



Means Based Parking Pricing Study

FINAL REPORT
APRIL 2023



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Executive Summary

On March 24th, 2022, the BART Board of Directors requested BART's Customer Access and Accessibility Department to initiate this Means-Based Parking Pricing Study to evaluate options for improving the affordability of BART for low-income riders who drive and park. This report presents the study results.

Task 1: Background describes the demographic characteristics of low-income BART riders and parkers and identifies lessons learned from relevant peer agency programs. It finds that almost 30 percent of BART's ridership is low-income, but 3 percent of BART's ridership is comprised of low-income parkers. Although a small group, low-income parkers face real barriers to affording the cost of using BART.

Task 2: Program Options and Evaluation Criteria defines four options for improving the affordability of BART for low-income parkers along with criteria for evaluating the options. These include:

- Option A. Increase the existing Clipper START transit discount from 20% to 50% to reduce overall transportation costs for the low-income. Parking rates would not be discounted.
- Option B.1. Provide a 50% BART parking discount for low-income individuals who qualify for the regional Clipper START program.
- Option B.2. Provide a 50% BART parking discount for low-income individuals who meet eligibility criteria defined by BART (assumed to be 50% of the Area Median Income).
- Option C. Lower parking caps at auto-dependent, low-income stations by 50%. For example, if the maximum daily fee rate is \$8, the parking rate at these stations could not exceed \$4.

Task 3: Evaluation and Recommendations evaluates the options against three main criteria:

- Support for BART's Station Access Policy, which states that BART should encourage non-automobile modes of transit access, and the BART-endorsed regional Seamless Transit Principles which state that regional transit programs and fare policies should be consistent across agencies.
- Cost effectiveness and discounts paid, including an evaluation of the alternative's administrative costs relative to the amount of discount paid out.
- Time to implement the option.

The report recommends Option A (Increase the existing Clipper START transit discount from 20% to 50%) as the best approach to improve the affordability of BART for low-income riders. This option is consistent with BART policies, would not require additional administrative costs, provides the most significant discounts, and would be quick to implement. Rather than creating a new discount program focused on parking, this option leverages the region's investment in the existing Clipper START discount program to serve the same purpose of helping those in need afford BART. The Board may increase the amount of the discount, rather than creating new discount programs, to offset the cost of parking.

Introduction

BART's Parking Policy, last updated 2013, sets a price cap of \$3 for daily parking at most stations. The BART Board of Directors is considering increasing this cap and is concerned about the impact on low-income BART riders, especially those who have few alternatives to driving. On March 24th, 2022, the Board requested BART's Customer Access and Accessibility Department to initiate this Means-Based Parking Pricing Study to evaluate options for improving the affordability of BART for low-income riders who drive and park. In parallel, BART's Office of Civil Rights is completing a Title VI Equity Analysis to identify whether proposed parking policy changes will have a disparate impact to minority riders and/or present a disproportional burden to low-income riders.

This report presents the results of the Means-Based Parking Pricing Study, organized around the study tasks:

- **Task 1: Background.** This section describes the demographic characteristics of low-income BART riders and parkers and identifies lessons learned from relevant peer agency transportation discount programs.
- **Task 2: Program Options and Evaluation Criteria.** This section defines four options for improving the affordability of BART for low-income parkers along with criteria for evaluating the options.
- **Task 3: Evaluation and Recommendations.** This section evaluates the options and provides recommendations for Board consideration.

Task 1: Background

Overview

This task provides relevant background information to inform development of program options for helping low-income parkers afford BART. It contains three sub-sections:

- **Demographic characteristics of low-income BART riders:** This section describes the demographic characteristics of low-income BART riders and parkers.
- **Affordability analysis:** This section describes the affordability challenges faced by transit riders in general and discusses how the cost of accessing BART may affect household budgets.
- **Peer agency scan:** This section identifies relevant examples of peer agency programs that address transportation affordability and summarizes lessons learned.

Demographic characteristics of low-income BART riders

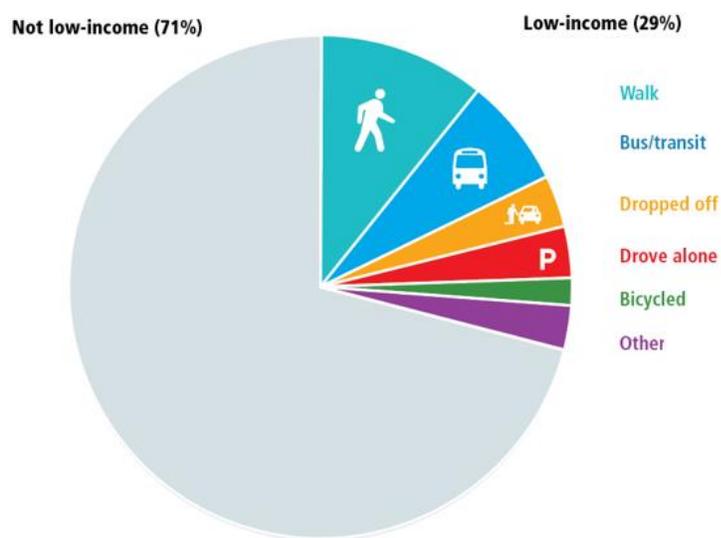
BART has historically defined low-income BART riders as those making less than 200% of the federal poverty level (FPL).¹ This level is approximated by considering the household size and income of respondents to the

¹ 2022 Poverty Guidelines (<https://aspe.hhs.gov/sites/default/files/documents/175e430d7dd4b1622d7245bc8664b3c2/HHS-Poverty-Guidelines-Fed-Register-2022.pdf>)

biennial Customer Satisfaction Survey. For example, a household of two with an income of \$36,000 would be considered low-income. In October 2022, 29% of BART riders could be considered low-income, which is up from 2018 (20%) but down from 2020 (41%) during the height of the COVID-19 pandemic. See Appendix A for more information on low-income definitions, and Appendix B for additional relevant statistics from the 2022 Customer Satisfaction Survey.

Among BART’s low-income riders, approximately 11% drive alone to the station. This means that approximately 3% of all BART riders are considered low-income parkers. Weekend riders are more likely to be low income than weekday riders. In general, higher income riders are more likely than low-income riders to drive alone to BART.

Figure 1 - BART Riders Mode of Access



BART has limited data regarding where low-income riders and parkers live.² However, it’s likely that low-income parkers generally live where low-income households live in the Bay Area, such as in urban areas like Oakland and Richmond. Figure 2 shows BART’s station access typology³ overlaid with low-income data for the San Francisco Bay Area. BART’s station access typology groups stations into five types (Urban, Urban with Parking, Balanced Intermodal, Intermodal – Auto Reliant, and Auto Dependent) based on metrics including ridership, surrounding street networks, parking capacity, transit service type and frequency, and mode of access. The station access typology is a helpful tool in considering what options riders have to access the station. For example, riders at “Urban”, “Urban with Parking” and “Balanced Intermodal” stations have a variety of access options such as walking, bicycling, or transit. Riders at “Intermodal – Auto Reliant” and “Auto Dependent” stations have fewer options. Riders at Auto-Dependent stations with low-income populations like Antioch, Pittsburg/Bay Point, and North Concord/Martinez may be more likely impacted by parking price increases, as they have fewer alternatives to the automobile.

