

A Department of the City and County of San Francisco

San Francisco Commuter Benefits Ordinance 2012 Annual Report

CommuteSmart

June 2013

EXECUTIVE SUMMARY

The San Francisco Commuter Benefits Ordinance reduces single occupancy vehicle (SOV) trips to and from San Francisco by encouraging the use of sustainable transportation modes. The Ordinance also furthers San Francisco's Transit First policy¹ contributing to greenhouse gas emissions reduction goals by reducing the number of SF commuters driving alone to work. The Commuter Benefits Ordinance, effective January 2009, covers businesses with 20 or more employees nationwide and a location in San Francisco.

The 2012 compliance cycle identified a number of positive conclusions and some areas for improvement in coming years.

- 1. **The Ordinance continues to influence the creation of commuter benefits programs**. The Commuter Benefits Ordinance successfully resulted in the adoption of benefits programs by 40 percent of businesses reporting during the 2012 compliance cycle, an increase of 3 percent from 2011.
- 2. Companies offer programs nationwide because of the Ordinance. Of these companies, one-third offer a commuter benefits program at all company locations nationwide, highlighting the strength of the Ordinance beyond the City of San Francisco.
- 3. **34** percent of San Francisco employees participate in commuter benefits. Participation varies slightly by company size. Of those businesses that implemented a commuter benefits program in response to Ordinance requirements, 22 percent of employees participate in the programs.
- 4. **Employers are increasingly offering multiple benefits**. 8 percent of businesses report offering employees both a pre-tax deduction benefit and an employer-paid subsidy benefit, an increase of 3 percent from 2011. However, the pre-tax deduction program remains the most popular benefit option with three-quarters of businesses offering it, while 12 percent offer a subsidy-only program.
- 5. Ordinance has resulted in decrease in carbon emissions from commute traffic. The reduction in commuter vehicles driving to and from San Francisco has reduced the carbon emissions attributed to commute traffic by an estimated 455,000 metric tons in 2011 and 2012. These findings show that the Commuter Benefits Ordinance is succeeding in meeting program and City goals. As improvements are made in the future will continue to

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^{1.} City of San Francisco, "Transit First Policy," 29 June 2012

increase the influence of the law, a further reduction in vehicle emissions from commute traffic can be achieved.

6. Ordinance continues to support increased use of sustainable transportation modes. Having a commuter benefits program in place provides employees with opportunities to increase use of a variety of commute modes. Thus, the Ordinance has been successful in increasing the number of San Francisco commuters walking, biking, taking transit and ridesharing decreasing driving alone rates.

Although the Ordinance has demonstrated significant results in the time that it has been in effect, there are aspects of the program that could be considered:

- 1. Campaign and Education. Data collected revealed that on average only 34 percent of employees are participating in commuter benefits programs. To some degree, company culture and support of sustainability and sustainable transportation modes directly translates into employee adoption of such practices and values. Encouraging overall transportation sustainability in employer consultations, by emphasizing other transportation program options available to employers, will help to introduce a well-rounded benefits package and culture at companies.
- 2. Coordination with SB 1339. State Bill (SB) 1339 authorizes the Bay Area Air Quality Management District (BAAQMD) and the Metropolitan Transportation Commission (MTC) to adopt a regional commuter benefit requirement. CommuteSmart will work with BAAQMD and MTC staff to share best practices and techniques for designing and implementing this legislation, and will coordinate with these agencies to ensure that employers comply with both local and regional requirements.
- 3. **Update training, outreach and enforcement materials**. Successful deployment of information about commuter benefits, Ordinance requirements and the compliance cycle is critical to increasing awareness of these programs. By updating and improving training and outreach materials, CommuteSmart can make program options and availability more easily understood and accessible.
- 4. **Communications**. Analyzing successful communications methods in notifying companies about the Ordinance and required compliance form proved that a combination paper mailing and email campaign has been most effective. Building on this knowledge will help in developing a more targeted outreach plan for future compliance cycles.

Overall, the Ordinance has clearly made a strong impact in the way that commuters travel to work in the city, making it less expensive and easier for San Francisco employees to choose a variety of sustainable commute modes.

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1. INTRODUCTION

1.1 SAN FRANCISCO COMMUTER BENEFITS ORDINANCE BACKGROUND

The 2011 American Community Survey stated more than 260,000 workers in San Francisco live outside the county and commute to the city.² San Mateo, Alameda and Contra Costa counties contribute the largest share of San Francisco workers.³ Of these workers, 10 percent reported a commute of 60 minutes or more.⁴ However, only 32 percent of those traveling to work in San Francisco take public transportation, 7 percent carpool, 10 percent walk and 3 percent bike while 38 percent drive alone.⁵ While just over half of commuters use a sustainable mode to travel to San Francisco, these figures estimate that more than 160,000 commuters drive alone to and within San Francisco each day, and more than half of these drivers are traveling in a short window between 7 a.m. and 9 a.m.

To reduce the number of commuters driving alone to San Francisco and greenhouse gas emissions, former Supervisor Mirkarimi introduced the Commuter Benefits Ordinance as an amendment to the San Francisco Environment Code, Section 4.6 The Ordinance requires San Francisco employers to offer commuter benefits to encourage employees to walk, bike, take transit and rideshare. The mandate passed with support from the San Francisco business community, including the Chamber of Commerce and the Building Owners and Managers Association of San Francisco (BOMA).⁷ The SF Board of Supervisors passed the San Francisco Commuter Benefits Ordinance on the first reading with 11 votes and zero dissents on August 8, 2008. The Ordinance became effective in January 2009 and applies to businesses with 20 or more employees nationwide and a location in San Francisco.

The overarching goal of the Ordinance is to decrease greenhouse gas (GHG) emissions by focusing on a reduction in single occupancy commute trips. The law accomplishes this by encouraging commuters to walk, bike, take transit and rideshare to work. The Ordinance furthers San Francisco's Transit First policy⁸ and is part of the Healthy Air and Clean Transportation Ordinance.⁹

http://factfinder2.census.gov/faces/tableservices/isf/pages/productview.xhtml?src=bkmk

^{2.} U.S. Census, "2011 American Community Survey," 13 March 2013

^{3.} Ibid.

^{4.} Ibid.

^{5.} Ibid.

^{6.} City of San Francisco, "San Francisco Environment Code Chapter 4: Healthy Air and Clean Transportation Program," 13 March 2013,

http://www.amlegal.com/nxt/gateway.dll/California/environment/environmentcode?f=templates\$fn=default.htm\$3.0\$vid=amlegal:sanfrancisco_ca\$sync=1

^{7.} Association of Bay Area Governments (ABAG), "Model Ordinance – Commuter Benefits," 13 March 2013, http://www.abag.ca.gov/abag/events/agendas/l111909a-ABAG Model Ordinance-Commuter Benefits.pdf
8. City of San Francisco, "Transit First Policy," 13 March 2013,

http://www.amlegal.com/nxt/gateway.dll/California/charter_sf/articleviiiathemunicipaltransportationag?f=templates\$fn=altmain-nf.htm\$3.0?f=templates\$fn=altmain-nf.htm\$3.0#JD_8A.115

^{9.} City of San Francisco, "San Francisco Environment Code Chapter 4: Healthy Air and Clean Transportation Program," 13 March 2013,

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1.2 ORDINANCE REQUIREMENTS

Under the Commuter Benefits Ordinance, employers have a few options when offering commuter benefits to their employees: a pre-tax employee-paid benefit, an employer-paid subsidy or an employer-provided transportation service. Any combination of the three is also eligible.

