the fixed-route alternative.

*Table 1: Comparison of Vehicle Operation and Maintenance (O&M) Costs*

Route	Daily Miles	O&M Cost per Mile	Annual O&M	Annual Tech. Cost	Total O&M
Line 275	388	\$1.31	\$128,087	-	\$128,087
Newark Flex	271	\$0.98	\$66,926	\$60,000	\$126,926

Operator pay has been higher during the pilot year due to a Memorandum of Understanding between the District and ATU that allowed operators to volunteer to sign the Flex service based on seniority outside of the normal sign-up process. The agreement provides that the District pay the operator's signed run pay, which is higher than the straight run pay of Flex. This allowed the District to train a select group of veteran operators during the pilot year. Should Flex continue beyond the pilot period, operators will bid on the service through the normal sign-up process.

#### **ADVANTAGES/DISADVANTAGES:**

The permanent elimination of Line 275 and continuation of Flex service would allow the District to place Flex routes in the regular operator bid and route training process. This would facilitate the expansion of Flex service into other areas, which could allow the District to implement a service network based on high-frequency major corridor routes and Flex coverage routes. Service on major corridors such as Fremont Boulevard, Decoto Road, Mowry Ave, and Newark Boulevard would be brought to 15-minute frequencies while Flex routes would cover all bus stops currently served by hourly and half-hourly routes. At the conclusion of the Flex pilot year, should the Board decide to continue Flex service, staff will develop an outreach plan to bring this service concept to the public and the Board for approval and implementation by March 2019.

As discussed previously (Staff Report 17-128), the principal advantage of Flex is that it allows the District to serve customer demand where it is in time and place. For example, rather than running the 275 on the same fixed route every 45 minutes, Newark Flex departs every 30 minutes from Union City BART to serve customers' exact trip requests (Castro Valley Flex provides departures every hour from Castro Valley BART using just one bus). For the District, this means the Flex vehicles, which already have lower maintenance costs than standard buses, drive fewer miles and can be operated more frequently from BART. For customers, besides more frequent BART departures, Flex service means shorter travel times due to more direct routing and the ability to schedule trips on demand or when convenient, which equates to shorter wait times.

This advantage can be a disadvantage if the need to schedule a pickup becomes a barrier to using the service. Customers accustomed to walking to the nearest bus stop to board Line 275 may find scheduling a pick-up beforehand cumbersome. This may explain why equal numbers of Line 275 customers appear to have shifted to Flex or to other fixed routes in the area, such as Lines 99, 200, and 232. Staff has worked to lessen the scheduling barrier by ensuring customers have the option to book trips online or by phone, and has posted a step-by-step guide to using the service online, on the bus, and at key bus stops. Staff will continue rider education efforts as long as the service operates to ensure all who wish to use it can do so conveniently.

An additional advantage of Flex service is it provides a more robust dataset for planning purposes. Because the scheduling software records the origin and destination of each trip – instead of simply the boarding and alighting counts at each stop like on regular buses – staff can plan service based on trip level data rather than stop level data. The software also records



travel time continuously, meaning travel time estimates can be updated constantly, leading to improved on-time performance.

Finally, the service has generated positive attention for the District in the community, the press, from elected officials, and from numerous transit agencies around the country. External Affairs staff has met with local, state, and federal elected officials to discuss the service, many of whom display Flex materials in their offices or promote the service via social media. Staff has also been invited to present at numerous conferences, including a Transportation for America conference in Washington, D.C., the Transportation Research Board's Automated Vehicle Symposium in San Francisco, and the Self-Help Counties Coalition's Focus on the Future 2017 conference.

### **ALTERNATIVES ANALYSIS:**

Staff evaluated several possible alternatives to the proposed action. Those alternatives – and the justification for why they are not recommended – are discussed below:

- Staff considered the elimination of both Line 275 and Flex service. This would save District around \$1.4 million annually, but leave customers in Newark and Castro Valley without service. Castro Valley in particular would lose coverage to some areas with the suspension of Flex due to Board approved route changes passed as part of AC Go.
- Staff also considered reinstating Line 275 and suspending Flex. This would also be a cost-neutral option and would return service to its previous state. The existing network would remain a collection of infrequent routes with limited “show and go” or transfer opportunities. Existing customers could maintain their travel patterns but there would be limited opportunity to attract new riders. For this reason, staff believes the network concept described above represents the best opportunity for the District to maintain service for all existing customers while strategically increasing frequency in areas likely to attract new customers.
- Staff acknowledges the Board can come to different decisions with regard to the Newark Flex service and the Castro Valley Flex service.