² BART’s 2015 Station Profile Survey has detailed information on rider income by home station, but is now too out-of-date to use.

³ BART Station Access Policy (<https://www.bart.gov/about/planning/station-access/policy>)

Figure 2 – Station Access Typology & Low-Income Households in the Bay Area



The share of parkers paying by cash is another possible source of data to inform where low-income parkers live. While riders may choose cash for several reasons (such as being new to parking), lower-income individuals are more likely than higher-income individuals to use cash.⁴ Table 1 below provides a list of the stations with the greatest frequency of cash transactions as a percentage of all parking transactions. There are higher percentages of parkers paying by cash at Richmond, Pittsburg/Bay Point, and El Cerrito del Norte, which suggests that more low-income parkers may live near these stations.

Table 1 – Top 10 stations with largest percentage of parkers using cash to pay for Daily Fee parking

Station	Monthly Transactions	Cash %	Credit/Debit %	EZ Rider %	Mobile App %
Richmond	2,000	33%	19%	24%	24%
Pittsburg/Bay Point	8,700	30%	15%	30%	25%
El Cerrito del Norte	10,700	29%	19%	23%	30%
South Hayward	5,000	27%	11%	37%	25%
San Leandro	7,800	23%	18%	29%	30%
Bay Fair	7,500	22%	14%	37%	27%
Pittsburg Center	400	21%	22%	19%	38%
Coliseum	1,800	21%	25%	27%	27%
Antioch	8,900	20%	17%	26%	38%
Glen Park	400	20%	39%	0%	41%

Source: BART parking financial transactions, March 2023

Affordability Analysis

This section describes the affordability challenges faced by transit riders in general, and how the cost of accessing BART may affect household budgets. The Center for Neighborhood Technology (CNT)'s Housing and Transportation (H+T) Affordability Index offers an expanded view of affordability, where housing and transportation costs do not exceed 45% of household income, with approximately 30% designated for housing and 15% designated for transportation. According to their analysis, all cities served by the BART district have transportation costs that account for more than 15% of household incomes, except for San Francisco. See Appendix C for CNT's analysis of housing and transportation costs for cities served by the BART District.

With the 45% H+T affordability framework in mind, an analysis was conducted to see how riders might budget for transportation and how BART fares impact their monthly budget. Based on the 200% FPL, an individual rider is considered low-income if they make less than \$27,180. A low-income rider should spend less than \$12,231 annually on housing and transportation, or roughly \$1,000 monthly. Table 2 provides an annual and monthly budget for housing, transportation, and housing + transportation.

Transportation costs are likely already more than 15% of household income for low-income BART customers, especially those living at end-of-line stations. For example, the round-trip fare from Antioch to downtown

⁴ <https://www.pewresearch.org/fact-tank/2022/10/05/more-americans-are-joining-the-cashless-economy/>

San Francisco is \$16.40 and daily fee parking is \$3 per day for a total trip cost of \$19.40. If an individual drives and parks at BART and makes 20 roundtrips in a month, this equals \$388 for the month – which is higher than the \$340 monthly budget. This does not account for the costs of car ownership, which is estimated to be \$4,796 annually in California⁵, as well as many other trips not made by BART. This is an illustrative example of the challenges facing low-income riders who park.

Table 2 - Housing and Transportation Annual and Monthly Budgets for Low-Income Households

Household Size	Annual Housing & Transport Budget				Monthly Housing & Transport Budget		
	Low-income (200% FPL)	Housing + Transport (45%)	Housing (30%)	Transport (15%)	Housing + Transport (45%)	Housing (30%)	Transport (15%)
1	\$27,180	\$12,231	\$8,154	\$4,077	\$1,019	\$680	\$340
2	\$36,620	\$16,479	\$10,986	\$5,493	\$1,373	\$916	\$458
3	\$46,060	\$20,727	\$13,818	\$6,909	\$1,727	\$1,152	\$576
4	\$55,500	\$24,975	\$16,650	\$8,325	\$2,081	\$1,388	\$694
5	\$64,940	\$29,223	\$19,482	\$9,741	\$2,435	\$1,624	\$812
6	\$74,380	\$33,471	\$22,314	\$11,157	\$2,789	\$1,860	\$930

Peer Agency Scan

Staff reviewed relevant peer agency programs, including regional and national examples, to identify lessons learned that could be informative for BART. Appendix D contains the review. Key findings from the review are as follows:

- Many transport discount programs exist, but few focus on parking.** The review identified many examples of transportation discount programs, such as bulk discounted monthly transit passes provided to social service agencies; low-income discounts on toll payments; and means-based transit discount programs such as the Bay Area Clipper START or Sound Transit Orca Card discount program. Few examples were identified of low-income discount programs for parking. BART’s peer transit agencies are not providing parking discounts. Some cities provide residential parking permit discounts for those who qualify for low-income housing vouchers. Parking discounts are also available to commuters (of all income levels) through employers who participate in federal or local commuter benefits programs.
- Programs typically have an income requirement based on the Federal Poverty Level.** Most transportation benefit programs included in the review based the program income requirement on the Federal Poverty Level. In some cases, transportation discounts are based on the Average Median Income (AMI) if the discount is linked to a housing program.
- Income verification requires significant administrative effort.** The review identified that administration of low-income benefit programs is administratively burdensome and costly. Some

⁵ <https://ktla.com/news/california/this-is-how-much-it-costs-to-own-a-car-in-california-according-to-a-study/>

agencies avoid new costs by relying on social service agencies to verify Income, assess eligibility, and distribute benefits.

- **Lack of awareness is a key barrier to participation.** Lack of awareness and application complexity can result in low participation rates by eligible populations, which can undermine program effectiveness. For example, the Bay Area Clipper START program has had lower than expected enrollment, although it has been increasing over time. Strong marketing and awareness campaigns are planned to further increase enrollment.