- **Employee-Paid Pre-Tax Deduction**: Employees have the option to set aside pre-tax funds from their paychecks each month for transit, vanpool or parking expenses. By doing so, taxable income is reduced, translating into travel savings for employees of up to forty percent, based on their income bracket. As a result, business payroll taxes decrease, with up to a nine percent savings per participating employee. Effective January 1, 2012, the IRS pre-tax limit was \$125 per month for transit and vanpool expenses and \$240 per month for parking expenses. Legislation passed in January 2013 retroactively raised both limits to \$245 per month.
- **Employer-Paid Subsidy**: Through this option, a business can subsidize employee transit, rideshare (carpool or vanpool) or bicycle commuting costs. Similar to the employee-paid pretax benefit, businesses do not pay payroll taxes and employees do not pay federal or payroll taxes on the benefit amount, up to the current IRS pre-tax limit. Subsidies are typically provided to employees in the form of a transit card or voucher. The value of the subsidy must be of equivalent value to the Muni Fast Pass 'A' (currently \$74), and may not exceed the current IRS pre-tax limits. Employers may also opt to provide a bike benefit of up to \$20 per month for employees.
- **Employer-Provided Transportation**: Employers may provide a transportation service using a dedicated bus or van, or paying into a shared bus service, between employee residential areas or transit stations and their office location(s).

Companies may qualify for an exemption to the Ordinance if they meet certain criteria. Businesses with fewer than 20 employees nationwide are not required to be in compliance. However, these businesses are encouraged to provide programs for their employees. Local, state and federal government agencies are also exempt. Other exemptions are provided on a case by case basis for companies with employees who solely telecommute, have contract work in San Francisco less than six months in duration or drive specialty vehicles to project sites.

1.3 BENEFITS FOR EMPLOYERS AND COMMUTERS

Businesses and employees both recognize savings and benefits as a result of commuter benefits programs.

Employees using pre-tax dollars to fund transit and vanpool expenses experience financial savings and pay less for their commute. In the case of employer subsidized transportation, their entire commutes may be free of charge. In addition to financial savings, employees using sustainable commute modes are often healthier and happier.

Businesses also experience tax savings with each employee participating in commuter benefits programs. Businesses realize benefits in terms of recruitment, retention and corporate citizenship as well. Just as employees benefit from health advantages, companies benefit as well through increased productivity, better morale and decreased health insurance claims and sick leave.

1.4 SAN FRANCISCO INDUSTRIES

While the types of businesses in San Francisco vary, some trends become apparent when looking at overall industry categories. Professional, scientific and technical services are currently the top industries employing workers in San Francisco, which include legal services; accounting, tax preparation and bookkeeping services; architectural and engineering services; and computer systems design. State and local government is the next largest employment sector in San Francisco, followed by the hospitality sector. Health care and social services and the finance and insurance industries were among the top industries in the city. ¹⁰

Technology companies comprise the majority of the industry share in San Francisco. Given the nature of this industry, the size of companies in this sector tends to range from very small start-ups to large corporations with thousands of employees nationwide. The influx of employees in this industry and in associated supporting industries has contributed to an increased share of the local economy.

- 2009-2011: Deduction limits for transit/vanpool and parking equal at \$230/month
- 2012: Without an extension to the parity provision, deductions for transit/vanpool dropped to \$125/month. Parking increased with inflation to \$240/month.
- 2013: Parity effective through January 1, 2014, and retroactive to January 1, 2012. Commuters are able to deduct up to \$245/month for transit/vanpool expenses and up to an additional \$245/month for parking expenses

Pre-tax funds can be used to purchase transit tickets and passes, load Clipper Cards and pay for vanpool expenses. The bike benefit is not yet included as an eligible pre-tax deduction and can be provided only as a subsidy capped at \$20 per month.

The 2013 legislation took an important step in recognizing the importance of sustainable commuting by re-establishing parity between sustainable commuting modes and parking. The legislation will be up for renewal at the end of 2013, and continuing this parity is essential to ensuring equal support of commuting modes. Additionally, including the bike benefit as a pre-tax deduction option in future years will create an environment where bicyclists are equally supported in their commute choices and can safely continue those choices using pre-tax dollars.

^{10.} California Employment Development Department Labor Market Information Division, "Labor Market Information for San Francisco,"19 June 2012, http://www.calmis.ca.gov/htmlfile/county/sanfran.htm

2. ADMINISTRATION OF THE COMMUTER BENEFITS ORDINANCE

CommuteSmart, an initiative of the San Francisco Department of the Environment, administers and enforces the Commuter Benefits Ordinance. The oversight of this program involves both annual compliance activities and on-going program management, monitoring and support.

CommuteSmart offers assistance and support to employers throughout the year via an email and phone hotline. Through these means, staff answer questions ranging from basic programmatic and procedural inquiries to requests for one-on-one consultations to develop and implement commuter benefits programs. Staff also investigate anonymous notifications of business noncompliance.

Annually, the CommuteSmart team administers the annual compliance cycle. This cycle includes developing the annual compliance form, conducting outreach about the Ordinance and any pertinent program updates, sending notifications to employers to complete the process, assisting employers with completing the form, reviewing the submissions and sending compliance certificates and non-compliance warnings to each company.

2.1 COMPLIANCE FORM PROCESS

Employers are asked to update CommuteSmart regarding their commuter benefits programs by submitting the compliance reporting form, due annually on April 30th. A copy of the 2012 compliance form is included in Appendix A. The form solicits information on the company's compliance status, commuter benefits currently offered, number of eligible employees in San Francisco and the number of employees participating in the program. Statistics for each question on the form are available in Appendix B.

Businesses reporting 20 or more employees and locations in San Francisco were notified of the 2012 annual compliance deadline through several communication channels, including a joint mailing with the Health Care Security Ordinance (HSCO), 11 links on the San Francisco Department of the Environment website, email, newsletter notifications and social media. The HCSO joint mailing was sent to more than 5,900 employers in San Francisco. In total, more than 3,400 compliance forms were submitted by December 31, 2012. Most employers completed the short compliance online though paper forms were accepted if internet access was not available.

2.2 OUTREACH AND COMMUNICATIONS

The CommuteSmart team undertakes many efforts to inform employers about the Ordinance and requirements through a variety of channels. In previous years this has been limited to one direct mailing to employers, general information on the SF Environment website and emails to businesses. Recently, CommuteSmart has attempted to increase the visibility of the program by including information in internal and external newsletters, postings via organizations catering to businesses

^{11.} City and County of San Francisco Labor Standards Enforcement, "Health Care Security Ordinance (HCSO)," 29 June 2012, http://sfgsa.org/index.aspx?page=418

and on social media platforms, including Twitter and Facebook. The goal of diversifying the outreach effort is to reach employers and expand knowledge and education of the Ordinance.

During 2012, the CommuteSmart team relied on more frequent email updates and Twitter posts to inform employers of upcoming deadlines, including the final deadlines for submitting compliance forms. Use of an email marketing service enabled the team to send large emails to an ever-expanding contact list of employers to convey deadlines and requirements. This service also enabled tracking of invalid email addresses, message open rates and requests to be removed from the email list.

As seen in Figure 1, nearly half of businesses reported hearing about the Ordinance and the annual reporting process via the joint mailing with the Health Care Security Ordinance. This beneficial collaboration is possible because the two ordinances share many of the same demographic requirements, including the size of businesses required to comply with each law. Furthermore, the annual compliance reporting deadlines are the same. The mailing includes a letter informing employers about the Ordinance, FAQs and the CommuterBenefits.org website address for accessing the compliance form. The mailer was sent to over 5,900 employers with San Francisco business registration certificate numbers and 20 or more employees nationwide based on a list compiled by the Office of the Treasurer and Tax Collector.

More than 80 percent of businesses heard about the Ordinance through e-mail or postal mail messaging campaigns.

Nearly 40 percent of employers reported hearing about the Ordinance through email, via multiple e-blast notifications sent to all employers who have previously submitted compliance forms. This number increased from the 2011 compliance cycle, indicating the rise in effectiveness of the targeted email campaigns. Very few employers heard about the Ordinance through other means, including social media, a new communications channel for CommuteSmart in 2012. Although few businesses reported notification through this means, the expanding opportunities in social media indicate that it is an area to focus on in future outreach processes.