### **PRIOR RELEVANT BOARD ACTION/POLICIES:**

**14-247a** – Flex Service Public Hearing Report

**17-128** – AC Transit Flex Service Update

**14-247** – Line 275 Flex Service Pilot

**13-253** – Mobility Management and Technology Task Force

**Board Policy 110** - Public Hearing Process for Board of Directors

**Board Policy 518** - Title VI Environmental Justice Service Review and Compliance Report Policy

**Board Policy 525** – Environmental Evaluations of Transit District Projects

### **ATTACHMENTS:**

1. Resolution No. 17-047
2. Summary of Public Comments Received (submitted to the Board prior to 12/13)
3. Title VI Analysis and List of Outreach Meetings and Events
4. Public Hearing Notice

5. Notice of Exemption (NOE)

**Approved by:** Ramakrishna Pochiraju, Executive Director of Planning and Engineering  
**Reviewed by:** Robert del Rosario, Director of Service Development and Planning  
Denise Standridge, General Counsel  
Claudia Allen, Chief Financial Officer  
**Prepared by:** John Urgo, Transportation Planner, Service Planning  
Michael Eshleman, Manager, Service Planning



**ALAMEDA-CONTRA COSTA TRANSIT DISTRICT  
RESOLUTION NO. 17-047**

**A RESOLUTION APPROVING THE ELIMINATION OF LINE 275, THE CONTINUATION OF FLEX  
SERVICE IN NEWARK AND CASTRO VALLEY, THE TITLE VI SERVICE EQUITY ANALYSIS, AND  
AUTHORIZING THE FILING OF A NOTICE OF EXEMPTION**

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**WHEREAS**, the Alameda-Contra Costa Transit District (District or AC Transit) Service Development and Planning Department developed a demand responsive service product branded AC Transit Flex, which allows customers to schedule accessible trips on-demand using mobile or desktop devices, the District's customer service call center, or in person at select BART stations, as more particularly identified in Staff Report 14-247b; and

**WHEREAS**, on November 8, 2017, the District's Board of Directors set a public hearing on the proposal to eliminate Line 275 and continue Flex service in Newark and Castro Valley (collectively the Project) at its scheduled meeting in Oakland on December 13, 2017 at 5:00 p.m.; and

**WHEREAS**, notices of this public hearing were published in accordance with Board Policy No. 110; posted on the District's website and on car cards in District buses; and

**WHEREAS**, at the public hearing the Board received oral and written comments from individuals on the Project; and

**WHEREAS**, the District retained Rincon Consultants, Inc. to evaluate the environmental impacts of the Project under the provisions of the CEQA and Board Policy No. 512 (Environmental Evaluations of Transit District Projects); and

**WHEREAS**, Rincon's analysis, with staff's concurrence, concluded the Project falls under a general rule exemption (CEQA guidelines Section 15061(b)(3)) and as such would have no significant impact on the environment; and

**WHEREAS**, on November 30, 2017, a Notice of Public Hearing was printed in the following newspapers in the Project area - the Oakland Tribune, El Mundo (in Spanish), Sing Tao Daily (in Chinese), the Fremont Argus, Hayward Daily Review, and the West County Times; and

**WHEREAS**, at its December 13, 2017 meeting, the Board received the Title VI analysis prepared pursuant to Board Policy 551 (Title VI Service Review and Compliance Report Policy) which concluded that the Project would not have a disproportionately high and adverse impact on minority or low-income communities in the Project area; and

**WHEREAS**, the Board of Directors met on this 13<sup>th</sup> day of December, 2017, at the AC Transit General Office, 1600 Franklin Street, Oakland, California and held public hearings on the Project; and

**WHEREAS**, the oral and written comments received from the public on the Project during the open comment period from November 8, 2017 to December 13, 2017 have been compiled, all of which shall constitute part of the public record; and

**WHEREAS**, the Board of Directors were provided with copies of the aforementioned public comments received prior to the public hearing and considered those comments, as well as comments received at the public hearing, together with the comments of staff and the content of the staff reports prepared on the Project prior to making its decision.

