



Title VI Parking Policy Equity Analysis

2024 Parking Policy Rate/Price and Hour Extension

Office of Civil Rights | May 25, 2023



Discussion

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Background

- Jan 2019 – Parking Policy Update (Board Workshop)
- Feb 2020 – Parking Policy Update (Board Workshop)
- Mar 2022 – Board Requests Title VI Equity Analysis (Board Meeting)
- Nov 2022 – OCR Initiates Title VI Equity Analysis (Board Memo)
- Apr 2023 – Parking Policy Update (Board Meeting)
- May 2023 – Title VI Equity Analysis Board Approval (Board Meeting)

Overview

	Current	Proposed
Price Range		
Daily Fee <i>(per day)</i>	\$1 - \$3	\$3 - \$8
Single/multi-day <i>(per day)</i>	\$4 - \$7	\$4 - \$11
Monthly	\$63 - \$105	\$84 - \$220
Hours		
Until 3pm Weekdays	✓	✓
Weekends & 3-6pm Weekdays	✗	✓

*Rates may (1) vary by station and by time of day, day of week based on occupancy and
(2) increase up to 30% at a time / max every six months only when full
Adjust the floor for inflation along with fares beginning in 2025.*

Title VI Process: DI/DB Analyses Methodology

1. All Riders (Overall demographic) analysis (Analysis 1)
 - Compare those who drive to BART against overall BART riders.
2. Parking product type analysis (Analysis 2)
 - Compare the weighted average maximum parking price paid by protected parkers vs. total parkers using current maximums and proposed maximums.
3. Parking hour extension analysis (Analysis 3)
 - Compare the percentage of protected parkers who typically park when payment is not currently required vs. total parkers who park at these times.
4. Public Participation (Analysis 4)
 - The consideration of public input within the analyses to determine if there is an impact.

Title VI Process: DI/DB Analysis – All Riders (Analysis 1)

	Among Parkers*	Among All Riders
Minority	63%	67%
Non-minority	37%	33%

No disparate impact

	Among Parkers*	Among All Riders
Low-income	17%	29%
Non-low-income	83%	71%

No disproportionate burden

*Parkers make up about 24% of riders. Parkers are more likely to be non-minority and non-low-income compared to BART's overall ridership.

Source: 2022 Customer Satisfaction Survey

Title VI Process: DI/DB Analysis – Parking Product Type (Analysis 2)

Price Change Across All Parking Products

Protected Parkers vs. All Parkers

	Weighted Average Existing Maximum Parking Price*	Weighted Average Proposed Maximum Parking Price*	Percent Change	Impact/Burden (if greater than 5%)
Minority Parkers	\$3.28/day	\$8.24/day	151.3%	
All Parkers	\$3.37/day	\$8.33/day	147.5%	
			3.8%	Less than 5% No disparate impact
Low-Income Parkers	\$3.21/day	\$8.17/day	154.3%	
All Parkers	\$3.37/day	\$8.33/day	147.5%	
			6.7%	Greater than 5% Disproportionate burden

*Weighted Average Price across all parking products

Title VI Process: DI/DB Analysis – Parking Hour Extension (Analysis 3)

Across-the-Board Parking Hour Extension

How do you usually pay for parking at BART?	Minority	All Parkers	Low-Income
Not applicable - I usually ride BART after 3 p.m. or on the weekends when parking is free	4%	6%	6%

No disparate impact or disproportionate burden

*Note: as this is a single response question, this analysis is based on riders who *primarily* park after 3:00 pm or on weekends.

Title VI Process: Public Participation (Analyses 4)

- At-station outreach
- Informed parkers about the proposed policy changes and the Parking Policy Survey
 - Title VI/EJ & LEP Advisory Committees
 - LEP Serving newspaper ads
 - 6 at-station events
 - 1,269 survey responses received

4 **Vision Hispana**

LOCALES



iBART quiere escuchar tu opinión!

iBART está considerando la posibilidad de modificar su política de estacionamiento, incluyendo las tarifas y los horarios. Obtén más información y danos tu opinión tomando la encuesta en línea del 28 de noviembre al 16 de diciembre en bart.gov/parkingurvey.

Al final de la encuesta, puedes entrar en el sorteo de una tarjeta Clipper de \$100 para agradecer tu participación. Encuestas disponibles en varios idiomas en línea.

*Encuesta disponible en varios idiomas en línea.

Let's go. **ba**

La National Hispanic Health Foundation invita a las comunidades hispanas a no olvidar ponerse la vacuna de refuerzo contra el Covid-19

A través de recursos educativos y actividades comunitarias, la Fundación promueve la vacunación y difunde información confiable.