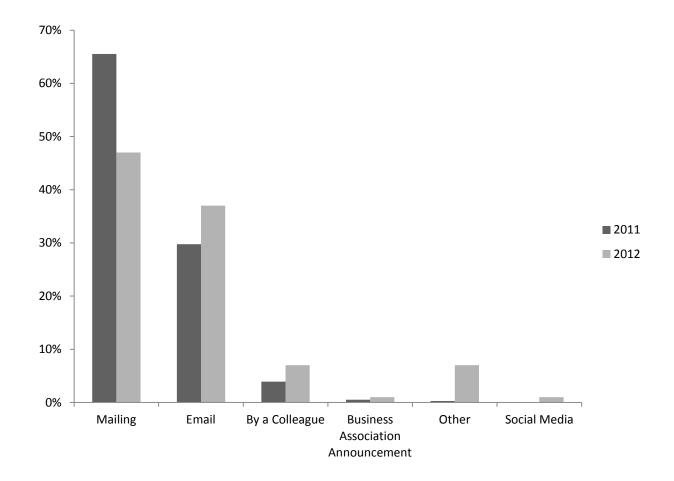


Figure 1. Notification Methods

n = 5,092

Of note is the increased number of employers reporting notification by a colleague to complete the compliance form. A secondary email campaign aimed at employers who had not submitted information was sent to contacts provided by the Office of the Treasurer and Tax Collector. Given that many of these contacts work as bookkeepers or accountants in the organizations, they sent the information to Human Resources and benefits colleagues to follow-through, thus increasing the number notified by this means.

The team offers a comprehensive employer guide on the department website and as a PDF to email to businesses that includes information about the Ordinance, specifics about the potential tax savings and other benefits for each program option. The guide features step-by-step instructions to determine the best commuter benefit option for the company, suggestions on staff and departments to involve in implementing a program and the process for registering employees once the program is in place. The document also includes a vendor directory, listing options for benefit providers based on the level of involvement the employer wishes to take in administering the program.

Other materials include sample surveys and marketing materials. The sample surveys assess employee commute patterns to help identify which benefit program would be the most effective for staff. The marketing materials include sample posters announcing the program and enrollment instructions, program marketing notices to slip in with paychecks and sample emails to send staff to

announce the program. These materials are included in the Employer Guide and are also available as customizable Microsoft Word documents on the SF Environment website for employers to use in their promotional activities. These materials are included in Appendix C.

CommuteSmart also offers support services, the most popular being one-on-one employer consultations. Through in person meetings or phone calls, CommuteSmart staff assists with determining the type of commuter benefit program to establish, and the necessary steps to implement the program.

2.3 COMPLIANCE TRENDS

Since implementation in 2009, the number of compliance forms received had steadily increased through 2011. In 2012, nearly 3,500 compliance forms were received by the end of the calendar year, a slight decrease from the more than 3,600 forms received in the previous year. This may be attributed to some not being aware that the form must be submitted annually regardless of previous submittals. This is also reflective of the targeted outreach to businesses that are subject to the Ordinance, and was not inclusive of employers with 20 or fewer employees. This may also simply indicate the continuing need for increased outreach and better notification strategies in future years.

Looking at this response rate as a percentage of the total notifications sent in the joint HCSO mailing, approximately 59 percent of businesses submitted a compliance form, down from 64 percent in 2011.

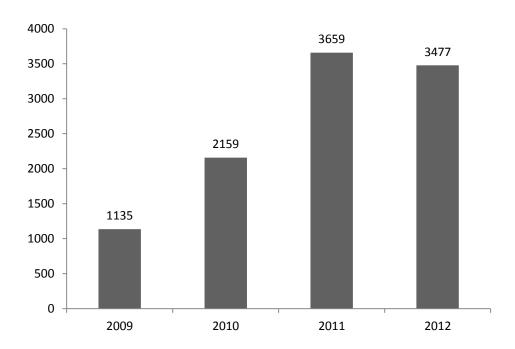


Figure 2. Compliance Forms Filed by Year

3. COMMUTER BENEFITS COMPLIANCE REPORTING RESULTS

In 2012, the Commuter Benefits Ordinance continued to influence businesses to implement commuter benefits programs both in San Francisco and beyond the city's boundaries. 40 percent of businesses reported adopting a benefits program because of the Ordinance, an increase of 3 percent from 2011. Of these companies, one-third chose to offer commuter benefits at all company locations, highlighting the strength of the Ordinance beyond the City of San Francisco. The Ordinance has also resulted in an estimated carbon emissions reduction nearly 200,000 metric tons in 2012. While a decrease from 2011, this may be attributed to fewer businesses reporting in this year.

Overall, 34 percent of all eligible employees participate in commuter benefits through their company, an increase of four percent from 2011. The Ordinance has very clearly made a strong impact in the way that commuters travel to work in the city, making it less expensive and easier for San Francisco employees to choose sustainable commute modes rather than driving alone.

3.1 ROLE OF THE ORDINANCE IN STARTING BENEFITS PROGRAMS

Forty percent, or more than 1,200 companies, reported implementing a commuter benefits program as a result of the Ordinance, while the remainder offered a program independent of requirements. The companies that began a program in response to the Ordinance reported approximately 9,500 employees participating in the programs offered, resulting in a reduction of just over 300,000 vehicle miles traveled each day.¹²

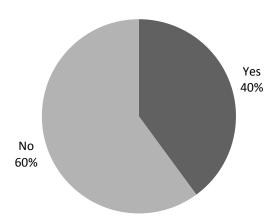


Figure 3. Programs Initiated due to Ordinance

n = 3,028

^{12.} Based on average 16 mile one-way commute (from MTC's Commute Profile). Just over half of San Francisco's employee base live and work in San Francisco based on the 2000 U.S. Census. The remaining employees commute to San Francisco from other counties, primarily Alameda, San Mateo, Contra Costa and Marin Counties. These four counties contribute nearly 225,000 employees to San Francisco's labor force, and the long commutes from these residential areas contribute to this average one-way commute data. Labor Market Information Division: California Employment Development Department, "San Francisco County to County Commuting, 10 July 2012, http://www.calmis.ca.gov/file/commute-maps/sanfrcommute.pdf

Of the companies initiating a commuter benefits program to comply with the Ordinance, one-third reported offering these benefits to all employees nationwide. While this percentage is slightly less than the 37 percent reporting company-wide programs in 2011, nearly 400 companies have gone beyond the legal requirement to offer commuter benefits to all employees. As in 2011, this continues to indicate the ability of the Ordinance to enhance employee benefit access beyond San Francisco.

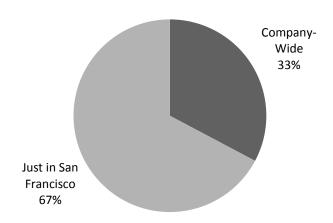


Figure 4. National Extent of Commuter Benefits Programs Initiated Due to Ordinance

n = 1,209

3.2 COMMUTER BENEFITS PARTICIPATION RATES IN SAN FRANCISCO

The compliance form asks the number of San Francisco employees eligible for and the number participating in a commuter benefits program. Employee eligibility encompasses all full-time employees, part-time employees working an average of ten hours per week, and temporary employees working for compensation for six months or more.

Overall, 34 percent of San Francisco employees participate in commuter benefits.

Of all employees eligible for their company's commuter benefit programs, 34 percent participate. As demonstrated in Figure 5, the average participation rate varies only slightly by company size. Companies with fewer than 500 employees reported slightly higher participation rates than companies with 500 to 5,000 employees. This is a noticeable change from the participation rates reported in 2011; in the previous year, companies with fewer than 100 employees boasted a much higher participation rate than larger companies. In 2012, the participation rate has leveled out over the different employer sizes.

Very large companies (5,000 or more employees), have the lowest participation in commuter benefits programs among eligible employees, averaging a one-fifth participation rate. This data indicates very low usage of the commuter benefits programs available, and also identifying the types of companies for more targeted outreach to increase the use of sustainable commute modes.