**NOW THEREFORE**, the Board of Directors of the Alameda-Contra Costa Transit District does resolve as follows:

**Section 1.** Approves the Title VI Service Equity Analysis as presented in Staff Report 14-247b.

**Section 2.** Approves the elimination of Line 275.

**Section 3.** Approves the continuation of Flex service in Newark and Castro Valley.

**Section 4.** Authorizes staff to file a Notice of Exemption and any other documents necessary to carry out the actions taken under this resolution.

**Section 5.** This resolution shall become effective immediately upon its passage by four affirmative votes of the Board of Directors.

**PASSED AND ADOPTED** this 13th day of December 2017.

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Elsa Ortiz, President

Attest:

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Linda A. Nemeroff, District Secretary

I, Linda A. Nemeroff, District Secretary for the Alameda-Contra Costa Transit District, do hereby certify that the foregoing Resolution was passed and adopted at a regular meeting of the Board of Directors held on the 13th day of December, 2017 by the following roll call vote:

**AYES:**

**NOES:**

**ABSENT:**

**ABSTAIN:**

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Linda A. Nemeroff, District Secretary

Approved as to Form and Content:

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Denise C. Standridge, General Counsel

## **ATTACHMENT 2 PLACEHOLDER**

### **Staff Report 14-247b**

**Attachment 2 – Summary of Public Comments Submitted will be  
Distributed Prior to 12/13/17**

## TITLE VI SERVICE EQUITY ANALYSIS FOR LINE 275 AND FLEX SERVICE PROPOSALS

Board Policy 518 directs staff to conduct a Title VI service equity analysis whenever there is a significant change to service provision, including a new transit route or a change of 25 percent or more of the number of revenue hours or miles of a route. Establishment of Flex services in Newark and in Castro Valley and elimination of Line 275 meet these qualifications, and staff conducted an analysis to assess how each proposal would affect different rider populations. **The analysis, which follows, found that the proposed changes would not result in disparate impacts on people of color or disproportionate burdens on low income populations.** The Title VI process also requires staff to inform the Board of Directors about what public engagement was carried out to publicize the proposed service changes and to inform the public about their ability to provide comment for the Public Hearing process; a summary of these activities is contained below.

Staff took a look at each piece of the proposal: elimination of Line 275; new Newark Flex service; and new Castro Valley Flex service; to ensure there was no discriminatory impact on people of color or low-income populations.

### Methodology

Staff first looked at demographics in the specific areas affected by proposed changes and compared them to the AC Transit service area as a whole. Staff downloaded data from the Census Bureau (ACS 2011-2015 5YR estimates), drew a 1/4 mile buffer around the affected lines' bus stops, and analyzed the population within the Census Block Groups that intersected those buffers. The data showed that in the Line 275 service area and the Newark Flex area the population of color is greater than in the service area as a whole. In all three analysis areas, the population of low-income people is lower than in the service area as a whole.

	People of Color	Low-Income
AC Transit Service Area	71.31%	30.24%
Line 275	78.35%	20.05%
Newark Flex	77.93%	20.14%
Castro Valley Flex	54.94%	23.03%

Staff then looked more closely at the specific proposals.

### Newark

Fixed route 275 provides service from Newark, including the commercial district near Lido Faire and Rosemont Centers and Newark City Hall, continuing through Fremont on Thornton Avenue and Fremont Boulevard, near the Centerville Ace/AMTRAK station, and past American High School. The route ends at Union Square Marketplace and Union City BART.

The Newark Flex service encompasses all bus stops served by Line 275, plus some extras that were added in response to requests from riders and in the community, so it is accessible by a larger population than Line 275. Extra bus stops in the Ardenwood, Gateway Blvd, and Thornton Ave industrial/employment areas provide more access for residents, shoppers, and employees in the Newark area, and one new Flex stop provides access to the Fremont ACE train station. Despite having more stops, only one additional Census Block Group (with 2582 residents) falls within the analysis area around the Newark Flex bus stops.

Because Newark Flex is proposed as an alternative to the elimination of Line 275, staff compared access for people of color and low-income people across both routes. The analysis shows that a slightly smaller percentage of people of color have access to the Newark Flex service than they have to Line 275, but the difference (less than 3%) is well below the AC Transit Board Policy 518 threshold for finding a discriminatory effect.