Task 2: Program Options and Evaluation Criteria

Proposed Alternatives

Staff studied options for improving the affordability of the entire BART trip (including access to BART) for the low-income populations most impacted by parking price increases. The proposed alternatives include the following:

- A. Increase Clipper START transit discount. Clipper START is a regional pilot enhancing affordability for low-income riders, and currently offers a 20% single-ride discount on all BART fares to enrolled riders. This option would increase the Clipper START fare discount from 20% to 50%, thus reducing overall transportation costs for the low-income. Parking rates would not be discounted.
- B. Parking discount program. This option would provide a parking discount for low-income individuals. The amount of the discount is assumed to be 50%. For example, if the daily fee rate is \$3, parking rates would be discounted to \$1.50 for program participants. Only those who have a registered parking account with BART would be able to participate. Two sub-options were considered:
 - B.1. Regionally-defined eligibility. In this option, participants registered with the regional Clipper START program would be eligible for a parking discount through BART. Eligibility would be determined by MTC and be consistent with Clipper START (currently 200% of the Federal Poverty Level). For example, a household of two making less than \$36,620 would be eligible.
 - B.2. BART-defined eligibility. In this option, eligibility would be determined by BART through a new program. For evaluation purposes, the eligibility threshold for this new program will be defined as less than 50% of Area Median Income (AMI) for Alameda and Contra Costa counties. For example, a household of two making less than \$57,150 would be eligible.
- C. Lower parking caps at auto-dependent, low-income stations. This option would apply a lower parking rate cap at auto-dependent, low-income stations (i.e., Antioch and Pittsburg Bay Pt) that is 50% lower than other stations. For example, if the maximum daily fee rate is \$8, the parking rate at these stations could not exceed \$4.

Proposed Evaluation Criteria

The alternatives will be evaluated against three criteria.

Criterion 1: Supports BART Policy Goals

This criterion measures how well the alternative aligns with relevant BART policies including the 2016 Station Access Policy⁶ and the Board-endorsed 2020 Seamless Transit Principles.⁷ Each alternative was scored qualitatively according to professional judgement, following these evaluation questions:

1.1 Mode shift & transportation choice: Is the alternative consistent with the Station Access Policy “Safer, Healthier, Greener” goal to advance safety, public health, and greenhouse gas reduction by reducing the access mode share of the automobile, and to provide transportation access choices for riders? (1-3 pts)

1.2 Efficient parking management: Is the alternative consistent with the Station Access Policy “More Riders” goal to grow ridership by managing access resources so as not to exacerbate peak period, peak direction crowding, including by ensuring users can find parking spaces at all times of day? (1-3 pts)

1.3 Customer experience/ease of enrollment: Is the alternative consistent with Seamless Transit Principles #1 & #4 to run all Bay Area transit as one easy-to-use system, and to align fare policies? (1-3 pts)

1.4 Equitable transit: Is the alternative consistent with Seamless Transit Principle #2 to make public transit equitable and accessible to all people of all income levels, ages, abilities, genders, and backgrounds – and that people with limited means to pay for transit should be provided with discounts? (1-3 pts)

The points for each of these elements are averaged to generate an overall score for this criterion by alternative.

Criterion 2: Cost Effectiveness and Benefits

This criterion measures how well the strategy minimizes administrative burden and costs to BART. Staff estimated order of magnitude initial and ongoing program costs including startup and ongoing costs for technology, marketing, staff time, and benefit payouts. Staff also evaluated how much the alternative benefits low-income parkers by estimating the annual subsidy received by this group. Each alternative was scored 1-3 based on the relative cost effectiveness and benefits compared to the other alternatives.

Criterion 3: Reduce Time to Implement

This criterion estimates how long the program would take to implement in years. Each alternative was scored 1-3 based on the relative amount of time required to implement compared to the other alternatives.

⁶ See <https://www.bart.gov/about/planning/station-access/policy>

⁷ The Seamless Transit Principles were developed by a coalition of regional non-profit groups and endorsed by the BART Board of Directors on November 19th, 2020.

Task 3: Program Evaluation and Recommendations

This section evaluates each of the alternatives against the three criteria. The alternatives are rated on a 1-3 scale, with 3 being most aligned to the criteria and 1 being the least.

Criterion 1: Supports BART Policy Goals

Table 3 summarizes how the alternative were evaluated against the policy goals. The ratings were assigned by an internal staff working group with representatives from the Customer Access, Financial Planning, and Office of Civil Rights departments.

Table 3 – Qualitative Rating of Alternatives Against the Policy Goals

Alternative		Score (1-3)	Justification
Alt A: Expand Clipper START Transit Discount			
1.1	Mode shift & transportation choice	3	Treats all transit access modes equally; gives riders choice of access mode
1.2	Efficient parking management	3	Does not interfere with demand-based parking pricing; allows parking to be managed according to demand.
1.3	Customer experience/ease of enrollment	3	No additional program rules to remember/no additional action required by the Customer
1.4	Equitable transit	3	Benefits all low-income BART riders, not just those who are parking.
Alt B.1 Parking Discount with Clipper START Based Eligibility			
1.1	Mode shift & transportation choice	1	Subsidizes driving over other modes of access.
1.2	Efficient parking management	2	Lowering parking prices for some individuals even when lots are full may lead to less efficient parking management.
1.3	Customer experience/ease of enrollment	3	Program enrollment will be easy / automatic for those enrolled in Clipper START.
1.4	Equitable transit	2	Does not benefit all low-income riders; only benefits those who drive and park.
Alt B.2 Parking Discount with BART-Defined Eligibility			
1.1	Mode shift & transportation choice	1	Subsidizes driving over other modes of access.
1.2	Efficient parking management	2	Lowering parking prices for some individuals even when lots are full may lead to less efficient parking management.
1.3	Customer experience/ease of enrollment	1	Customers will need to enroll in an entirely separate (BART-run) benefit program, in addition to enrolling in Clipper START.
1.4	Equitable transit	2	Does not benefit all low-income riders; only benefits those who drive and park.

Alt C Lower Price Caps at Auto-Dependent & Low-Income Stations			
1.1	Mode shift & transportation choice	1	Subsidizes driving over other modes of access.
1.2	Efficient parking management	1	May lead to unintended parking management consequences, such as people from a nearby station diverting to the subsidized station to access lower prices, thus leading to earlier fill times and more congested parking. Reduces or eliminates the ability to manage parking demand with price at affected stations.
1.3	Customer experience/ease of enrollment	3	Seamless for the customer, no sign up or paperwork required.
1.4	Equitable transit	1	Only helps low-income parkers at selected stations and ignores all low-income parkers at all other stations. Higher income individuals at affected stations will also receive the subsidy, thereby reducing the share of funds spent to benefit the low income.

Table 4 summarizes the ratings by alternative and provides an average rating for each.

Table 4 – Criterion 2 - Summary of Ratings by Alternatives

Options	Mode shift & choice	Efficient parking management	Customer experience/ease of enrollment	Equitable transit	Average
A. Expanded Clipper START fare discount	3	3	3	3	3
B.1 Parking discount (Clipper START based eligibility)	1	2	3	2	2
B.2 Parking discount (BART-defined eligibility)	1	2	1	2	1.5
C. Cap rates at auto-dependent, low-inc. stations	1	1	3	1	1.5

Criterion 2: Cost Effectiveness

This criterion measures how well each alternative minimizes administrative burden and costs to BART while maximizing benefits in the form of discounts paid to low-income parkers. Staff estimated the order of magnitude of initial and ongoing program costs, and also considered the annual subsidy received by each group by the year 2027 (when all options could be fully implemented). Each alternative was scored 1-3 based on the relative cost effectiveness and benefits compared to other alternatives.