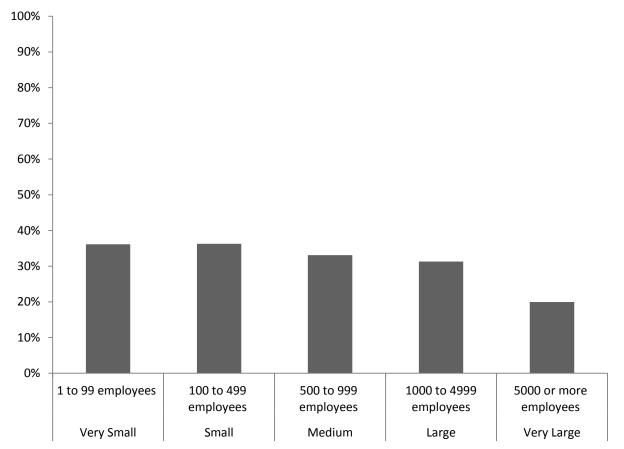


Figure 5. Average Participation Rate by Company Size

n = 3,028

On average, companies reporting programs that began in response to the Ordinance requirements had a 22 percent participation rate. This indicates that while the Ordinance has been successful in encouraging employers to offer commuter benefits, implementation of these programs does not lead to employees being aware of or using the benefits. This presents an opportunity for working with employers to market the program and help employees understand the benefit available.

Low participation in commuter benefits programs may be attributed to a number of factors, particularly the location of the business with respect to transit services. If the employer is not located near convenient regional transit service, the rate of participation in programs reducing the cost of transit is not likely to be high. Additionally, the availability of free parking is a barrier to using sustainable modes and another prospect for outreach and improvement.

Company culture plays a large role in the use of sustainable commute modes. Companies that make sustainable transportation modes the norm are more likely to appeal to and encourage employee participation. For example, employers can offer company vehicles or bicycles, or pay the cost of car sharing for business travel to negate the need for employees to drive their personal vehicle to work. Other companies require employees to purchase parking passes rather than offering free parking, creating an incentive to rideshare or use other modes to travel to work. These actions can be further incentivized by parking cash-out programs, whereby employees who choose not to purchase a parking permit receive a cash payment in lieu of free parking. Employers may also create an

encouraging environment for choosing sustainable commute modes by providing the option for a flexible work schedule and enrolling in the San Francisco Emergency Ride Home program.

3.3 ESTIMATED EMISSIONS REDUCTION

One of the primary goals of the Commuter Benefits Ordinance as a part of the Environment Code is to reduce air pollution from single occupancy vehicles. The City of San Francisco has committed to reducing carbon emissions to 25 percent below 1990 levels by the end of 2017, and by 80 percent by 2050. The efforts of the Commuter Benefits Ordinance will help the City to achieve its air pollution and greenhouse gas reduction goals by encouraging reduction in drive alone commuting.

With the data collected during the 2012 compliance cycle, and the use of some basic assumptions,

an estimate of greenhouse gas reductions can be calculated. Based on the number of employees participating in commuter benefits programs in the city, and an average commute distance of 16 miles one-way, ¹³ an estimated vehicle miles traveled (VMT) reduction was determined. This assumes all participants in a commuter benefits program are no longer driving alone, and are taking transit, vanpool or a company shuttle.

Taking the average 23.8 miles per gallon (MPG) fuel efficiency for passenger vehicles, 14 the average gallons of gas saved is calculated. This calculation can then be applied to determine the amount of CO_2 emissions those gallons of gas would have produced, which can be used as a proxy for the CO_2 emissions reduction as a result of the

San Francisco commuters participating in commuter benefits reduced CO₂ emissions by an estimated 200,000 metric tons in 2012.

Ordinance. These calculations estimate a reduction of 831 metric tons of CO_2 per standard commute day. Assuming an average of 240 commute days per year, 15 this translates into an overall estimated reduction of nearly 200,000 metric tons of CO_2 this year. This figure is slightly less than the estimated reduction of 255,000 metric tons in 2011, as expected with a reduced number of compliance forms received. However, when looking at the two years as a sum, the Commuter Benefits Ordinance has contributed to a reduction of approximately 455,000 metric tons of CO_2 since 2011, constituting a significant step towards the City's overall emissions reduction goals.

Table 1. Emissions Reduction Calculations

Number of benefit program participants	69,267
Average commute distance	16 mi. one-way
Average daily VMT Reduction	2,216,544 miles (round-trip)
Average gallons of gas saved	93,132 gallons
Total daily reduction in CO ₂	831 metric tons
Total annual reduction in CO ₂	199,377 metric tons

^{13.} Based on average 16 mile commute one-way (from MTC's Commute Profile).

^{14.} Bureau of Transportation Statistics Research and Innovative Technology Administration, "Average Fuel Efficiency of U.S. Light Duty Vehicles," 20 June 2012,

http://www.bts.gov/publications/national transportation statistics/html/table 04 23.html

^{15.} BAAQMD, "Appendix G: Information for Cost-Effectiveness Worksheets, 28 June 2012,

http://www.sfcta.org/images/stories/Programming/tfca/FY1213%20Call/tfca fy 1213 local expenditure criteria info%20for%20website.pdf

3.4 NUMBER OF NATIONWIDE EMPLOYEES

Both nationwide and local employee counts are tabulated in the compliance form. Nationwide employee count is essential in determining compliance, and also helps to identify the range of company sizes with a local presence in San Francisco. As seen in Figure 6, the majority of companies (54 percent) have fewer than 100 employees nationwide. In line with this, companies

The majority of companies in San Francisco are small businesses with fewer than 100 employees nationwide.

employing fewer than 500 employees nationwide comprised more than three-quarters of the companies housed in San Francisco.

These tabulations are comparable with the data from 2011, although the overall percentage of very small businesses reported has decreased nearly 10 percent. This may be attributed to the reduction in total compliance forms filed

Only six percent of companies with locations in the city have 500 to 999 employees. However, the number of large and very large companies is slightly higher, at ten and eight percent respectively. This highlights the draw

of San Francisco as an economic base for larger companies, particularly in the finance and technology sectors, and these percentages are slightly higher than in 2011, indicating additional larger companies may have moved to the City or have begun to report their activities.

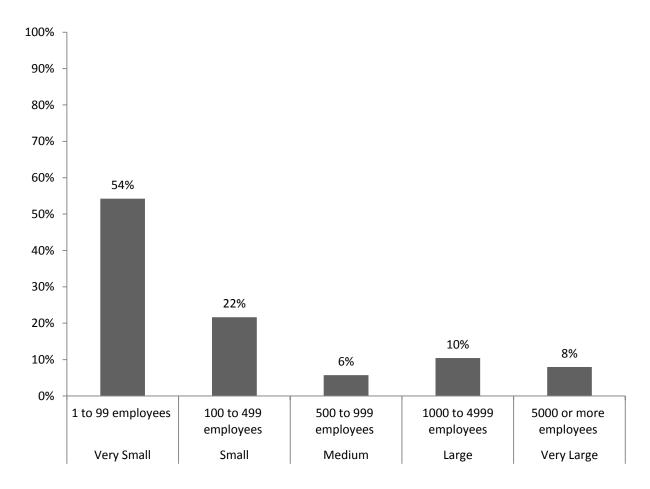


Figure 6. Company Size Distribution

n = 3,295

3.5 BENEFITS OFFERED

Companies have the option of offering a pre-tax employee deduction, employer-paid subsidy or employer-provided transportation service to employees to satisfy the requirements of the Ordinance. Most businesses opt to offer one program, while some offer a variety to match employee preferences.

Figure 7 captures the variety of benefit options offered to employees, including those that offer a combination of two or three benefits. More than three-quarters of businesses offer just the pre-tax transit/vanpool deduction benefit to employees. This option is similar to other pre-tax programs that may already be offered (including flexible spending accounts), lending to the high percentage of employers offering this option. This percentage is decreased slightly from 2011, where nearly 80 percent reported offering this option.

12 percent of businesses offer employer-paid subsidies, wherein employers pay at minimum \$74 towards employee travel expenses per month. The regulations and set up for this option are more difficult for employers to understand, given the Ordinance requirement for subsidy amount and how to offer the paid subsidy to employees while maintaining adherence to IRS guidelines. Many employers express a desire to simply reimburse employees for travel costs, but IRS regulations limit this option. This analysis identifies a program area where efforts can be targeted to increase awareness about subsidy options and their potential tax savings, including expanding and simplifying the step-by-step guide for setting up subsidy program to increase the number of employers offering this option.