	Existing Line 275	Proposed Newark Flex	Change	% Change
Total	74,024	76,606	+2,582	+3.48%
People of Color	57,996	59,701	+1,705	+2.94%
White not Latino	16,028	16,905	+877	+5.47%
			<b>Difference</b>	<b>- 2.53%</b>

Staff repeated the analysis for income status. The analysis shows that a slightly larger percentage of low-income people would have access to the Newark Flex service than they do for Line 275. This number (less than 1%) is also well below the Board Policy's threshold for finding a discriminatory effect.

	Existing Line 275	Proposed Newark Flex	Change	% Change
Low-Income	14,844	15,426	+582	+3.92%
Not Low-Income	59,180	61,180	+2,000	+3.38%
			<b>Difference</b>	<b>+ 0.54%</b>

Along with the data analyses, staff tried to understand whether a change from fixed route service to on-demand service would have a qualitative negative impact on Title VI-populations in the affected service area, since replacement of Line 275 with Flex would mean that a rider could not simply walk out to a bus stop and wait for the bus.

According to Board Policy 545, fixed-route service should be cost-effective. With only 7 passengers per revenue hour, Line 275 is one of the least cost-effective routes in the District, which potentially drains resources from other service which may benefit Title VI-protected riders more. This low productivity also puts Line 275 at risk for complete elimination, which has the potential to hurt all riders included those protected by Title VI. The Board Policy says service should also be user friendly; with a 45 minute headway, however, Line 275 does not make it easy for a rider to simply walk and wait for the bus.



As described in the report, staff took many steps to ensure that no rider would be left behind in a switch from fixed-route to on-demand service. Recognizing that low-income people own fewer smartphones and have less reliable access to data plans over the month, reservations for Flex can be made by phone, and riders who wish to go to locations in Newark from the Union City BART station can board there without advance reservations. Reservation agents have access to an over-the-phone interpretation service, so they can assist customers with limited English proficiency. The website reservation and notification software is available in Spanish and Chinese, and the Google Translate button has been installed on the website to provide basic translation for other languages.

As noted above, Newark Flex provides access to more bus stops in more neighborhoods. In addition, the service runs every 1/2 hour as compared to Line 275's every 45 minutes. The high on-time performance for the Newark Flex service results in shorter and more reliable wait times for a rider with a Flex reservation than a rider who's gone to a Line 275 stop based on the schedule. From the beginning of the pilot in March 2017, there have been almost no customer complaints related to the suspension of Line 275 or the introduction of Newark Flex service.

Staff believe that replacement of fixed-route Line 275 with Flex service would not unduly burden Title VI-protected populations, and the data inquiry shows that the difference in access to service by protected populations – in comparison with non-protected populations – does not carry a discriminatory effect. Therefore, this analysis finds that **the proposed changes would not result in disparate impacts on people of color or disproportionate burdens on low income populations.**

#### Castro Valley

Flex service operates in Castro Valley as an overlay to existing service. It covers an area north of the Castro Valley BART station roughly between Lake Chabot Road and Center Street. While much of it overlays streets where fixed-route Line 48 operates, it covers additional street segments, providing crosstown connections and providing bus access to stops near a senior center. Castro Valley Flex runs every 60 minutes, and while it is mostly a reservation-based system, riders can board without a reservation at Castro Valley BART.

No fixed route is proposed to be changed or eliminated if the Castro Valley Flex service is made permanent, so there is no simple way to compare effects of implementing the service for Title VI purposes. Staff analyzed how many more people in protected and non-protected classes would receive benefits of the new service to augment the Board's understanding of where resources are being spent.

	Proposed Castro Valley Flex	% of Total
Total	55,430	100.00
People of Color	30,456	54.94
White Not Latino	24,974	45.06
	<b>Difference</b>	<b>+ 9.88</b>

First, the analysis shows that people of color benefit more from the new service, that is, there are no adverse effects on people of color from implementing Castro Valley Flex, and so finds that **this proposed change would not result in disparate impacts on people of color.**

Because the percentage of low-income people in the Castro Valley Flex service area is lower relative to the AC Transit service area, they do not benefit as much from the new service as not low-income people.

