

To: Chair and Members of the Board of Directors

From: Douglas W. Rex, Executive Director  
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Meeting Date	Agenda Category	Agenda Item #
July 21, 2021	Action	8

**SUBJECT**

Employee Traffic Reduction Program (ETRP) is a proposed amendment to State Rule 22, that would require large employers to support commute options in the workplace. A major revision to the previous draft, outlined in original board agenda packet materials, prompts this update and request for discussion and guidance.

**PROPOSED ACTION/RECOMMENDATIONS**

With a major revision to the draft rule proposed by CDPHE on 7/19, staff would like direction from the Board related to the current proposed amendment to Rule 22.

**ACTION BY OTHERS**

N/A

**SUMMARY**

As part of the State’s Greenhouse Gas Emissions Reduction Roadmap, released in January 2021, the transportation sector was identified as a major contributor to GHG emissions in the ozone non-attainment area, and the state proposed action to encourage employers to support commute options in the workplace. The Air Quality Control Commission will hold a rulemaking hearing on Aug. 18, and DRCOG has party status, giving our organization an opportunity to testify.

Colorado Dept. of Public Health and Environment initially proposed an amendment to State Rule 22, known as Employee Traffic Reduction Program (ETRP). The draft amendment would have required large employers to support commute options in the workplace and outlined a list of requirements, including development and implementation of TDM plans, if needed to meet SOV rate targets. At the 7/19 prehearing conference, CDPHE issued a statement significantly revising their proposal, making plan development and implementation “voluntary”, while retaining the requirement for annual surveys. This essentially makes it a “reporting rule”. We do not at this time have a copy of the new language associated with this change.

Staff will present the key elements of previous draft ETRP, as well as the major revision presented on July 19, and seek direction from the Board.

**PREVIOUS DISCUSSIONS/ACTIONS**

[Apr. 21, 2021](#)– Colorado Dept. of Health and Environment informational presentation to Board of Directors

**PROPOSED MOTION**

At the Board’s discretion

ATTACHMENTS
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1. CDPHE ETRP statement
2. Staff presentation

ADDITIONAL INFORMATION
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If you need additional information, please contact Douglas W. Rex, Executive Director, at (303) 480-6701 or [drex@drcog.org](mailto:drex@drcog.org); or Steve Erickson, Communications & Marketing Director, at (303) 480-6716 or [serickson@drcog.org](mailto:serickson@drcog.org).