Nearly 80 percent of San Francisco businesses offer a pre-tax deduction program for employees.

Just over one percent of employers offer a shuttle service for employees, an increase from the 2011 compliance cycle. Given the cost of the program and the size of the employee base necessary for cost-effectiveness, the low number of employers offering this benefit is expected. Given this, an increase in employers offering this option is impressive to note.

An increased number of employers have opted to provide a combined pre-tax and subsidy program in 2012, with eight percent choosing this option in comparison to only five percent in 2011. In this case, an employer offers employees a small subsidy for transportation costs, and offers a pre-tax program cover additional travel costs. Nearly all employers offering a shuttle program also provided a pre-tax option, likely to cover any groups of employees not served by the shuttle. A small number of employers offer all three program options.

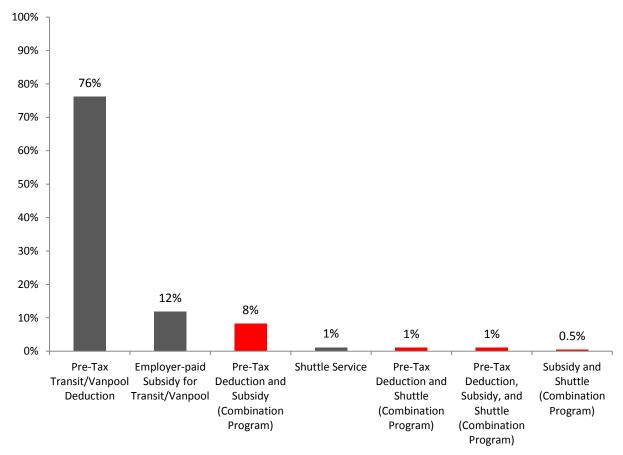


Figure 7. Benefit Options Offered

n = 2,873

Figure 8 suggests the popularity of offering the pre-tax option is not dependent on the size of the business, given most employers chose to offer this option. This analysis proved true for 2011 as well, indicating overall employer preference for this program and highlighting an opportunity to enhance communications about other compliance options. Companies with fewer than 100 employees offered a subsidy at a slightly higher rate than other company sizes, also continuing a trend seen in 2011. This may be due to a variety of factors, including the ability of companies with fewer than 100 employees to offer this benefit cost-effectively, and the desire to recruit talented employees with a competitive benefits package in order to grow.

In 2011, companies with more than 500 employees were more likely to offer shuttle programs than smaller businesses. In 2012, data showed a marked increase in small businesses offering this option. While a dedicated shuttle program is expensive and likely more successful at a larger company with a broader employee base, the increasing opportunity for shared shuttle service in San Francisco may make this option easier for smaller businesses. With this option, businesses may purchase a share in a shuttle, or simply purchase seats for their employees, thus making it possible to offer this personalized option at a much feasible price point.

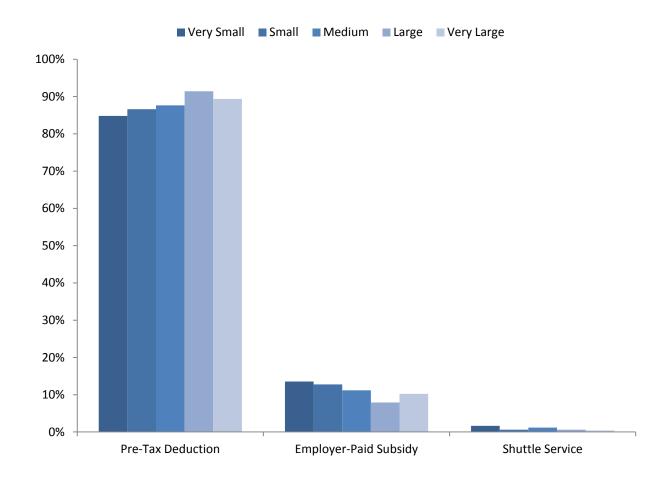


Figure 8. Benefits Offered in Relation to Company Size

n = 2,864

3.6 VENDOR ADMINISTRATION FOR BENEFITS PROGRAMS

Vendors assist with administering commuter benefits programs, including making deductions, distributing fare media and providing customer service to participants. Vendors typically charge \$5 or less per participant per month, depending on services provided and the number of employees participating.

Many vendors offer different programs based on the level of time or financial commitment employers are willing to make, customizing options that range from very low-cost programs with active employer management to more comprehensive programs with minimal employer involvement.

In completing the compliance form, businesses were asked if they were using a vendor to administer the program. The responses, tabulated in Figure 9, indicated that the use of these vendors has increased in 2012, with nearly 60 percent of businesses reportedly working with a vendor. In 2011 only 50 percent of businesses noted that they have worked with a vendor. Most businesses should be utilizing this service to ensure their benefits program is in line with IRS requirements. While an improvement from 2011, this represents another opportunity for outreach and education to employers.

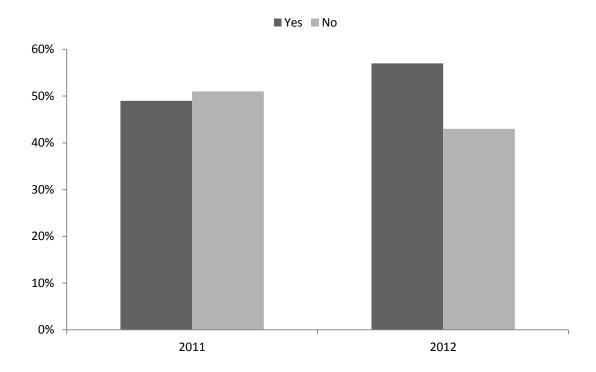


Figure 9. Vendor Administration

n = 5.822

In small companies, administering the program in-house is a good option to keep costs at a minimum. Administration of the program includes taking orders from employees, setting up deductions (in the case of pre-tax programs) and answering employee questions. The vendor works with the employer to simply provide the benefit to employees. For larger companies, these activities would likely become too resource intensive unless a staff person is dedicated to program administration. 80 percent of very large employers use a vendor for comprehensive program administration, and only 40 percent of very small companies make the same choice, as shown in Figure 10. This trend is in keeping with the 2011 data, although use of vendors by companies with fewer than 500 employees has increased in 2012.

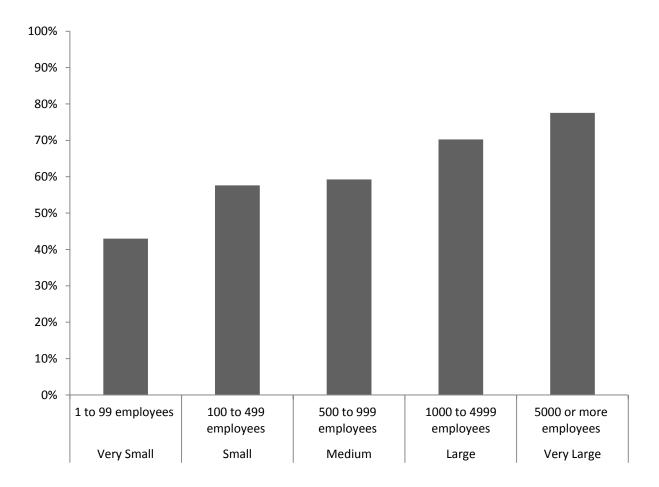


Figure 10. Use of Vendors by Company Size

n = 3,028

4. CONCLUSION

The 2012 compliance cycle identified a number of very positive conclusions, encouraging improvements from 2011 and some areas for development in coming years. Overall, the results demonstrate that the Ordinance has continued to succeed in urging a substantial number of companies to offer a commuter benefits program. Having the program in place provides employees with an important benefit to support the use of sustainable transportation modes. With a continued increase, the reduction in commuter vehicles driving to and from San Francisco has summarily reduced the greenhouse gas emissions attributed to commute traffic by an estimated 831 metric tons per day in 2012. By these metrics, the Commuter Benefits Ordinance has been successful in meeting the program goals, and will continue to increase the influence of the program in effecting mode change in San Francisco.

