

July 19, 2021

Statement of CDPHE Concerning Revision to Employee Traffic Reduction Program (ETRP) Proposal

As we continue to prioritize air quality and a reduction of greenhouse gas emissions, the State of Colorado recognizes the need to find ways to reduce vehicle miles traveled, including reducing the number of single occupancy vehicle (SOV) commuting trips. These reductions can have numerous environmental and economic benefits for Coloradoans including businesses and their employees, and it is important for businesses to lead by example at a critical juncture for our commuting patterns.

After reviewing the various prehearing statements in this rulemaking, the state recognizes that many of the businesses, employees, and local communities that will be impacted by the rule have concerns about the Employer Traffic Reduction Program (ETRP) as currently proposed. Recognizing these concerns, the Department will revise its ETRP proposal to first focus on data gathering components to establish a strong baseline for future policy paired with setting a strong foundation through a voluntary trip reduction approach. This new proposal is based on the recognition that lasting and meaningful success will require strong buy-in from employers and employees who are subject to the program, and a pilot phase will facilitate our understanding of real world implementation successes and challenges. To this end, the Division is working on revising its proposal to include the following elements:

Opportunities for employers to voluntarily develop ETRP Plans to accomplish reductions in SOV commuting, paired with incentives for early adopters that include recognizing credit toward potential future rules;

Mandatory regulatory requirements that large employers in the DMNFR conduct annual SOV Drive Rate surveys in order to develop robust baseline data and track SOV Drive Rates in the DMNFR;

Aspirational SOV Drive Rates of 60% or less by 2025 to be demonstrated through employers' survey reporting;

Ongoing tracking of SOV Drive Rate reductions related to voluntary implementation to assess whether future changes are warranted to meet the target, which may include adoption of additional ETRP regulatory requirements in the future.