Alternative A: Expand Clipper START Discount

Estimated Program Administrative Costs

Expanding the Clipper START discount does not incur any additional administrative costs for BART since administration costs such as outreach are led by MTC. The change in discount from 20% to 50% off BART fares is a policy change and would require a simple updated fare table.

Estimated Subsidies Paid

The benefits depend on the adoption rate of the Clipper START program. The program was launched in July 2020 and as of August 2022, about 5-16% of eligible low-income riders are taking advantage of the program at a regional level.⁸ Clipper START accounts for just 1% of BART trips and about 3,500 unique Clipper START riders use BART every month.

By FY2027, staff estimate a total benefit of \$6 million in subsidies received by Clipper START participants annually. Considering approximately 11% of low-income riders drive alone to BART, this means approximately \$700,000 in annual benefits to low-income parkers. These estimates are based off BART's most current ridership estimates and consider a 25% Clipper START participation rate and a 0.22 planning elasticity.

Alternative B.1 Means-Based Parking with Regionally Defined Eligibility

Estimated Program Administrative Costs

In this alternative, all program eligibility, enrollment, and verification costs would be performed by MTC with no additional cost to BART. BART would need to make a technology investment to allow Clipper START enrollees to obtain a BART parking discount. This investment includes two elements:

- BART's parking payment platform would need to be updated to include a mechanism for discounting parking rates for certain individuals. This is expected to cost in the low hundreds of thousands of dollars.
- BART's parking payment platform would need to be integrated with the software behind MTC's Clipper START program so that it can recognize when someone paying for parking is using a Clipper Card associated with the Clipper START fare product, and provide the parking discount to that individual. The approach to this software integration is unknown and additional work would be necessary to determine how it would be achieved. Similar software integrations have been budgeted in the hundreds of thousands of dollars.

In addition to these software costs, there would be an ongoing technology annual maintenance cost estimated at about 20% of the startup costs. Overall, this program is estimated to cost in the hundreds of thousands of dollars to implement, with ongoing costs in the tens of thousands.

Estimated Subsidies Paid

By FY2027, staff estimate a total annual subsidy of \$200,000 to low-income parkers. This estimate is based off BART's parking model, which considers ridership and parking occupancy levels, including when and which stations may see a parking price increase. This also assumes a 25% participation rate for all eligible parkers.

⁸ <https://bart.legistar.com/MeetingDetail.aspx?ID=1090553&GUID=5827D5DE-8DFF-4E56-BCA5-72B94D3D8765&Options=info|&Search=>

Alternative B.2 Means-Based Parking with BART Defined Eligibility

Estimated Program Administrative Costs

Staff referenced Clipper START program costs to inform estimates of the cost of a new, BART-administered parking discount program. According to the Year 1 Evaluation Report, the Clipper START budget is \$3M over three years. The major costs were for eligibility verification (33%), marketing and outreach (32%), website and database operating and maintenance costs (28%) and evaluation (7%).

A similar BART program administered by BART is expected to include the following types of costs:

- Startup technology costs: this includes costs to develop a new database to track and manage eligibility; a website where individuals can sign up and manage their accounts; creation of a parking discount module within BART's parking payment software platform; and integration of BART's parking payment software platform with the program enrollment database. Based on a comparison to the cost of Clipper START and conversation with MTC staff, these costs are estimated in the low millions.
- Ongoing staffing for program oversight: Estimated at about 1 FTE.
- Ongoing eligibility verification costs. This is estimated to cost hundreds of thousands per year, based on MTC's costs to hire an eligibility verifier for Clipper START (and assuming BART would have proportionally lower costs).
- Ongoing technology maintenance costs. Maintaining the software described above (e.g. website, database, software integration, parking platform) is expected to cost in the low hundreds of thousands per year. Typically, software maintenance costs about 20% of the initial startup costs per year.

Overall, the program is expected to cost several million in startup costs and a million a year or more in ongoing costs.

Estimated Subsidies Paid

By FY2027, staff estimate a total annual subsidy of \$400,000 to low-income parkers. This subsidy is about double the subsidy for Alternative B1 since the eligibility criteria is greater. This estimate is based off BART's parking model, which considers ridership and parking occupancy levels, including when and which stations may see a parking price increase. This also assumes a 25% participation rate for all eligible parkers.

Alternative C Lower Price Caps at Low Income, Auto Dependent Stations

Estimated Program Administrative Costs

This alternative applies a lower parking rate cap at auto-dependent, low-income stations that is 50% lower than other stations. Staff are currently studying a daily fee rate up to \$8, which means that auto-dependent, low-income stations could never go above \$4. There are no startup or ongoing annual program costs since parking rates are set as part of the parking team's regular functions.

Estimated Subsidies Paid

Under this alternative, staff estimate no benefits or subsidies to low-income parkers by FY2027. BART's parking policy is demand-based, where rates would only be raised up to 30% if occupancy is greater than 90%. In other words, rates would have to increase twice in order to hit a \$4 cap. BART's parking model currently does not project low-income, auto-dependent stations (i.e., Antioch and Pittsburg Bay Point) to fill until after FY2027. Therefore, there are no expected near-term subsidies.

Summary

Among the alternatives, option A rated the best in terms of program cost effectiveness. There are no start-up or annual program operating costs, while the discounts provided are high.

Table 5 – Criteria 2 - Summary of Ratings by Alternatives

Options	Startup costs	Annual program operating costs	Discounts paid to low-income parkers	Total discounts	Program cost effectiveness
A. Expanded Clipper START fare discount	-	-	\$\$	\$\$\$\$	3
B.1 Parking discount (Clipper START based eligibility)	\$\$	\$	\$	-	2
B.2 Parking discount (BART-defined eligibility)	\$\$\$\$	\$\$\$	\$\$	-	1
C. Cap rates at auto-dependent, low-inc. stations	-	-	-	-	N/A
		\$ <250k	\$\$ 250 – 750k	\$\$\$ 750k – 2M	\$\$\$\$ >2M

Criterion 3: Time to Implement

Staff evaluated alternatives for the approximate time required to implement. The evaluation was completed by listing the necessary implementation steps and the time required for each. The estimates reflect time required after the Board has approved the recommended alternative, provided funding for implementation, and conducted any Title VI analyses needed to analyze the new program.

Steps Required by Alternative

Alternative A: Expand Clipper START Discount

In this alternative, staff would implement an updated fare table with the expanded discount for those using the Clipper START product. This simple process typically takes less than six months. Staff would support outreach led by MTC to increase participation in the program.

Alternative B.1 Means-Based Parking with Regionally Defined Eligibility

In this alternative, staff would need to:

- Develop an approach to connect BART’s Mobility as a Service (MaaS) parking back office with the Clipper START back-office systems. This would be necessary to allow BART to identify which users are eligible for a discounted parking price by looking up whether their Clipper Card number is associated with a Clipper START fare product.
- Hire consultant to implement the software integration. Once the requirements are defined, a software consultant would need to be hired to implement the software integration.
- Develop and test integration.
- Develop communications materials and launch program.