	Proposed Castro Valley Flex	% of Total
Total	55,430	100.00
Low-Income	12,768	23.03
Not Low-Income	42,662	76.97
	<b>Difference</b>	<b>- 53.94</b>

In discussing how to measure discriminatory effects on low-income populations, AC Transit Board policy says “When the proportion of low-income populations or riders as a whole *adversely* affected by the proposals is 15% (or more) then the proportions of non-low-income populations or riders *adversely* affected, such changes will be considered to have a disproportionate burden” (emphasis added). Castro Valley Flex service is purely additive – no fixed-route service is proposed to be changed or eliminated because of it. While the residential population around Flex stops is less low-income than the AC Transit service area as whole, Flex provides service to the Kenneth Aitkin Community & Senior Center and additional service to the Eden Hospital and Medical Center – destinations for which lower-income people often rely on the bus for access. Such riders may live outside the Castro Valley Flex residential area, but AC Transit has long recognized the importance of providing service to destinations valued by Title VI-protected populations.

Because of these reasons, staff believe that implementation of the Castro Valley Flex service does not cause any adverse effects to be borne by low-income people, and so finds that **this proposed change would not result in disproportionate burdens on low income populations.**

#### Public Engagement

The Title VI process also requires staff to inform the Board of Directors about what public engagement was carried out to publicize the proposed service changes and to inform the public about their ability to provide comment for the Public Hearing process. The Public Participation Plan (PPP) element of the District’s Title VI program identifies effective methods of engaging with communities regardless of race, color, national origin, ability to speak English, or income status, as protected by Title VI of the Civil Rights Act and associated regulations. Staff followed PPP recommendations to guide public engagement activities for these proposals.

Materials were developed and distributed with an eye toward informing existing riders of Line 275 and potential new riders of the Flex service in both locations. These efforts included direct mail to

residences and businesses; brochures, flyers, seat drops, and ad/car cards; ads at BART stations; bus exterior and bus shelter ads; digital media advertising; and at-stop signage. Promotional buttons, tri-lingual cards, and tri-lingual Flex brochures were distributed through organizations in the area, and articles were published in two local newsletters.

The AC Transit digital media presence was updated regularly including information on the website, social media, and eNews. Curated digital posts were sent to the three school districts in the affected area (Fremont, Newark, and Castro Valley).

In order to ensure that all customers – including those with limited English proficiency (LEP) – were able to access information about the pilot programs and the service changes proposed for this Public Hearing, information was presented in English, Spanish, and Chinese, which are the three languages most spoken in the service area. All printed and website collateral was provided in the three languages, and ads were placed in media outlets targeting Spanish and Chinese constituents. Brand ambassadors speaking the three languages were employed at the Union City BART Station and on Line 275 buses to promote Flex and help passengers register for the service.

Beginning in February, 2016, staff brought information to the community and solicited opinions and feedback about the new Flex service and possible elimination of Line 275 through many events, including:

- four AC Transit-sponsored community meetings, 2 each in Newark and Castro Valley;
- presentations at 8 meetings of community organizations or government bodies;
- sponsorship/ads for two events; and
- tables at 14 community events.

Staff had a number of one-one-one or group meetings with local government and community leaders, school district officials, and staff from businesses located in the service area, and staff made a presentation about Flex at the AC Transit Board meeting that was held in Newark on October 25, 2017.

For the comment period leading up to the Board action, staff developed a tri-lingual car card, flyer, and “take-one.” Information was also posted on the website and sent out through eNews, and staff used social media to promote the meetings and the Public Hearing. Two community meetings were held – one each in Newark and Castro Valley. In person interpreters will be available at the Public Hearing, and were available on demand (with advance notice) for the community meetings.

A full detailed breakdown of the public engagement activities follows.

Marketing Activity	Location/target	Reach
Direct mail	Fremont/Newark area	11,000 residences and businesses
Brochures, flyers, seat drops, and car cards		
Ads	Union City BART Station	circulation of 3,784,368
Bus exterior ads		550,000 estimated views
Bus shelter ads		550,000 impressions