Las vacunas de refuerzo reducen los casos graves de Covid-19 y la mortalidad. Las vacunas de refuerzo son más importantes para personas que sufren de condiciones de salud pre-existent, ya que estas pueden agravar los síntomas y la probabilidad de muerte. Algunas de las condiciones más comunes son la hipertensión, la diabetes y las enfermedades cardíacas. Si tienes dudas acerca de tu historial de vacunación, condiciones de salud pre-existent o sobre los beneficios de la vacuna contra el covid, la NHHF te invita a acercarte a su centro de salud o farmacia local para obtener mayor información.

La National Hispanic Health Foundation es la rama educativa y filantrópica de la National Hispanic Medical Association (NHMA). A través de sus programas de actividades comunitarias y herramientas educativas en los Estados Unidos tienen información precisa así como acceso a la vacunación. Si deseas aprender más sobre el trabajo que hace la NHHF para mejorar la salud de las comunidades latinas, puede entrar a www.nhffoundation.org.

NHFF
National Hispanic Health Foundation

Mantenerte cerca de tus raíces hace que tu salud florezca.

El Center For Elders' Independence está aquí para ayudarte a florecer con nuestro plan de salud PACE, servicios personalizados que ayudan a las personas mayores a vivir seguros e independientes en casa, porque en casa es donde tu salud florece.

Las personas de 55 años o más, que viven con una condición de salud, pueden confiar en nuestros cuidados médicos, dentales y para la vista. Además, servicios adicionales como transporte, gimnasio, actividades en grupo y más. Todo sin deducibles.

CENTER FOR ELDER'S Independence
Your life just got better

Llama al 844-326-1150 o visita Elders.org y descubre si calificas para el plan PACE

www.bart.gov/BA

Title VI Process: Public Input Received

- Oppose:

- Minority: *"...if the parking fees went up dramatically it would no longer be competitive versus driving (for my commute and likely many others). At a certain point of increased costs I would return to driving in to work periodically, or frequently."*
- Low-Income: *"I am a minimum wage worker and the price of gas is hurting me financially so if the Bart fees for parking is raised this will indeed negatively impact my well being.."*

- Support:

- Minority: *"Those new proposed rates are still an absolute steal..."*
- Low-Income: *"I think that these changes are great because it disincentives driving and brings in more revenue for BART to work with..."*

- Miscellaneous/General Comments about BART:

- Minority: *"BART should be pushing to build housing on top of BART stations and getting people to avoid using single-occupancy vehicles for first-and-last-mile connections..."*
- Low-Income: *"Parking the way it is, is perfectly fine. Focus on other areas where Bart needs improvement, such as safety..."*

Title VI Findings: DI/DB Analysis & Proposed Mitigation (Analysis 2)

Parking Product	Existing Ceiling	Proposed Ceiling	Percent Increase	Proposed Ceiling with Mitigation	Percent Increase
Daily Fee	\$3.00/day	\$8.00/day	167%	\$6.30/day	110%
Monthly Reserved	\$105.00/month	\$220.00/month	110%	\$220.00/month	110%

- Low-income parkers are more likely to use Daily Fee than Reserved parking products.
- Lowering the Daily Fee rate ceiling allows the percent increases to be consistent across all parking products, to result in **no disproportionate burden**.

Motion

The Board of Directors approves the Title VI Parking Policy Equity Analysis.

Appendices

Appendix A – Protected Populations Parking Product Usage

How do you usually pay for parking at BART?	Minority	Low-Income	All Parkers
Number of respondents	384	76	722
Daily parking fee (e.g., \$3 at most stations)	91%	94%	88%
Monthly reserved parking (i.e., monthly permit)	3%	1%	6%
Single/multi-day reserved parking (purchase in advance on the Official BART app)	5%	5%	6%

Appendix B – Weighted Average Breakdown

	Daily			Monthly (daily rate based on 21 days/month)			Single/Multi Day			Average Fee		Percent Increase	Difference from Overall
	Existing	Proposed	Usage	Existing	Proposed	Usage	Existing	Proposed	Usage	Existing	Proposed		
Minority			91%			3%			5%	\$ 3.28	\$ 8.24	151.3%	3.8%
Low-Income	\$ 3.00	\$ 8.00	94%	\$ 5.00	\$ 10.48	1%	\$ 7.00	\$ 11.00	5%	\$ 3.21	\$ 8.17	154.3%	6.7%
All BART Parkers			88%			6%			6%	\$ 3.37	\$ 8.33	147.5%	

Disparate Impact or Disproportionate Burden
Does not exceed threshold
Exceeds threshold, but no impact
Exceeds threshold, and impact

Title VI Methodology & Equity Finding

- Equity Finding
 - **Disproportionate burden on protected parkers were found.**
- DI/DB Analysis
 - **No disparate impact** on minority parkers. **Disproportionate burden** on low-income parkers.
- Public Input Received
 - May indicate there is a risk of inequitable outcomes.