The program would only be possible under the new Clipper 2.0 regional system, therefore, the project could not be deployed until the system is completed. Staff estimate between 1.5 and 2 years would be necessary to deploy this alternative, recognizing that Clipper 2.0 may not be available for another year.

Alternative B.2 Means-Based Parking with BART Defined Eligibility

In this alternative, staff would need to:

- Hire new staff to manage the program. As this program requires develop a new business function at BART (e.g. administering a new parking discount program, including verifying eligibility), additional staff would first need to be hired to manage the program.
- Contract for / create enrollment database. Staff would need to issue contracts for development of a new database for managing and tracking enrollment in the program. MTC currently uses Salesforce for this function as part of Clipper START. BART’s existing Salesforce platform could likely be extended to meet this need, but a contract to customize the platform would be necessary.
- Contract for eligibility verification support. Staff would need to issue contracts for managing the process of reviewing and confirming customer eligibility for the program. MTC currently contracts with Cubic Transportation Systems for this function. BART would need to let a similar contract.
- Complete required software integrations / test system. Software developers would need to be hired to integrate the program enrollment database (likely Salesforce) with BART’s Mobility as a Service (MaaS) parking platform, so that the platform can recognize who is eligible for the program.
- Prepare communications materials and launch. Staff would need to develop a comprehensive communications campaign about the new program.

Overall, staff estimate these steps could take 2-4 years.

Alternative C Lower Price Caps at Low Income, Auto Dependent Stations

This alternative would not require any implementation steps except for documenting how low income, auto dependent stations are identified. Staff would simply not increase the parking prices beyond a defined threshold at these stations. Implementation would take less than six months.

Summary

Among the alternatives, Options A and C rated the highest in terms of implementation time. It would take less than 6 months to implement either option, while option B requires additional time.

Table 6 – Summary of Time to Implement by Alternative

Options	Implementation Notes	Estimated Implementation Time	Rating
A. Expanded Clipper START fare discount	Simple update to fare table	<6 months	3
B.1 Parking discount (Clipper START based eligibility)	Requires BART/Clipper 2.0 software integration	1.5-2 years	2
B.2 Parking discount (BART defined eligibility)	Requires new BART program & eligibility verification process	2-4 years	0.5
C. Cap rates at auto-dependent, low-inc. stations	No additional steps required.	<6 months	3

Evaluation Summary and Recommendation

Table 7 below summarizes the evaluation results.

- Option A**, expanding the existing Clipper START fare discount, performed best of all the alternatives. While not focused explicitly on parking, the discount reduces the overall cost of taking BART by providing 50 percent off the BART fare. In most cases, this will amount to a more significant discount than would a parking-focused discount. For example, 50 percent off the average roundtrip BART fare is about \$4.00, more than double the approximately \$1.50 discount that would be expected from a 50% parking discount (parking prices are expected to remain at \$3 for several years at most stations, due to low occupancy). This option supports BART’s Station Access Policy by avoiding encouragement of drive-alone access to stations. It leverages an existing program to provide the discount, so avoids additional administrative costs, and can be implemented very quickly.
- Option B.1**, implementing a new parking discount linked to Clipper START, performed next best. It supports the Seamless Transit Principles by ensuring consistency with the regional Clipper START program and ease of enrollment for those already using Clipper START. It does not support the Station Access Policy goal to reduce automobile access trips to BART stations. By leveraging Clipper START, it avoids new administrative costs related to eligibility review and tracking. However, it still requires investment in a software integration between BART’s parking payment back office and the Clipper back office.

- **Option B.2**, implementing a new BART-administered parking discount, would give BART the flexibility to set its own threshold for eligibility and provide a more generous and inclusive definition of “low income”. However, the program would not be consistent with other regional transit discounts and would require users to apply for an entirely separate program. It has a high implementation cost and long implementation time. This alternative is not recommended.
- **Option C**, setting lower price caps at auto-dependent, low-income stations could be implemented with no additional administrative costs. However, it would not provide meaningful benefits to low-income parkers. Parking prices at affected (low income, auto dependent) stations are not expected to increase for several years; lowering the price cap would not affect these stations until they fill up. If these stations do fill, the lower price cap could attract riders from surrounding stations, exacerbating the crowding problem. Finally, the program would only benefit low-income riders living near the selected stations, and would not benefit all the remaining low-income parkers throughout the District. This alternative is not recommended.

Overall, Option A is recommended as the best approach to improve the affordability of BART for low-income parkers. Rather than creating a new discount program focused on parking, the region’s investment in the existing Clipper START discount program can be leveraged to serve the same purpose of helping those in need afford BART. While the program is still relatively new and adoption rate has been slow, BART can support outreach efforts to increase participation for our low-income parkers and riders. The Board may increase the amount of the discount, rather than creating new discount programs, to offset the cost of parking. This higher discount may incentivize more riders to participate.

Table 7 - Evaluation Summary Ratings

Options	1. Supports BART Policies	2. Cost Effectiveness & Discounts Paid	3. Ease of Implementation
A. Expanded Clipper START fare discount	3	3	3
B.1 Parking discount (Clipper START based eligibility)	2	2	2
B.2 Parking discount (BART defined eligibility)	1.5	1	0.5
C. Cap rates at auto-dependent, low-inc. stations	1.5	1	3

Title VI/Environmental Justice/Limited English Proficiency Joint Advisory Committee

On March 29, 2023, BART staff presented the initial parking policy proposal and initial findings from the means-based parking study to BART's Title VI/Environmental Justice (EJ)/Limited English Proficiency (LEP) Joint Advisory Committee. The study was overall well received, and members gave additional feedback and ideas on how to help disadvantaged populations.

One member asked about discounts for electric vehicles and carpooling. Staff mentioned that carpoolers can currently access the Reserved parking area (which is better located) for the Daily Fee price, while EV discounts are still in discussion. This member was particularly concerned about putting all the discounts to Clipper START since the program is technically still a pilot contingent on budget. Staff noted this concern, and are continuing discussions.

Another member emphasized the importance of partnerships in providing transit benefits. For example, OUSD partners with Clipper to give students Clipper Card bus passes based on their school enrollment demographic information; students do not need to apply with AC Transit for the pass. This member also suggested working with an employment office to provide parking vouchers instead of a cumbersome eligibility and enrollment process.

One member raised the needs of seniors and providing a senior parking discount to promote access and mobility. Staff noted that seniors are currently eligible to receive a 62.5% fare discount.

Staff noted additional opportunities to provide feedback on the parking proposal as part of the BART Board and public hearing process.

Appendices

Appendix A – Definitions of Low-Income

Federal Poverty Level

The U.S. Census Bureau defines national poverty thresholds that varies by household size, number of children in a household, and age of householder.⁹ The national poverty level does not vary geographically although cost of living varies.