Digital media advertising		500,000 guaranteed impressions
Website with new carousel image		
Social media posts (Twitter and Facebook)		
eNews		
Bilingual brand ambassadors	Union City	BART Station, Line 275 buses
Signage, including pole case inserts and Flex service signs	At Bus Stops	
Tri-lingual ad cards		Coaches out of Division 6
Curated Flex digital posts	Fremont, Newark, Castro Valley	School districts
Promotional buttons, cards, and Flex brochures	Fremont, Newark, Castro Valley	Eden Medical Center, Newark City Hall and City Library, and American High School
eNews	Flex subscribers and current riders	28% open rate
Targeted eNews offering one free round-trip ride on Flex		Riders with missed Flex trip
Published Articles	Castro Valley, Newark	Readers of Castro Valley Forum & Newark Chamber of Commerce Newsletter
Direct Mail	Castro Valley	10,534 residences and businesses
<b>Legislative Affairs &amp; Community Relations</b>	<b>Activity</b>	<b>Location</b>
17-Feb-16	Presentation	Central County Marketing Group
17-Feb-16	Presentation	Tri-City Democratic Forum
10-Mar-16	Presentation	Castro Valley / Eden Area Chamber of Commerce
12-Apr-16	Presentation	Castro Valley Rotary Club
29-Apr-16	Table	United Seniors of Oakland and Alameda County's 25th Annual Convention
5-May-16	Table	10th Annual Senior Health & Wellness Resource Fair at the Kenneth C Aitken Senior Center
3-Jun-16	Table	Four Seasons of Health Expo
4-Aug-16	Community Meeting	AC Transit Flex Town Hall at Kenneth C. Aitken Senior & Community Center
15-Sep-16	Table	Healthy Living Festival
4-Oct-16	Table	Newark Senior Center Health Fair

17-Oct-16	Presentation	Castro Valley MAC General Purpose Meeting
20-Oct-16	Presentation	REACH Ashland Youth Center Town Hall
6-Dec-16	Community Meeting	Newark Flex Workshop
12-Jan-17	Table	Newark Gardens
17-Mar-17	Table	Fremont Kaiser Transit Fair
5-Apr-17	Community Meeting	Newark Flex Workshop
13-Apr-17	Ad/Sponsorship	Newark State of the City
22-Apr-17	Table	Let's Go Green Together – City of Fremont
4-May-17	Table	Aitken Senior Health Fair
26-May-17	Table	United Seniors of Oakland and Alameda County's 26th Annual Convention
30-May-17	Presentation	Newark Rotary Club
14-Aug-17	Table	Castro Valley High School
9-Sep-17	Table	Castro Valley Fall Festival
21-Sep-17	Table	Healthy Living Festival
29-Sep-17	Ad/Sponsorship	Tri-City Elder Coalition Rhinestone Rodeo
3-Oct-17	Table	Newark Senior Health Fair
25-Oct-17	Presentation	AC Transit Board meeting in Newark
8-Nov-17	Presentation	Alameda County Special Districts Association Meeting
5-Dec-17	Community Meeting	Newark Flex Community Mtg
6-Dec-17	Community Meeting	Castro Valley Flex Community Mtg



Alameda-Contra Costa Transit District

## **PUBLIC HEARING NOTICE Alameda-Contra Costa Transit District**

### **Elimination of Line 275 and Continuation of Flex Service**

Notice is hereby given that the AC Transit Board of Directors will hold a Public Hearing on **Wednesday, December 13, 2017 at 5:00 p.m.** at the AC Transit General Offices, Second Floor Board Room, 1600 Franklin Street, Oakland, California, to receive public comment on the permanent elimination of Line 275 and continuation of Flex Service as more specifically described below under "PROJECT DESCRIPTION".

The proposed service change is detailed on AC Transit's website at [www.actransit.org](http://www.actransit.org), and available in printed format at the District's General Offices, located at 1600 Franklin Street, Oakland, California, and at a variety of other locations, including main county and city offices as well as the main libraries located within the District's service area. For information on locating the documents in your specific area, please telephone (510) 891-7175.

#### **PROJECT DESCRIPTION:**

Staff is requesting that the Board consider the permanent elimination of Line 275 and the continuation of Flex Service in Newark and Castro Valley.

In March 2017, the District temporarily suspended Line 275, in Newark, to independently test a dynamically scheduled demand-response transit service branded as Flex, which had been operating alongside Line 275 since June 2016 (Flex has also been operating in Castro Valley as an overlay to existing service). The Flex service allows customers to book trips on any internet-enabled device, as well as through the District's customer service call center. Customers book trips from a set of designated bus stops in the Fremont, Newark, and Castro Valley areas: including the Castro Valley and Union City BART stations. Continuing the service will allow the District to integrate Flex into the sign-up and operator training process, and allow staff to finalize and implement a service plan that would lead to high frequency service on all major corridors in Fremont and Newark with Flex providing service where there are currently hourly or half-hourly routes.