4.1 AREAS FOR FUTURE IMPROVEMENT

Although the Ordinance has demonstrated significant results in the few years that it has been in effect, there are aspects of the program that could be considered:

- 1. Campaign and Education. Data collected revealed that on average only 34 percent of employees are participating in commuter benefits programs. To some degree, company culture and support of sustainability and sustainable transportation modes directly translates into employee adoption of such practices and values. Encouraging overall transportation sustainability in employer consultations, by emphasizing other transportation program options available to employers, will help to introduce a well-rounded benefits package and culture at companies. These values will directly affect employees, and help them to think about their transportation choices while at work and at home, ultimately leading them to choose more sustainable options for their commute and work trips.
- 2. **Coordination with SB 1339.** State Bill (SB) 1339 authorizes the Bay Area Air Quality Management District (BAAQMD) and the Metropolitan Transportation Commission (MTC) to adopt a regional commuter benefit requirement. The legislation, largely modeled on the San Francisco Commuter Benefits Ordinance, will target employers with 50 or more full-time employees in the nine-county Bay Area, including San Francisco. As such, those employers required to comply with the regional bill are already required to offer these benefits to their San Francisco employees under the San Francisco Ordinance. CommuteSmart will work with BAAQMD and MTC staff to share best practices and techniques for designing and implementing this legislation, and will coordinate to ensure that employers comply with both local and regional requirements.
- 3. **Enforcement**. In 2012, CommuteSmart staff updated procedures and timelines to provide additional detail on enforcement procedures. The enforcement serves to encourage companies to comply with the provisions of the law and provide a required and important benefit to their employees.

4. **Update training and outreach materials**. Successful deployment of information about commuter benefits, Ordinance requirements and the compliance cycle is critical to increasing awareness of these programs. By updating and improving training and outreach materials, CommuteSmart can make program options and availability more easily understood and accessible.

For the 2013 compliance cycle, CommuteSmart has begun to update and improve collateral for SF commuters and SF businesses, creating new brochures with clear, easily understandable information about our programs. The Employer Guide has been updated to include more information about each program option, and the step-by-step guidance is improved to be more clear and easy to follow.

The Commuter Benefits website will be updated before the 2013 compliance cycle to be easy to navigate and contain more relevant, educational information about the program. This includes frequently asked questions, materials available for download, and new training presentations to help employers understand the Ordinance and complete the compliance form. As a whole, the Commuter Benefits website will be refreshed to offer more clear information, FAQs to assist employers in understanding the requirements and easily accessible supporting documents.

5. Communications. Analyzing successful communications methods in notifying companies about the Ordinance and required compliance form proved that a combination paper mailing and email campaign has been most effective. Building on this knowledge, and knowing the other, less effective, forms of communication, may help in developing a more targeted outreach plan for future compliance cycles. In lieu of diffusing efforts across a number of communications methods, focusing on a more frequent email campaign, more robust website linked from that email (as described above), and a mailing including all businesses required to comply may help in increasing the number of compliant companies and thus the impact of the Ordinance in reducing vehicle trips.

As mentioned previously, CommuteSmart partnered with the Health Care Security Ordinance to conduct a very successful joint mailing to notify companies of upcoming reporting deadlines. The data confirms that this has been an effective way to reach businesses. However, efforts to reach all businesses required to comply with the Ordinance via electronic means need to be enhanced. Obtaining a full list of all businesses that have 20 or more employees nationwide and a presence in San Francisco will result in the ability to contact all of those employers directly via e-mail to educate them about the Ordinance, offer assistance in implementing benefits programs, if needed, and share information about how to complete the annual compliance form. This will result in increasing the number of employers aware of the Ordinance, and in effect increase the number of employees who have access to benefits to make sustainable modes less expensive and more appealing for their commute.

APPENDIX A - 2012 COMPLIANCE FORM

San Francisco Commuter Benefits Ordinance 2012 Compliance Form

The Commuter Benefits Ordinance requires San Francisco businesses with 20 or more nationwide employees to offer one of the following benefits to their San Francisco employees:

- 1. A monthly pre-tax deduction, up to \$125/month, to pay for transit or vanpool expenses.
- 2. A monthly subsidy for transit or vanpool expenses equivalent to the value of the San Francisco Muni Fast Pass (including travel on BART), currently \$74/month.
- 3. Shuttle service on a company-funded bus or van between employee home and place of business.

All businesses subject to the Ordinance should fill out a Compliance Reporting Form by April 30, 2013.

Please complete form online at <u>www.commuterbenefits.org</u>, or submit completed paper form:

- By email to <u>commuterbenefits@sfgov.org</u>
- By fax to (415) 554-6393
- By mail to 11 Grove St., San Francisco, CA 94102

If you have any other questions about the 2012 Compliance Reporting Form or need assistance complying with the Ordinance, please call (415) 355-3727 or email CommuteSmart@sfgov.org.

Required questions are marked with a *. Incomplete forms will not be accepted.

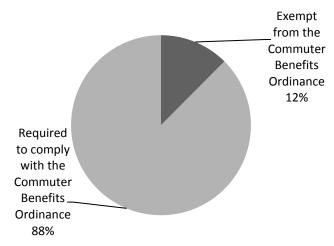
		-•		
Employer Information				
Business Registration Certificate Number (Must be 6 digits):*				
Business Name:* Business Website:				
Business Street Address (Headquarters):*				
Business Suite/Floor (Headquarters):*				
Business City (Headquarters):*	· · · · · · · · · · · · · · · · · · ·	D : 7: 0	1 11 1	
Business State/Province/Region(Headquarters	<u>):*</u>	Business Zip C	ode (Headquarters):*	
Nationwide Employee Count:*	T			
Contact Name:*		ct Title:*		
Contact Email:*	Conto	ct Phone Numb	er:*	
Program I	nforma	ation		
This business is:* □ Exempt from the Commuter Benefits Ordinance □ Required to comply with the Commuter Benefits Ordinance				
My business offers Pre-Tax Transit/Vanpool Deductions:*		□ Yes □ No		
My business offers an Employer-Paid Subsidy for Transit/Vanpool:*		□ Yes □ No		
My business offers an Employer-Paid Subsidy for Bicycle Maintenance:*		☐ Yes ☐ No		
My business offers an Employer-Paid Shuttle Service:*		☐ Yes ☐ No		
Did you start your commuter benefits program because of the Commuter Benefits Ordinance?*		□ Yes □ No		
Is your commuter benefits program:*			□ Company-Wide □ Just in San Francisco	
Did you begin offering your commuter benefits wide because of the Ordinance?*	s progr	am company-	□ Yes □ No	
Do you use a third-party vendor to help you administer your program?*		□ Yes □ No		
As of today, how many San Francisco employ	ees are	e eligible for		

your commuter benefits program?*					
As of today, how many San Francisco employees are participating in your commuter benefits program?*					
Any additional information you would like to include:					
How were you notified to fill out the Compliance Reporting Form?* □ Email from the Department of the Environment					
☐ Mailing about the Commuter Benefits and Healthcare Ordinances					
☐ By a colleague at my organization					
☐ Business association announcement☐ Social Media					
☐ Other:					
Would you like to be added to our email list to receive periodic updates on the Commuter Benefits Ordinance, transit changes, and other San Francisco transportation news?*	□ Yes □ No				
Do you have any further questions about the Ordinance? Include your question(s) below					
and Department of the Environment staff will contact you.					
By signing this verification, I certify that the information on this Compliance					
Reporting Form is accurate and true to the best of my kn	lowieage.				
Signed by:	Date:				
Signature:					

For more information on the Commuter Benefits Ordinance, please visit www.commuterbenefits.org or contact the San Francisco Department of the Environment at (415) 355-3727 or commuterbenefits@sfgov.org.

