

June 11, 2019

Board of Directors
San Francisco Bay Area Rapid Transit District
Oakland, CA 94604-2688

Re:

Item 4D: Participation in a Regional Means - Based Transit Fare Discount
Item 4E: Increase to the Per Trip Magnetic Stripe Ticket Surcharge

Dear Board President Dufty and Members of the BART Board of Directors,

SPUR is a member-supported nonprofit organization that promotes good planning and good government in the San Francisco Bay Area through research, education and advocacy. Improving public transit and increasing transit use in cities are core priorities for our organization.

We strongly encourage the BART Board of Directors to approve BART’s participation in the Regional Means – based Fare Discount Pilot Program. Access to transit is not merely a question service availability, but also the cost to ride. For most households in the Bay Area transportation is the third-biggest monthly expense, behind housing and food. When transit is out of reach, its promise — access to other people, goods, jobs, education, and opportunity — cannot be realized.

As detailed in our recently published report *Solving the Bay Area’s Fare Policy Problem*, we offer the following as suggestions to guide BART’s participation in the Means-based Transit Fare Pilot Program.¹

1. Prioritize evaluation and ensure the program is customer-centered.

Evaluation is critical to the long-term success of the Means-based Fare Program. If the pilot is to produce learnings that will inform the larger rollout, it’s important to understand how each aspect of the program — from outreach to enrollment to use— is received by users and non-users in addition to the participating transit agencies. Capturing the perspective of the user will allow BART and the other transit agencies participating in the program to understand what works, what doesn’t work and why, and adjust the program accordingly. The program must also prioritize user-experience. The low-income transit fare program needs to be easy to apply for, use, understand and renew. The pilot program should not add complexity to an already complicated fare landscape.

¹ Fleisher, Arielle, *Solving the Bay Area’s fare Policy Program*, 2019, spur.org/transitfares

2. Approve the program with the goal of deeper discounts and next steps toward integrated fares.

It is unclear if a 20 percent discount is enough to motivate people with low-incomes to enroll in the program. BART should consider the potential for deeper discounts in future iterations of the program.

Without any regional fare integration, people with low incomes who travel across counties will continue to pay more and struggle to afford transit. To truly guarantee a fair transit fare for people with low incomes, the larger inequity of a disjointed collection of fare policies and products needs to be addressed. MTC's initial program research found that the highest priority need for people with low-incomes is the high cost of multi-operator trips. Participants expressed strong support for a pass that included trips on different operators and for making transfers more affordable.² This need will not be met so long as there is no regional fare coordination. The transition to Clipper 2.0 is the optimal time for the region to rethink its approach to fares. BART should work in collaboration with MTC and other transit agencies to develop a roadmap to regional fare policy that corresponds with the design and development for Clipper 2.0.

3. Address barriers to Clipper adoption and seek to make Clipper a more useful product for people with low-incomes.

The means-based fare discount will only be available on Clipper. A key goal of the magnetic-stripe ticket surcharge increase is to incentivize Clipper use. For both these efforts to succeed, Clipper needs to be easy to access and use.

SPUR believes moving people to Clipper is a good goal. Maintaining two ticketing systems — Clipper and paper tickets — in parallel is very costly. For riders, Clipper allows for easier regional travel, convenience and cash savings. But currently, Clipper works best for commuters, higher-income earners and people willing to wade into the layers of complex and disjointed fares. Clipper masks, when it should work equally well for people of all income levels for all types of trips.

According to MTC's research, transit riders are choosing not to use Clipper because they don't understand what Clipper supports and offers: whether it calculates transfers and discounts, whether it works across systems and whether it holds cash as well as transit passes — shortcomings that are rooted in disjointed fare policy.³ SPUR's own research found that a key reason people with low incomes opt not to use Clipper and instead pay for transit with cash is to

² MTC, Regional Means-Based Transit Fare Pricing Study, Technical Memorandum #3: Evaluation of Alternative Means-Based Transit Fare Scenarios, Means-Based Appendix A: Focus Group Input on Discounted Fare Media Alternatives, 2016.

³ In 2018, the Clipper program conducted surveys to gauge customer satisfaction with Clipper and its features and to better understand the reasons why transit riders opt not to pay with Clipper. Notable findings from the survey of non-Clipper users include: 38 percent don't know if you can get a transfer with Clipper; 41 percent don't know if agencies offer a discount if you use Clipper; 30 percent don't know if Clipper is only for people who use monthly passes; 59 percent were more like to use Clipper after learning that you can load cash value and passes for multiple transit agencies on a single card; and 56 percent were more like to use Clipper after learning that Clipper automatically calculates the cost of your ride including discounts and transfers. See: Clipper Fall 2017 Survey Results; Carol Kuester, "Next-Generation Clipper (C2) Public Engagement," to Clipper Executive Board, 2018.

maintain control; the variety of price points can be challenging to manage, and there are few surprises when paying with cash.⁴

Thus far, BART's Clipper outreach has focused on distribution; this is necessary, not sufficient. To truly move the needle on Clipper adoption among people with low incomes, the complete set of barriers to Clipper adoption must be addressed. This includes not only addressing disjointed fares, but also the paucity of places to buy and add value to a Clipper card, especially in lower-income communities, as well as the minimum balance requirements. These requirements prevent low-income people from using Clipper because they make their money inaccessible and because they have to be mindful when switching operators as the balance requirements vary from one operator to the next.

4. Develop a complete strategy to address transit affordability.

By participating in the pilot program, BART can demonstrate its commitment to transportation equity. But the transit affordability burden is multifaceted; a means-based transit discount is an important, necessary effort, but on its own, it is not enough. BART is concerned with fare evasion and research shows that fare evasion is linked to transit affordability and complex and confusing fare payment systems.⁵ By developing a comprehensive transit affordability strategy BART can identify the full set of strategies it can employ to guarantee transit affordability while also addressing some of its fare evasion concerns. As part of the strategy, we recommend BART seek to understand the extent to which fare evasion correlates with poverty in the system. BART should also allow fare evaders under the poverty line to sign up for the means-based fare discount in lieu of a fine.

We appreciate the opportunity to provide comment. Please do not hesitate to reach out with any questions at afleisher@spur.org

Sincerely,



Arielle Fleisher
Transportation Policy Director

⁴ In 2017, SPUR, MTC and the Alameda County Transportation Commission partnered with the Haas School at UC Berkeley to host a case competition focused on the challenge "How might we increase mobility for low-income families through the Clipper card system?" The students interviewed transit riders with low incomes to understand their reasons for using and not using Clipper to pay for transit. Anxiety, vulnerability, stress and distrust when using Clipper emerged as common themes among the interviewees.

⁵ Perrotta, Alexis, How the Poor Afford Public Transportation: The Case of New York City, 2015, <https://academiccommons.columbia.edu/doi/10.7916/D8RN371W>