



June 29, 2005

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Manassas Park

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Margo T. Oge

U.S. Environmental Protection Agency

Office of Transportation and Air Quality (6401A)

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Dear Ms. Oge:

This letter is to update you on developments regarding the Best Workplaces for Commuters (BWC) in the Washington metropolitan region. A meeting was held on April 19, 2005 with the Commuter Connections Employer Outreach representatives, who are tasked with promoting the BWC program in the Washington metropolitan region, and on the agenda was the BWC program. The group considered the overall designation of BWC to be worthwhile and helpful in some of their efforts to sell alternative commuting options to employers for their employees. The observation was made by several outreach representatives that there is a lack of coordination with their efforts and those of the BWC staff. Further, the group mentioned that there is very little assistance or funding from the EPA to promote BWC. For example, one jurisdiction spent several thousand dollars on promotional materials and dedicated staff time to spread the word about the BWC program and special event, but there was minimal assistance from the EPA in these areas.

Many companies that are named on the BWC list are employers who have already had demand management programs in place, and some for a very long time. The group was concerned with the appearance that outreach was focused on those employers who are already implementing extensive programs instead of to employers whose programs are in the initial stages of achievement. The impression left is that the EPA is only recognizing employers who had already been offering alternative commuting options to their employees for quite some time.

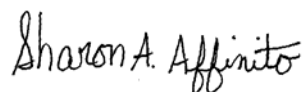
The matter of benchmarks for the BWC criteria was also of concern to the group. The four main BWC criteria, two of which are essentially the same, the transit benefit subsidy and the vanpool benefit subsidy, cancel out more than half of the employers that have vibrant and healthy commuting benefit options available to their employees. The apparent disregard for those employers who offer the transit benefit through a pre-tax vehicle is very disappointing. The standards of excellence that Commuter Connections uses takes into account many factors, of which pre-tax is one. Over sixty percent of the employers in the Commuter Connections Employer Services Program offer the pre-tax transit benefit. Standards of excellence are necessary for fineness, but should not exclude those employers embarking on great things relative to commuter benefits for their employees. Maybe these standards should be re-examined.

Evaluation of the BWC program, specifically maintaining a relationship with the employer, is too open-ended and there is no vehicle for verification. What resources is the EPA going to apply to keep track of employers in the BWC fold?

The group also felt that there needs to be a larger push for BWC on a national scale. The attractiveness of BWC can only increase with such exposure. The program is a good one, but the concerns mentioned above cast some doubt on the continuing partnership for the future.

Given the uncertainty with how the program is currently being operated in the Washington metropolitan region. Commuter Connections would like to initiate a serious dialogue with the EPA over the next year on how our concerns can be addressed both at a local and national level so that we can promote a BWC program. This will hopefully assist us to manage expectations in a better and more streamlined manner.

Best Regards,

A handwritten signature in cursive script that reads "Sharon A. Affinito". The signature is written in black ink and is positioned to the left of a vertical red line.

Sharon A. Affinito
Chair, Commuter Connections

cc: Connie Ruth
Donald Welsh, EPA Region 3
Robin Snyder
Stephen Sylvan
Steven Offut
Washington Region BWC Coalition Members