

# Employee Traffic Reduction Program (ETRP) Update

North Front Range MPO, Technical Advisory Committee

March 17, 2021

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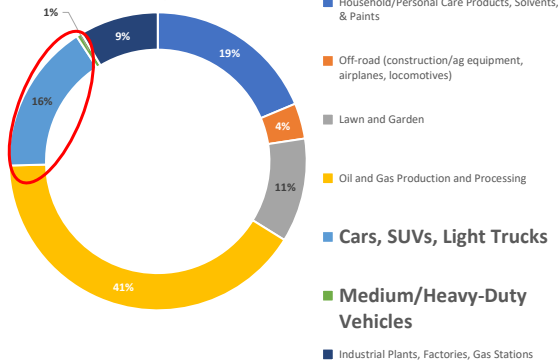
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## Role of Transportation in Ground-Level Ozone

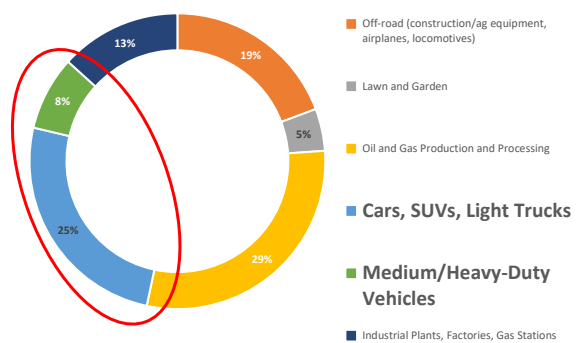
Vehicles are 17% of VOC emissions

Vehicles are 33% of NOx emissions

Sources of VOCs (Volatile Organic Compounds)



Sources of Nitrogen Oxides (NOx)



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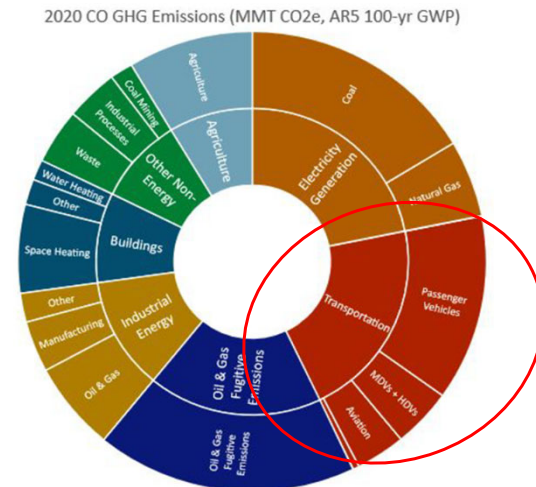
## Transportation's Contribution to Colorado's Greenhouse Gas Emissions

2005 Largest Emission Source:

1. Electric power
2. Transportation
3. Oil & Gas
4. Buildings

2020 Largest Emissions Sources

1. Transportation
2. Electric power
3. Oil & Gas
4. Buildings



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## What is an ETRP?

- Various approaches taken by employers to decrease employees' single occupancy vehicle (SOV) commuting trips that reduce ozone causing and climate degrading emissions.
- Encouraged or required by state and local governments around the country.
- Many Front Range organizations and local governments have for many years provided employers resources to take voluntary action.

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## Why ETRP?

- Our region violates federal ozone standards and needs to reduce greenhouse gas emissions (GHG) over time. We will become “severe” nonattainment in 2022 for the 2008 75 ppb ozone standard.
- Regardless of reclassification to “severe” nonattainment for the 2008 standard, in order for the region to meet its ultimate air quality goal – compliance with the 2015 70 ppb standard – we must be aggressive in our strategies to reduce emissions, including ETRP.
- The RAQC Board has directed the evaluation of numerous voluntary and mandatory approaches to reducing emissions in the ozone nonattainment area, including ETRP.
- The 1990 Clean Air Act originally required ETRPs for severe nonattainment areas. This requirement was softened in the mid-1990’s to recommended.

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## Statewide Program Under Consideration

- The Air Pollution Control Division (APCD) is developing an approach for reducing vehicle trips across Colorado\*, as part of the State's GHG Pollution Reduction Roadmap and a transportation rulemaking to address climate change.
- The State has been looking to the RAQC’s robust stakeholder process and draft ETRP framework and intends to propose an ETRP rule for consideration by the Air Quality Control Commission (AQCC) in May 2021, requesting a rulemaking hearing be set for August 2021.
- Over the next few months, as the State engages in regulation development and implementation, the RAQC’s primary roles will be to:
  - Continue efforts with partners to inform the State’s process
  - Continue efforts with partners to conduct outreach and education with large employers in the NAA on ETRP and resources available for support

*\*Note the APCD’s program is called “Employee Traffic Reduction Program” (ETRP)*

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## ETRP Elements

(Draft Framework Under Consideration)

- Goal of Program: Improve air quality and reduce GHG emissions through reduced single occupancy vehicle (SOV) trips by commuters.
- Who is Affected: Large employers (threshold TBD)
- Various Program Targets Under Consideration:
  - 10% reduction in employee SOV commuting, beginning in 2022.
  - No more than 75% of employees commuting by SOV, beginning in 2023.
    - This would mean that 1 in 4 employees not drive alone to work on any given work day.
  - No more than 60% of employees commuting by SOV, beginning in 2025.
    - This would mean that employees not drive alone to work twice a week on average.