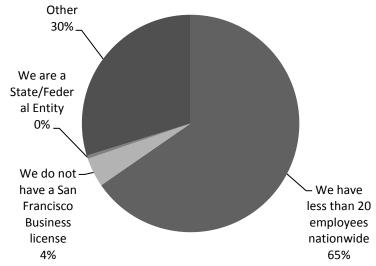
APPENDIX B - RESULTS BY QUESTION

Nearly 90 percent of businesses reporting were required to comply with the Ordinance and to submit a compliance reporting form for 2012. Many companies exempt from the Ordinance do not submit a form, thus the overall percentage of exempt businesses may be higher than reported. This low number of businesses claiming exemption may also indicate more successful education about exemption categories, eliminating some businesses from falsely reporting exemption status.



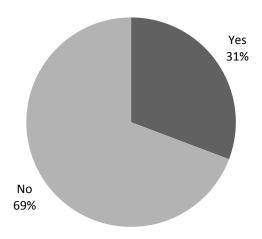
Question 1: This business is a) Exempt from the Commuter Benefits Ordinance or b) Required to comply with the Commuter Benefits Ordinance. n=3,314

More than half of businesses claiming exemption reported fewer than 20 employees nationwide. Nearly one-third of businesses noted 'Other' and reported reasons including contractor status or not having a location in San Francisco.



Question 1a: How is your business exempt from the Ordinance? n = 413

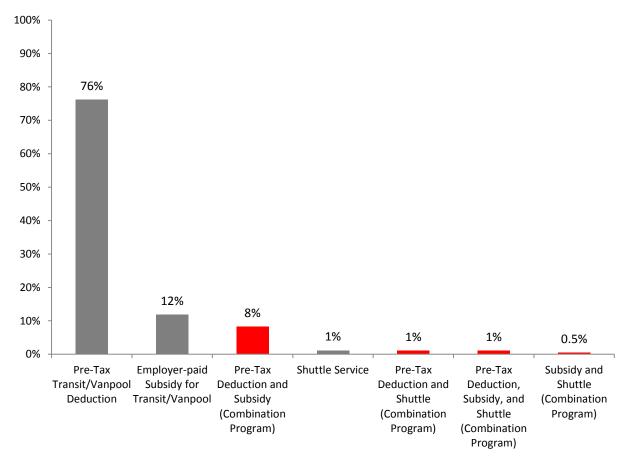
Although businesses exempt from the Ordinance are not required to provide commuter benefits to employees, the overall goal is to reduce the number of commuters driving to work. Fewer than one-third of these exempt companies offer a commuter benefits program to their employees as of 2012, indicating an opportunity for increased outreach to these businesses.



Question 1b: Even though you are exempt, do you offer a commuter benefits program?

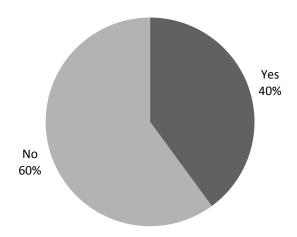
n = 413

Nearly 80 percent of businesses offer the pre-tax transit/vanpool deduction benefit to employees. Employer-paid subsidies were the next most popular benefit option, with 12 percent of businesses opting for this program. Nearly 10 percent of employers opted to offer a combination of a deduction and subsidy, whereby they are able to offer any subsidy amount in conjunction with the pre-tax deduction option.



Question 2: My business offers the following benefit(s): n = 2,873

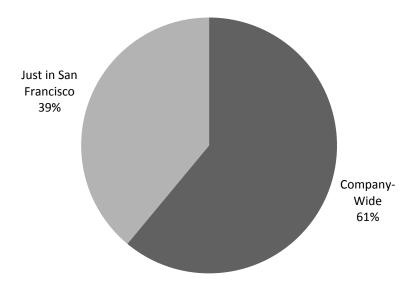
40 percent of non-exempt businesses report offering a commuter benefit program as a result of the Ordinance.



Question 3: Did you start your commuter benefits program because of the Commuter Benefits Ordinance?

n = 3,028

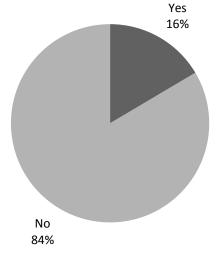
Nearly two-thirds of businesses offer commuter benefits to employees throughout their company, and do not limit the program to San Francisco employees.



Question 4: Is your commuter benefits program a) Company-wide or b) Just in San Francisco?

n = 3,028

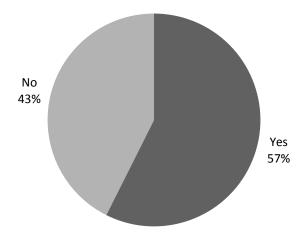
Of the companies offering benefits to employees company-wide, 16 percent report beginning to offer the benefit when required to do so in San Francisco per the Ordinance. While Question 3 demonstrates the ability of the Ordinance to effect change in San Francisco, this information indicates that nearly one-fifth of businesses were prompted by the Ordinance to make the benefit available to all employees.



Question 4a: Did you begin offering your commuter benefits program companywide because of the Ordinance?

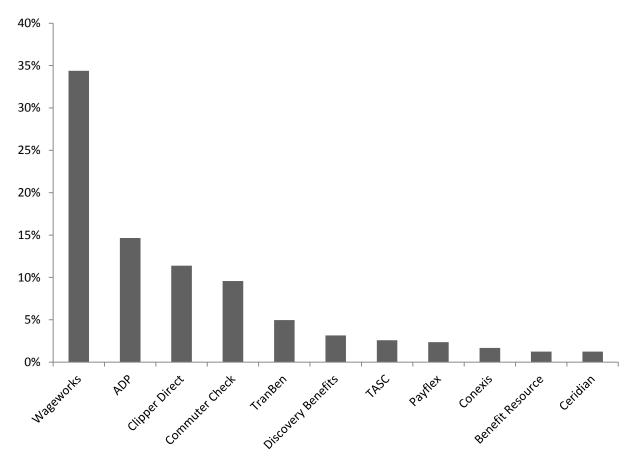
n = 2,135

Nearly 60 percent of businesses report using a third-party vendor to offer commuter benefits to employees. Working with a vendor ensures benefits are being offered in keeping with IRS regulations and



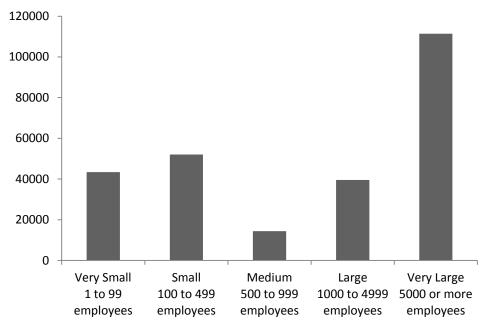
Question 5: Do you use a third-party vendor to help you administer your program? n=3,028

Companies indicated the vendors they work with to provide commuter benefits for employees. More than one-third of businesses report working with WageWorks.



Question 5a: If yes, what is the name of the vendor? n = 887

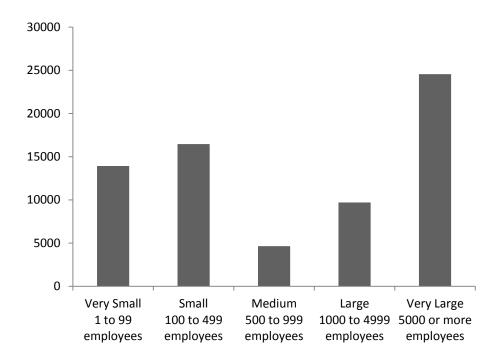
Companies reported approximately 260,747 total employees in San Francisco are eligible to participate in commuter benefits programs. Most of these eligible employees work at very large companies with 5,000 or more employees nationwide.