For the Bay Area, where cost of living is high and income levels are correspondingly high, a 200% poverty level is often as the definition of low-income.¹⁰ The table below shows the 2022 national Federal Poverty Level as defined by the Department of Health and Human Services (HHS) as an eligibility criterion for Medicaid and a number of other Federal programs.¹¹

Household Size	Federal Poverty Level	200% Federal Poverty Level
1	\$13,590	\$27,180
2	\$18,310	\$36,620
3	\$23,030	\$46,060
4	\$27,750	\$55,500
5	\$32,470	\$64,940
6	\$37,190	\$74,380
7	\$41,910	\$83,820
8	\$46,630	\$93,260

Area Median Income

The U.S. Department of Housing and Urban Development (HUD) sets federal and state income limits with maximums for a variety of programs, such as the Section Housing Choice Voucher program. HUD’s limits are based on surveys of local area median income (AMI) for each county. HUD defines “extremely low-income” as 15-30% of AMI and “very low income” as 30% to 50% of AMI.¹²

Another way to define low-income is to consider this “extremely low-income” and “very low-income” category as defined by HUD. The tables below show the 2022 levels for the five San Francisco Bay Area counties served by the District.¹³

Extremely low-income (15-30% of AMI)

⁹ <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

¹⁰ <https://www.vitalsigns.mtc.ca.gov/poverty>

¹¹ <https://aspe.hhs.gov/sites/default/files/documents/175e430d7dd4b1622d7245bc8664b3c2/HHS-Poverty-Guidelines-Fed-Register-2022.pdf>

¹² <https://www.hcd.ca.gov/grants-and-funding/income-limits>

¹³ <https://www.hcd.ca.gov/docs/grants-and-funding/inc2k22.pdf>

Household Size	Alameda	Contra Costa	San Francisco	San Mateo	Santa Clara
1	\$30,000	\$30,000	\$39,150	\$39,150	\$35,400
2	\$34,300	\$34,300	\$44,750	\$44,750	\$40,450
3	\$38,600	\$38,600	\$50,350	\$50,350	\$45,500
4	\$42,850	\$42,850	\$55,900	\$55,900	\$50,550
5	\$46,300	\$46,300	\$60,400	\$60,400	\$54,600
6	\$49,750	\$49,750	\$64,850	\$64,850	\$58,650
7	\$53,150	\$53,150	\$69,350	\$69,350	\$62,700
8	\$56,600	\$56,600	\$73,800	\$73,800	\$66,750

Very low-income (30-50% of AMI)

Household Size	Alameda	Contra Costa	San Francisco	San Mateo	Santa Clara
1	\$50,000	\$50,000	\$65,250	\$65,250	\$59,000
2	\$57,150	\$57,150	\$74,600	\$74,600	\$67,400
3	\$64,300	\$64,300	\$83,900	\$83,900	\$75,850
4	\$71,400	\$71,400	\$93,200	\$93,200	\$84,250
5	\$77,150	\$77,150	\$100,700	\$100,700	\$91,000
6	\$82,850	\$82,850	\$108,150	\$108,150	\$97,750
7	\$88,550	\$88,550	\$115,600	\$115,600	\$104,500
8	\$94,250	\$94,250	\$123,050	\$123,050	\$111,250

Appendix B – Customer Satisfaction Survey Stats

BART’s Customer Satisfaction Survey is a tool to help BART prioritize efforts to achieve higher levels of customer satisfaction. The study involves surveying BART customers onboard randomly selected train cars every two years. The most recent Customer Satisfaction Survey was conducted primarily between October 11 to October 29, 2022 on both weekdays and weekends and resulted in 3,022 completed questionnaires.

The Customer Satisfaction Survey is a robust data source that provides additional information on BART’s low-income riders. See table below for how low-income riders access the BART station.

Access mode	2022		2020		2018	
	Low-income	Not low-income	Low-income	Not low-income	Low-income	Not low-income
Walked all the way	37%	34%	38%	36%	34%	31%
Bicycled	6%	8%	6%	7%	5%	6%
Bus/transit	24%	14%	26%	15%	23%	11%
Drove alone	11%	24%	9%	23%	16%	33%
Carpooled	3%	4%	3%	2%	5%	6%
Dropped off	12%	10%	10%	10%	9%	8%
Uber, Lyft, taxi	5%	3%	5%	4%	7%	4%
Other	2%	3%	3%	2%	1%	1%
Total	100%	100%	100%	100%	100%	100%

Appendix C – Housing + Transportation Costs for Cities in BART District

The following table shows the Center for Neighborhood Technology’s analysis for the percentage of household income dedicated to housing and transportation, including 2019 American Community Survey (ACS) data and 2019 Longitudinal Employer-Household Dynamics data.¹⁴ Several cities served by the BART district have households that devote a larger portion of their income to transportation (higher than 15%).

City	Housing Costs (H)	Transpo. Costs (T)	H+T	T (Low)	T (High)
Alameda					
Berkeley	27%	13%	40%	9%	18%
Castro Valley	28%	16%	43%	13%	19%
Fremont	32%	15%	47%	10%	20%
Hayward	25%	15%	40%	11%	19%
Oakland	23%	13%	36%	6%	18%
Pleasanton	35%	16%	51%	13%	20%
San Leandro	23%	15%	38%	12%	18%
Union City	30%	16%	45%	13%	19%
Contra Costa					
Antioch	22%	16%	38%	11%	19%
Concord	24%	15%	39%	10%	19%
El Cerrito	29%	14%	43%	11%	17%
Lafayette	37%	15%	52%	12%	18%
Orinda	41%	16%	57%	14%	18%
Pittsburg	21%	16%	37%	11%	19%
Pleasant Hill	28%	14%	42%	11%	17%
Richmond	21%	14%	35%	11%	18%
Walnut Creek	31%	13%	44%	11%	18%
San Francisco					
San Francisco	28%	9%	37%	3%	16%
San Mateo					
Colma	26%	15%	41%	12%	18%
Daly City	28%	15%	43%	11%	17%
Millbrae	37%	15%	51%	12%	18%
San Bruno	32%	15%	47%	12%	18%
South San Francisco	29%	15%	44%	12%	18%
Santa Clara					
Milpitas	27%	15%	42%	12%	19%
San José	26%	15%	41%	8%	19%

¹⁴ Center for Neighborhood Technology H+T Affordability Index - <https://htaindex.cnt.org/about/>

Appendix D – Review of Peer Agency Transportation Equity Programs

This appendix summarizes relevant examples of peer agency transportation equity programs, to help answer the following questions:

- How common are means-based transportation discount programs? Do they exist for parking?
- How are programs typically administered?
- What income thresholds are typically used?
- What are key lessons learned from existing programs?

This appendix first describes key findings from case studies already summarized in the Metropolitan Transportation Commission's Means-Based Transit Fare Pricing Study. It then describes the Clipper START program, which resulted from the MTC study. It finally describes additional relevant case studies of parking affordability programs.