If approved by the Board of Directors, the elimination of Line 275 and continuation of Flex Service would remain permanent in March 2017.

### **Your Comments Are Invited**

Public Comment on the elimination of Line 275 and continuation of Flex Service is invited either in writing or at the public hearing scheduled for 5:00 p.m. on Wednesday, December 13, 2017 at the AC Transit General Offices, Second Floor Board Room, 1600 Franklin Street, Oakland, California. The public is urged to submit **written comments** by letter, facsimile, or email, which must be received no later than Monday, December 11, 2017 at 5:00 p.m. in order for comments to be copied and provided to the Board of Directors for review prior to the hearing. Written comments will receive the same attention as verbal



comments received at the Public Hearing. Please address written comments to the AC Transit Board of Directors, 1600 Franklin Street, Oakland, California, 94612; by facsimile at (510) 891-7157; or by email to [planning@actransit.org](mailto:planning@actransit.org). Comments may also be submitted by voicemail at (510) 891-7201. For Spanish-language comments, call (510) 891-7291; and for Chinese-language comments, call (510) 891-7292.

**Meeting site is wheelchair accessible**

Spanish and Chinese interpreters will be available at the hearing. Upon request with 72 hours notice and subject to availability, a sign language interpreter or a foreign language interpreter for languages other than those mentioned in this notice will be present at the hearing. Please contact the District Secretary's Office at (510) 891-7201 to make arrangements. For TDD for hearing impaired, call 711, California Relay Service, and specify (510) 891-4700.

**Transit to the Hearing Site**

All AC Transit bus lines serving downtown Oakland stop within walking distance of the public hearing site. For trip-planning, visit [www.actransit.org](http://www.actransit.org) or call 511 (and say, "AC Transit"). The site can also be reached via BART to the 19<sup>th</sup> St. Oakland station.

**Please do not wear scented products to the meeting.**

# Notice of Exemption

## Appendix E

To: Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

County Clerk

County of: Alameda

1106 Madison Street

Oakland, CA 94607

From: (Public Agency): Alameda-Contra Costa Transit District  
1600 Franklin Street  
Oakland, CA 94612

(Address)

Project Title: Line 275/Flex Service

Project Applicant: Alameda-Contra Costa Transit District

Project Location - Specific:

Flex serves existing AC Transit bus stops in Castro Valley and Newark, CA.

Project Location - City: Castro Valley and Newark Project Location - County: Alameda

Description of Nature, Purpose and Beneficiaries of Project:

Approval of the elimination of Line 275 and continuation of Flex Service in Newark and Castro Valley. AC Transit Flex service is a bus stop to bus stop service that allows customers to schedule accessible trips on demand using mobile or desktop devices, District's customer service call center, or at select BART stations.

Name of Public Agency Approving Project: Alameda-Contra Costa Transit District

Name of Person or Agency Carrying Out Project: Alameda-Contra Costa Transit District

Exempt Status: (check one):

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☐ Categorical Exemption. State type and section number: \_\_\_\_\_
- ☐ Statutory Exemptions. State code number: \_\_\_\_\_

Reasons why project is exempt:

Based on the nature of the service change, staff has determined that the proposal falls under a "general rule" exemption (CEQA Guidelines Section 15061(b)(3)). A general rule exemption applies to projects that do not fit within a statutory or categorical exemption, but where it can be clearly demonstrated that the project has no potential to have significant environmental effects. As the project would involve relatively minor (continued)

Lead Agency  
Contact Person: Denise Standridge Area Code/Telephone/Extension: 510.891.4833

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☒ Yes ☐ No

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Title: General Counsel

☐ Signed by Lead Agency ☐ Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.  
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: \_\_\_\_\_

**NOTICE OF EXEMPTION FOR LINE 275/FLEX SERVICE  
PAGE 2**

Changes to bus schedules, routes, and equipment that are intended to increase the efficiency of the overall AC Transit system, no significant effects would result. There is no substantial evidence that there are unusual circumstances (including future activities) resulting in (or which might reasonably result in) significant impacts which threaten the environment.