FTA Guidance & BART Parking Methodology

- BART considers providing parking itself to be an access amenity

Would Require Analysis	Would Not Require Analysis
<ul style="list-style-type: none">• Parking Fee Increase• Advanced Reserve Parking Fee• Purse/Wallet Feature (ex: introduction of a purse/wallet requirement)• Parking Payment Hours• Convenience Fees• Payment Types	<ul style="list-style-type: none">• Removal/Addition of Parking Spaces• Removal/Addition of Parking Fee Media• Parking Fee Platform Transfers• Parking Fee Decreases• Small Programs/Low Demand• West Oakland Exception• Parking Taxes or Fee Assessed• Parking Programs Administered by External Agencies



FTA Guidance & BART Parking Methodology

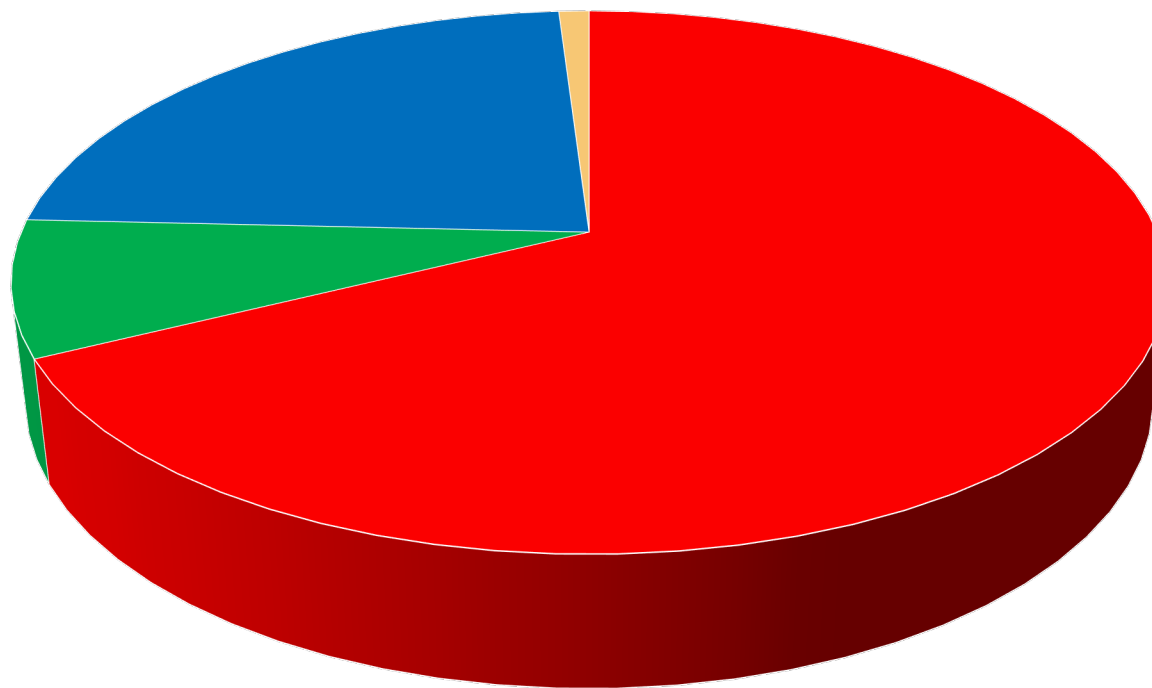
- FTA does not require equity analyses on parking and related operations
- However, FTA advises equity analyses on changes to customer's cost to access public transit
- BART considers parking as an access amenity
- BART created a methodology specifically for parking and Title VI analyses

Analysis Required - Examples	No Analysis Required - Examples
<ul style="list-style-type: none">• Parking fee increases• Parking payment hours• Convenience fees	<ul style="list-style-type: none">• Removal/addition of parking spaces• Parking fee decreases• Parking taxes or fees assessed



Title VI Process: Public Input Received (Parking Rate/Price)

Level of Support - Q9: “Do you support or oppose these proposed changes to BART’s **parking rates**?”