Regional Means-Based Transit Fare Pricing Study Case Studies

The Regional Means-Based Transit Fare Pricing Study summarized existing means-based discount programs and transit fare subsidy programs in Technical Memorandum 1 - Policies and Conditions (2016). This section summarizes relevant key findings. The report listed multiple types of subsidy programs: (1) Social service programs, (2) Tolling programs and (3) Transit discount programs.

Social Service Programs

Low income people in California benefit from many social service programs, including CalFresh (support for food purchases), Medi-Cal (discount health care), PG&E Care (Discounted energy bills), and CalWorks (living expenses support for the unemployed), and many others. Of note, Calworks provides a transportation allowance in the form of bus passes, train fare or payment for miles driven.

Tolling Programs

The report cited several examples of low-income discounts for tolling programs, such as the Metro Los Angeles Express Lanes Low Income Assistance Plan. At the time of the report publication, this program provided a one-time \$25 credit applied to pre-paid toll or transponder deposit for Los Angeles County residents that have a household income equal to or less than 200% of the Federal Poverty Level.

Transit discount programs

All Bay Area transit agencies provide discounts for the elderly and disabled, as required by federal law. Many also provide discounts for youth. These populations, particularly the disabled, are disproportionately low income. Demographic analysis (dated 2012) indicated that 76 percent of the disabled population had incomes under \$25k. The Regional Transit Connection (RTC) program qualifies persons with disabilities for discounted fares throughout the Bay Area. BART currently offers a 62.5 percent discount for RTC card holders. In addition to these federally mandated discounts, many transit agencies have offered various types of low-income bulk ticket sales programs, such as distribution of discounted monthly transit passes in bulk to social service providers.

Key findings from the report:

- **Programs typically have an income requirement based on the Federal Poverty Level.** Most programs have an income-based requirement with many based on the Federal Poverty Level (FPL). When an income threshold is not specified, programs require enrollment in other low-income assistance programs for eligibility. All programs accept the same types of documents for income verification, such as paycheck stubs, federal and state tax returns, and award letters from social service programs. Some programs (e.g., HUD Housing Choice Voucher Section 8 and CalWORKs) have more stringent requirements for verifying income.
- **Introducing income verification may require significant administrative effort.** For example, when the Federal Communications Commission mandated that state programs that provide reduced rates for low income customers, such as California LifeLine, verify customer eligibility, the Commission hired a team of ten full time employees to address appeals and complaints. The report recommended avoiding new costs by relying on social service agencies to verify income, assess eligibility, and distribute benefits.
- **Many programs distribute benefits electronically.** Program benefits are distributed on one-time, monthly, and ad hoc bases in the form of discounts and cash benefits, and are delivered through transponders, reduced monthly payments, housing vouchers, and EBT and BIC cards. Many of these are delivered electronically. The report recommended using smart media to manage program eligibility, minimize costs and operating impacts, and control abuse.
- **Application complexity is a key barrier to participation.** Application barriers such as mandated fingerprinting, excessive verification, and old forms and processes prevent programs from reaching full penetration. CalFresh requires all these steps to participate in the program, preventing it from achieving a high penetration of its eligible population.
- **Lack of awareness is a key barrier to participation.** A lack of awareness of low-income programs generates low participation rates by eligible populations. According to the report, the Metro ExpressLanes Low Income Assistance Plan struggled to reach a significant number of households due to lack of awareness of the program, and less than 0.5% of eligible households were enrolled with only 5-7% of program participants aware of the low-income program. On the other hand, very high enrollment can result in unmanageable program costs, so service provision must be balanced with resource allocation.

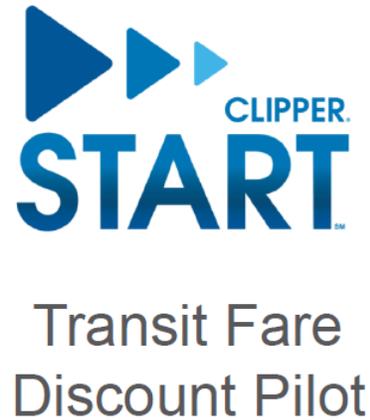
Bay Area Regional Transportation Affordability Programs

Clipper START Program

The Regional Means-Based Transit Fare Study discussed above led to the launch of the Clipper START program, the Bay Area's three year-pilot program for low Income transit discounts, in 2020.

The program goals are to:

- Make transit more affordable for transit reliant individuals earning low income
- Develop implementation options that are financially viable and administratively feasible.
- Move towards a consistent regional standard for fare discounts.



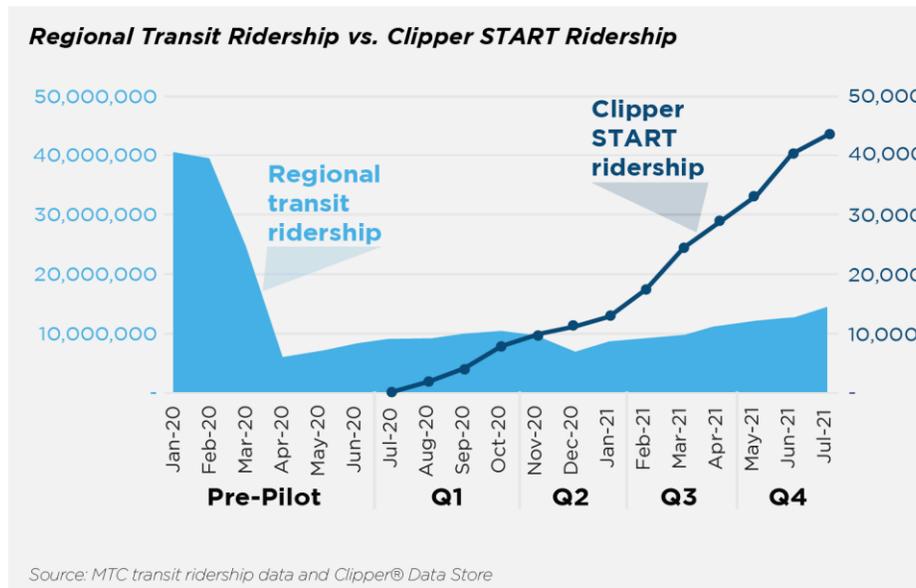
Twenty-one Bay Area transit agencies are participating in the program, which provides a 20 or 50% fare discount (depending on the operator) to individuals earning less than 200% of the Federal Poverty Level of household income. MTC is subsidizing the fares up to 10% and reimburses transit operator revenue up to 10% during the pilot. Participating operators are covering the remainder of the discount or any additional revenue losses from other sources. MTC is also covering the program administrative costs, with a total budget of \$3 million for a three-year program. Costs include eligibility verification (33%), marketing and outreach (32%), website and database maintenance (28%) and evaluation (7%). Community based organizations and social services agencies are assisting with promotion and enrollment.¹⁵

In March 2022, MTC published a Year 1 Summary Report outlining the pilot results to date. In the first year, 7,000 people applied for the program, 6,000 enrolled, and 4,000 were actively using the program. This represents a 3-10% program uptake among low Income transit riders. Enrollment was initially hampered by the COVID pandemic, but has been growing steadily, and increasing at a faster rate than ridership recovery in the Bay Area. The evaluation offered the following key findings:

- The program has high enrollment and verification rates in MTC's Equity Priority Communities, including the Concord/Antioch, Vallejo, the inner East Bay (Richmond, Oakland, Hayward, San Leandro), San Francisco, and San Jose.
- Applicants are hearing about the program most frequently through email/website, social media, transit advertisements and word of mouth.