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## ETRP Elements

(Draft Framework Under Consideration)

- Administrative Requirements Under Consideration:
  - Development of an employee trip reduction plan.
  - Appointment of transportation coordinator to manage efforts (an employee or contractor).
  - Periodic survey of employees to ensure compliance.
- Outreach:
  - An employer outreach program is under development.
  - Outreach materials available through CDPHE and RAQC.
  - Opportunities for public engagement over next few months.

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## Under Consideration: Tiered Approach Example

- Potential to establish SOV goals by context geography

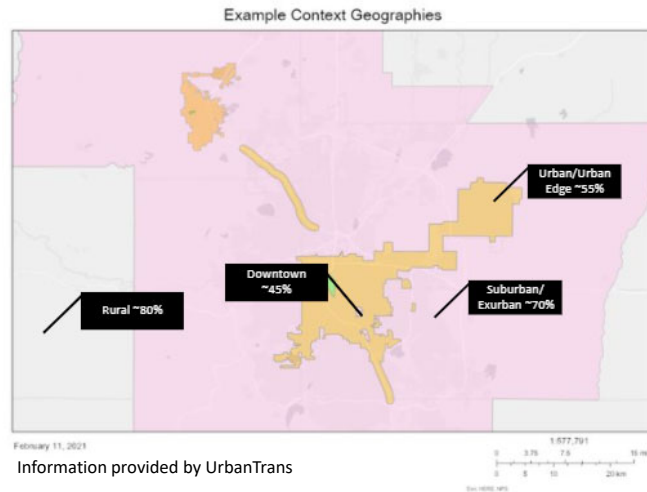
- **Example** Categorization and Goals:

**Downtowns:** Walkable, good bicycle connectivity, access to high-quality and frequent transit, mixed and dense land uses

**Urban/Urban Edge:** Generally walkable, high-quality but less frequent transit, mix of land uses with medium density

**Suburban/Exurban:** Less walkable, limited transit access, single use

**Rural:** Low density and very limited or no transit



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## Other Considerations

- Phased In Implementation
- Alternative compliance approaches
- Hardship waivers and exemptions
- Use of local governments, MPOs, consultants or transportation management organizations in lieu of internal staff to develop/oversee efforts
- Development of incentives for smaller employers to participate or for large employers to overachieve

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## Cost/Benefit Analysis Considerations

In preliminary stages of information gathering to inform cost/benefit analysis.  
Looking at the cost of the following:

- Providing transit passes for all employees
- Telework/Flex Scheduling
- Installation of electric vehicle charging stations
- Employer provided car/vanpool matching services
- Employer operated shuttle services
- Installation of bike facilities for employees
- Cost of dedicating staff time to ETRP efforts
- Cost of administering ETRP survey
- Employer tax incentives
- Cost savings from employee retention

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## ETRP Employer & Stakeholder Input Milestones

RAQC Stakeholder Process	February—March 2021
RAQC Board Meetings	April 2, 2021 May 7, 2021
AQCC Request for Rulemaking Hearing*	May 20-21, 2021
AQCC Pre-hearing Process*	June—July 2021
AQCC Rulemaking Hearing & Decision*	August 19-20, 2021

\*Interested and/or affected employers are encouraged to petition to become “parties to the rulemaking” if they so desire, in order to engage in prehearing deliberations and present testimony that could influence the final rule. This process will occur May – August.



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## Stakeholder Engagement

APCD is seeking feedback on all concepts related to ETRP:

- Employee threshold for rule applicability
- Commuting reduction goals
- Baseline and survey methodologies
- Tiered approach
- Timeline
- Equity considerations
- Role of MPOs and TMAs
- Strategies to encourage compliance

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## APCD ETRP Stakeholder Meetings & Listening Sessions

Upcoming Employee Traffic Reduction Program (ETRP) rule overview for businesses and organizations:

- **Wednesday, March 17, 2021, 4:00 - 5:00 p.m.**
- **Wednesday, March 24, 2021, 1:00 - 2:00 p.m.**
- **Friday, March 26, 2021, 9:00 - 10:00 a.m.**

Public listening sessions (in English or Spanish, also addressing transportation GHG pollution standards):

- **Thursday, March 18, 2021, 6:00 – 8:00 p.m.**

Additional sessions will be scheduled in April

To register for any of these events or provide written comments, visit:

[cdphe.colorado.gov/reducing-greenhouse-gas-emissions-from-transportation](https://cdphe.colorado.gov/reducing-greenhouse-gas-emissions-from-transportation)

*Once available, the draft APCD ETRP rule language will be available for review at this website.*

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## RAQC Stakeholder Process

The RAQC will continue its stakeholder process and invites interested employers to participate in the following meetings:

**Wednesday, March 17, 2021, 9:00 – 10:30 a.m.:** RAQC Control Strategy Committee meeting, find more information [here](#).

**Friday, April 2, 2021, 9:30 a.m. – 12:00 p.m.:** RAQC Board meeting, find more information [here](#).

**Friday, May 7, 2021, 9:30 a.m. – 12:00 p.m.:** RAQC Board meeting, find more information [here](#).