■ Total Oppose(Strongly + Somewhat) ■ Neutral ■ Total Support (Strongly + Somewhat) ■ Don't Know

*Note: Sample Size = 1,266

Title VI Process: Public Input Received

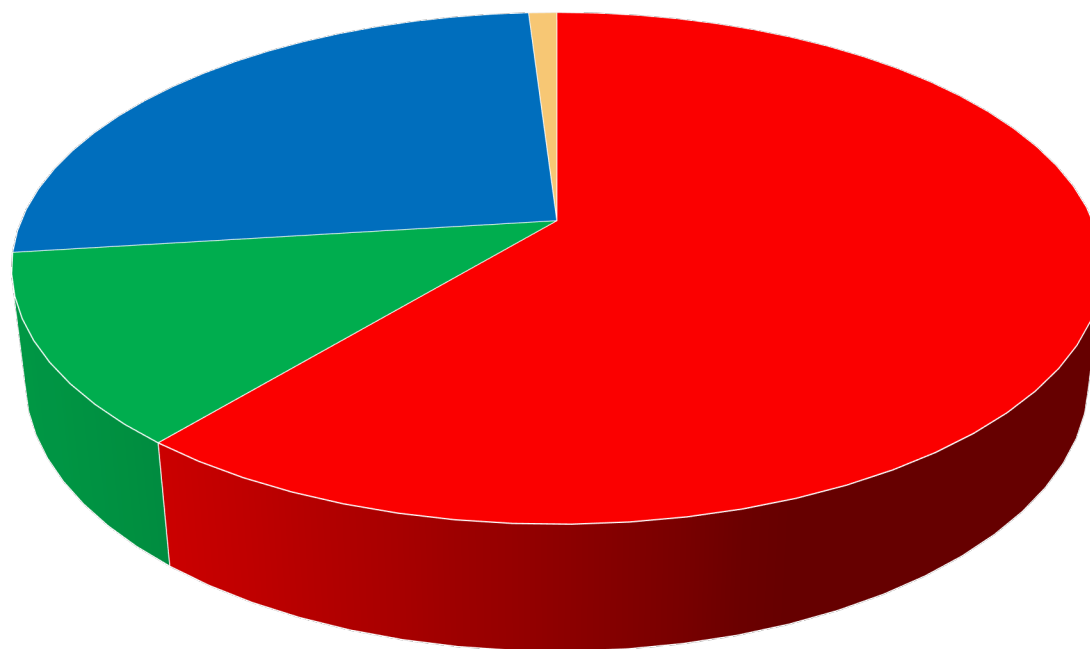
(Parking Rate/Price)

Q9: “Do you support or oppose these proposed changes to BART’s parking rates?”

	Total Oppose <i>(Strongly + Somewhat)</i>	Neutral	Total Support <i>(Strongly + Somewhat)</i>	Don't Know	Sample Size (n)
Minority	71%	8%	20%	1%	627
Non-Minority	61%	8%	30%	1%	507
Low-Income	70%	10%	17%	3%	152
Non-Low-Income	66%	8%	25%	1%	969
TOTAL	67%	8%	23%	1%	1,266

Title VI Process: Public Input Received (Hour Extension)

Level of Support - Q11: “Do you support or oppose BART **expanding the hours it charges for parking?**”



■ Total Oppose (Strongly + Somewhat) ■ Neutral ■ Total Support (Strongly + Somewhat) ■ Don't Know

*Note: Sample Size = 1,259

Title VI Process: Public Input Received

(Parking Hour Extension)

Q11: “Do you support or oppose BART expanding the hours it charges for parking?”

	Total Oppose <i>(Strongly + Somewhat)</i>	Neutral	Total Support <i>(Strongly + Somewhat)</i>	Don't Know	Sample Size (n)
Minority	64%	11%	24%	1%	626
Non-Minority	55%	14%	31%	1%	508
Low-Income	67%	8%	24%	1%	152
Non-Low-Income	59%	13%	27%	1%	969
TOTAL	61%	12%	26%	1%	1,259

Title VI Process: DI/DB Analysis – All Riders (Analysis 1)

Minority

	Among Minorities that Park	Among All Riders
Minority	63%	67%
Non-minority	37%	33%

No disparate impact

Low-Income

	Among Low- Income that Park	Among All Riders
Low-income	17%	29%
Not-low-income	83%	71%

No disproportionate burden

Parkers are more likely to be non-minority and non-low-income compared to BART's overall ridership.

Source: 2022 Customer Satisfaction Survey