¹⁵ March 2022: MTC Regional Means-Based Transit Fare Pilot Program (Clipper START) Year 1 Summary Report (July 2020 - July 2021)

- Most applicants (75%) said the application process was easy or very easy. Some focus group participants raised concerns about digital literacy and access to the program. Others had issues receiving their cards and consolidating accounts.
- Most applicants and users are very low Income, female, and Identify as Asian or Hispanic. This may be related to the fact that this demographic is over-represented among the "essential workers" who continued to travel during the pandemic. The program lessons learned suggest a need to refine marketing and engagement strategies to reach a broader spectrum of people.
- To date, the revenue Impact to transit operators has been low, with total transit operator program costs of about \$220,000 In discounted fares, after MTC reimbursements. This is due to lower than expected enrollment. MTC reported providing about \$70,000 In fare discount reimbursements.
- Mobility benefits of the program are difficult to assess given the Impacts of COVID-19, but available data suggests the program is allowing riders to expand their mobility by taking additional transit trips. Trip frequency increased over the duration of the program and focus group participants indicated the program has improved their mobility despite COVID limitations.



I-880 Express Lanes Toll Discount Pilot - "Express Start"

On June 22nd, 2022, the Bay Area Infrastructure Financing Authority (BAIFA) voted to implement a 12-month pilot program providing a 50 percent discount for low Income Individuals using the I-880 Express lanes. The FasTrak® Customer Service Center will activate the discount in the driver’s FasTrak® account, and all drivers in the eligible household who use the account will automatically receive the discount on future I-880 Express Lanes trips. The



program will use the same eligibility verification process and income threshold as the Clipper START program.¹⁶

FasTrak Equity Action Plan

The Bay Area Tolling Authority (BATA) developed an Equity Action Plan In 2021 to address concerns about equity impacts of toll penalties. Most recently, the Action Plan resulted in a reduction in penalties associated with toll violation notices for unpaid toll bridge crossings. Additional policy changes were approved by BATA at its November 2021 meeting, including dropping the cost of the FasTrak toll tag deposit for new customers who choose not to link their account to a credit card to \$5 from the previous \$20; crediting \$15 to the prepaid toll accounts of existing customers who paid a \$20 tag deposit; reducing the minimum opening balance for a FasTrak account for customers who pay with cash or check to \$25 from the previous \$50; and eliminating transaction fees for customers who replenish FasTrak accounts or pay violation penalties at a cash network location.



Treasure Island Toll Discount

Major new development is planned for Treasure Island in the San Francisco Bay. The Treasure Island Mobility Management Agency (TIMMA) plans to impose an Island access toll to manage new congestion associated with the development.

The TIMMA is developing an affordability program to address equity impacts of the toll and ensure affordable transportation access for low-income populations, especially residents of low-income housing which will comprise 25% of new units on the Island. The toll discounts are expected to include a 100% toll discount for current Treasury Island residents and low-income households (defined as those earning up to 55% of the Area Median Income (AMI), and a 50% discount for moderate income households (those earning between 55% and 120% of the AMI).¹⁷ Individuals do not need to live on Treasure Island to receive the discount. The AMI was selected as the income qualifier to align with the thresholds used by the San Francisco Office of Housing and Urban Development to qualify households for access to the low and moderate-income affordable housing to be offered on the Island.

The method for administering the toll discount is in development. TIMMA is seeking a means to qualify individuals for the discount and to link the discount to the FasTrak transponder used for tolls throughout the Bay Area. TIMMA staff noted that the agency lacks resources to conduct the income qualification process. Also challenging is the fact that the AMI is based on the county of residence, so the income required to qualify will differ for each applicant based on where they live.¹⁸

¹⁶ MTC Website accessed 5/27/22: <https://mtc.ca.gov/news/mtc-invites-residents-weigh-proposed-amendments-express-lane-toll-policies>

¹⁷ SFCTA website accessed 6/3/22 https://www.sfcta.org/sites/default/files/2022-01/TIMM_PIR_2021_2022-01-21.pdf

¹⁸ Conversation with TIMMA staff. 6/24/22

Low Income Parking Discount Programs

The following were identified as examples of programs to provide low Income discounts for parking:

- **Parking fine discount programs:** Several public agencies provide options for low Income people faced with parking citation, boot removal, or towing costs. For example, the San Francisco Municipal Transportation Agency offers low-income Individuals the option to enroll in a payment plan or perform community service In lieu of parking citations. They also receive an 80% discount on towing and boot costs. To qualify for the discounts, participants must provide evidence of already receiving low-Income benefits for another program (Medi-Cal or California Electronic Benefit Transfer card, Lifeline Card, or the Women, Infants and Children Supplemental Nutrition program), or must authorize SFMTA to verify receipt of Income eligible service from the San Francisco Department of Human Services.¹⁹
- **Residential Parking Program Discounts:** Some cities provide low-income discounts on residential parking. The city of Emeryville, CA, provides a 55% discount on the cost of residential monthly parking permits to low income households living in certain areas. They use the income threshold set by the U.S Department of Housing and Urban Development for a two person, very low-income household in Alameda County (\$52,200 in 2020). Prior year tax returns are required as proof of income.²⁰
- **Transit parking discounts.** Based on a review of the websites of several peer transit agencies with priced parking (WMATA, MBTA, LA Metro), these agencies do not offer any parking discounts. Many smaller transit agencies do not charge for their parking, eliminating the need for discount programs. Pierce Transit in Seattle planned a parking discount pilot program, but it was put on hold due to the COVID-19 pandemic. The program would have provided a 66% discount to low Income Individuals wishing to purchase monthly permit parking at the Tacoma Dome Station. Individuals would have qualified by presenting an Orca Lift discount card (King County Metro's discount card for low Income transit fares). Note that only 200 parking spaces at Tacoma Dome were to be sold through the monthly reserved permit program, and the remaining 2,200 spaces would continue to be offered free of charge.²¹

¹⁹ SFMTA Website accessed 5/18/22. <https://www.sfmta.com/reports/income-verification-form>; <https://www.sfmta.com/discounts-low-income-individuals-and-people-experiencing-homelessness>

²⁰ City of Emeryville website accessed 5/18/22. <https://www.ci.emeryville.ca.us/DocumentCenter/View/77/Parking-Permit-Information?bidId=>

²¹ Pierce Transit website accessed 5/18/22: <https://www.piercetransit.org/permit-parking/>