Question 6: As of today, how many San Francisco employees are eligible for your commuter benefits program?

n = 260,747

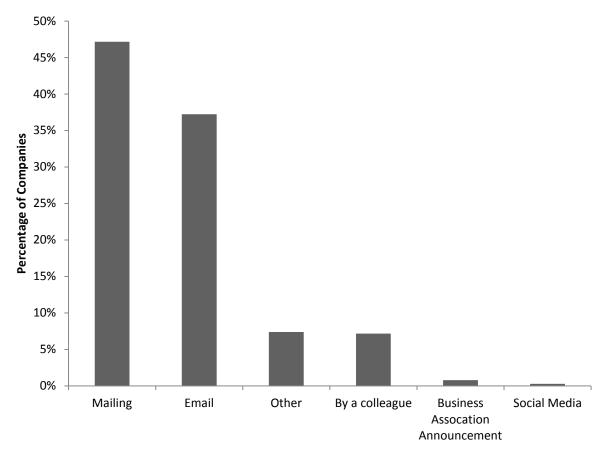
Of those eligible employees, a total of 69,261 employees were participating in commuter benefits programs in 2012 at reporting companies. The majority of participants work at very small or small companies with fewer than 500 employees or at very large companies with 5,000 or more employees total.



Question 7: As of today, how many San Francisco employees are participating in your commuter benefits program?

n = 69,261

Businesses primarily reported they were notified of the annual compliance process through the annual joint mailing with the Health Care Security Ordinance (HCSO) and by email from the Department of the Environment. Given the success of these methods, this outreach should be continued in future years.



Question 8: How were you notified to fill out the Compliance Reporting Form? n = 2,178

APPENDIX C - SAMPLE PROMOTIONAL MATERIALS

Starting **<enter date>**, **<enter company name>** will be offering to Commuter Benefits to all employees.

Commuter Benefits is a federal transportation benefit program that allows employees to save on their transit costs by deducting their commute expenses pre-tax from their paycheck each month. Employees save money because you don't pay taxes on the money you deduct.

You n can choose to receive their benefit in these forms:

- <enter what you are offering>.

To enroll for commuter benefits, employees must submit an enrollment form. These can be found at **<enter location>**.

For more information or questions contact <enter contact information>

Insert Company Logo Here

Commuter Benefits Employee Enrollment Form

<edit this form to fit your benefit program>

Please complete this form to enroll in the Commuter Benefits Program through <enter Company Name>. Return this form to <enter contact name or office location> by <enter enrollment deadline>.

What is Commuter Benefits?

Commuter Benefits is a federal transportation benefit program that allows employees to save on their transit costs by deducting their commute expenses pre-tax from their paycheck each month. You, the employee, save money because you don't pay taxes on the money you deduct.

Important Dates to Remember:

<enter enrollment and order change/cancellation deadlines>
<enter monthly date when employees will be deducted</pre>

<enter monthly date employees will receive their benefit>

<enter th="" what="" you="" □<=""><th>will be offering (i</th><th>.e. transit vouchers/debit ca</th><th>rds, Clipper Cards, etc)></th></enter>	will be offering (i	.e. transit vouchers/debit ca	rds, Clipper Cards, etc)>
2. How much woul	d you like to deduc	t from your paycheck?	
\$			
If you have any further que <enter contact="" name=""> <enter contact="" num<br="" phone=""><enter contact="" email=""> <enter contact="" loca<="" office="" th=""><th>nber></th><th>ommuter Benefits Program, plea</th><th>ase contact:</th></enter></enter></enter></enter>	nber>	ommuter Benefits Program, plea	ase contact:
By signing below, you agree on a pre-tax basis and have			ed from your paycheck each month
Employee Signature	Data	Employee Name (Drint)	Data
Employee Signature	Date	Employee Name (Print)	Date





Insert Company Logo Here

Commuter Benefits Employee Interest Survey

<Edit this survey to fit your organization>

Dear Valued Employee,

We are in the process of implementing a new employee benefit for transit and vanpool riders. To help us create a program to match your needs, we are conducting an interest survey. **This is not an enrollment form.**

How would it work?

By enrolling in the commuter benefits program, you could save money each month on your transit, rideshare or bicycle commute.

1.	Would you be interested in participating? Y	es l	No		
2.	How do you currently get to work? Circle all that	apply.			
	Personal Car Transit Carpool/Van	pool	Bike	Walk	Other:
3.	If you ride transit, which transit agencies do you r	ide? Ch	eck all age	encies tha	it apply.
	□ ACE □ Alameda Harbor Bay Ferry □ Alameda/Oakland Ferry □ American Canyon Transit □ Amtrak □ Angel Island-Tiburon Ferry □ BART □ Benicia Breeze □ Blue & Gold Fleet □ Caltrain □ County Connection □ Dumbarton Express □ Fairfield and Suisun Transit (FAST) □ Golden Gate Ferry □ Golden Gate Transit □ Hornblower Alcatraz Ferry □ Petaluma Transit □ Rio Vista Delta Breeze □ SamTrans □ San Francisco Muni □ Santa Rosa CityBus □ Sonoma County Transit		☐ Tri C ☐ Unic ☐ Vaca ☐ Valle ☐ Valle ☐ VINI ☐ Wes ☐ WHI	EELS ntville Sh	asit ansit Transit Ik Ferry it ounty)

	a.	Does your transit agency accept the Clipper Card? Yes No	
	b.	If yes, would you want your commuter benefits order on a Clipper Card? Yes	No
	c.	What benefit (pass/ticket/e-cash) would you order through Commuter Benefits?	
	d. 	How much does this benefit (pass/ticket/e-cash) cost?	
5.	What t	s your home ZIP code? time do you typically commute TO work? time do you typically LEAVE work?	

Please complete this survey before **<enter date>** and return to **<enter contact name or office location>**. After we have a program in place, we will issue a follow-up announcement with enrollment information.

Monday Tuesday Wednesday Thursday Friday Saturday

In the mean time, if you have further questions about Commuter Benefits, please contact:

7. What days do you typically work? Circle all that apply.

<enter Contact Name>

Sunday

<enter Contact Phone Number>

<enter Contact Email>

<enter Contact Office Location>

CommuteSmart



Insert Company Logo Here

<Enter Company Name> is Now Offering Commuter Benefits!

Starting <enter date>, we will be offering <enter type of benefit (i.e. subsidy, pre-tax deductions, etc)> to help you commute sustainably to work.

Want to sign up? Contact <enter name and contact information (i.e. HR office)>

For additional information please contact <enter contact name>





FRONT OF SAMPLE PAYCHECK INSERT

<Enter Company Name> is pleased to offer Commuter Benefits to you!

What is Commuter Benefits?

Insert Company Logo

Commuter Benefits is a federal transportation benefit program that allows employees to save on their transit costs by deducting their commute expenses pre-tax from their paycheck each month. You, the employee, save money because you don't pay taxes on the money you deduct. When you sign up for Commuter Benefits pre-tax deductions, we will make your requested deduction on the <enter monthly deduction date> of the month and deliver your transit benefits to you by <enter date each month employees will receive their benefit>.

<u>Example:</u> <change this example to reflect your program procedures.> It's the month of February. You enroll in Commuter Benefits and you elect to have \$74 deducted from your paycheck pre-tax and would like to get that \$74 as a monthly Muni Fast Pass "A". You will see a \$74 pre-tax deduction on the last paycheck of the month. You will receive a voucher to purchase your Muni Fast Pass "A" from your employer prior to the 1st of March.

Quick Questions:

How much can I deduct each month? You can deduct up to \$245/month from your paycheck on a pre-tax basis.

How will I receive my benefit? Employees can choose to receive their benefit in these forms:

<enter what you will be offering (i.e. transit vouchers/debit cards, Clipper Cards, etc)>

How do I sign up? Employees need to fill out an enrollment form, they can be found at <enter location>.

BACK OF SAMPLE PAYCHECK INSERT

<u>Important Dates to Remember:</u>

- <Here you want to tell employees when they can enroll, change, or cancel orders>
- <Here you want to tell employees when they will receive their transit orders>
- <Here you want to tell employees where their benefit will be delivered or where they can pick it up>
- < Include any other relevant dates for your business here>

Need More Information?
Contact Name:
Office Hours:
Office Location:
at <address, email,="" phone=""></address,>

APPENDIX D - EMISSIONS CALCULATIONS

Number of benefit program participants	69,267
Average commute distance	16 mi. one-way
Average daily VMT Reduction	2,216,544 miles (round-trip)
Average gallons of gas saved	93,132 gallons
Total daily reduction in CO ₂	831 metric tons
Total annual reduction in CO ₂	199,377 metric tons