



South Coast
AQMD

Proposed Amended Rule 2202 On-Road Motor Vehicle Mitigation Options

Working Group Meeting #3

May 3, 2023

Join Zoom Webinar Meeting

<https://scaqmd.zoom.us/j/94339030649>

Webinar ID: 943 3903 0649

Teleconference Dial-In: (669) 900-6833

Agenda

- Recap of Working Group #2
- Concepts for Proposed Amendment to Rule 2202
 - Vehicle Miles Traveled (VMT)
 - Telecommuting
 - Cleanup and Administrative Revisions to Rule Documents
- Summary of Proposed Amendments
- Next Steps



Working Group #2 Recap

Working Group #2 Recap

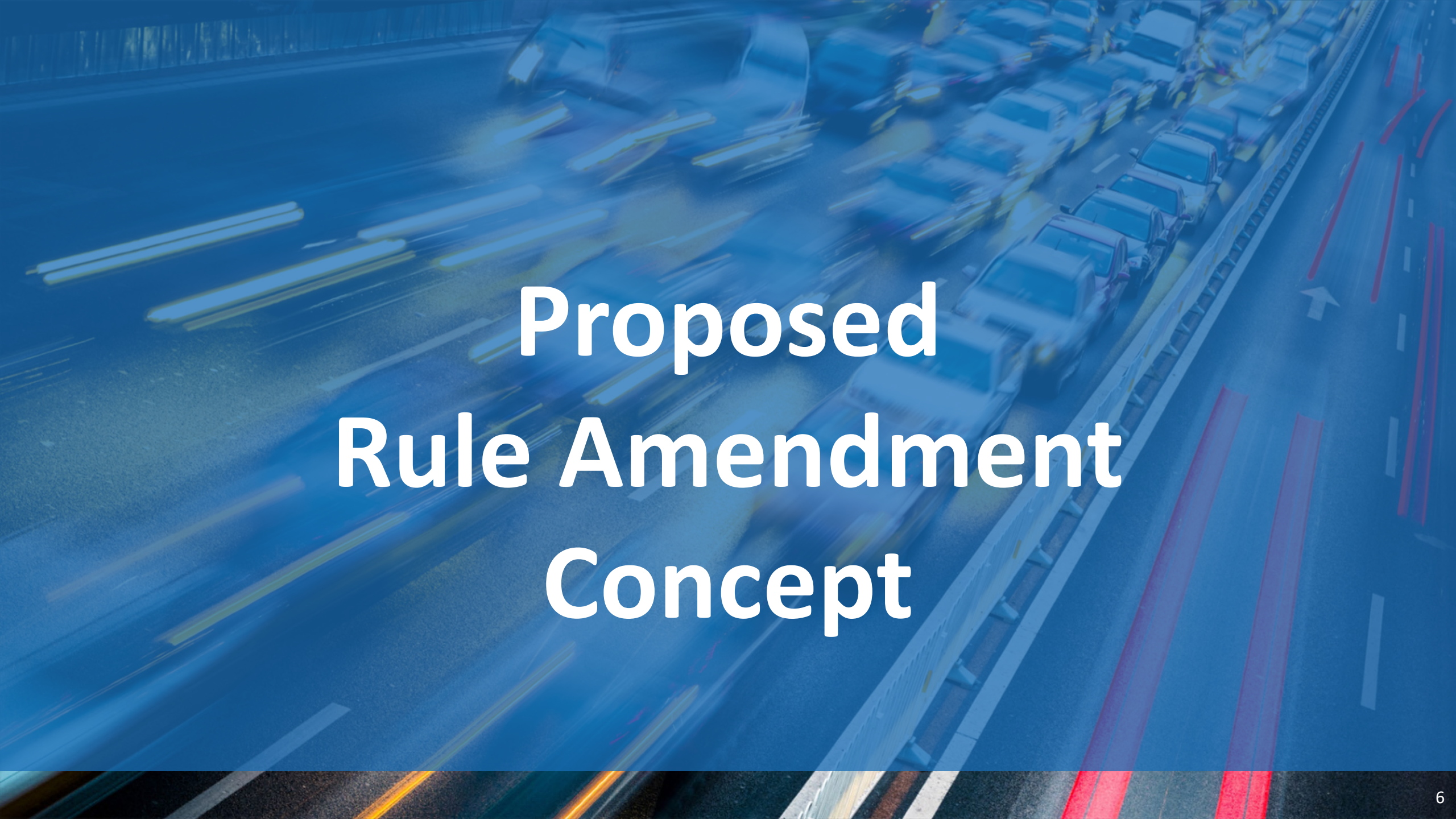
- Current Rule 2202 Implementation
 - COVID-19 temporary protocols
- Concepts for proposed amendment to Rule 2202
 - Clean up and administrative revisions to Rule documents
 - Telecommuting
 - Vehicle Miles Traveled (VMT)
- VMT data usage by CARB and SCAG
- Addressed attendees' questions about PAR 2202, compliance, etc.

Working Group #2 Recap (cont.)

General Questions and Comments

- Vehicle Miles Traveled (VMT)
 - *How will VMT data be collected?*
- Telecommuting
 - *When will reporting requirements take effect?*
- Rule Cleanup and Administrative Changes
 - *How will sites be affected by updated/new definitions?*
- Coordinated with stakeholders to better understand specific concerns
- This presentation aims to address feedback from stakeholders





Proposed Rule Amendment Concept

Overall Concept

1. Collect new data to inform Phase II rulemaking

- New data reporting required from all worksites
 - Vehicle Miles Travelled (VMT) data
 - Telecommuting policy data
 - Worksite categorization (e.g., manufacturing vs. office) data

Initiation of
New Reporting
Requirements
July 2024

2. Administrative cleanup/streamlining for rule implementation

- Guidance document revisions
- Reporting updates for some strategies



Vehicle Miles Traveled (VMT) Data Collection

VMT Comments from Past Working Groups

Majority of comments from two previous working groups were related to VMT:

- VMT data collection
 - Will VMT be collected on the employee survey?
 - How will employers be expected to report VMT?
- Commute mode considerations
 - Will VMT be collected for all modes of travel?
- How will VMT be used in Rule 2202?
 - Current success is based on reaching an AVR target
 - How will success be achieved if VMT is the metric?

Coordination with CARB and SCAG

Discussion with CARB staff

- VMT is an important metric used by CARB to assess green house gas emissions
 - Emphasized the need to reduce VMT to reach air quality standards
- Work commute VMT data would be helpful in assessing localized emissions in certain areas and supporting future planning efforts

Discussion with SCAG staff

- SCAG staff sees the value in the collection of work commute VMT from employers subject to Rule 2202, which may be used to enhance modeling and planning efforts
- Collecting VMT by mode is important to more accurately assess emissions
- Worksite industry type can be used along with VMT will help assess trends in telecommuting

VMT and Emissions

CARB

- VMT is used to estimate criteria air pollutant and greenhouse gas emissions
- Estimate also relies on number of vehicles and average trip length

SCAG

- Total vehicle emissions based on CARB's breakdown of electric VMT and combustion VMT

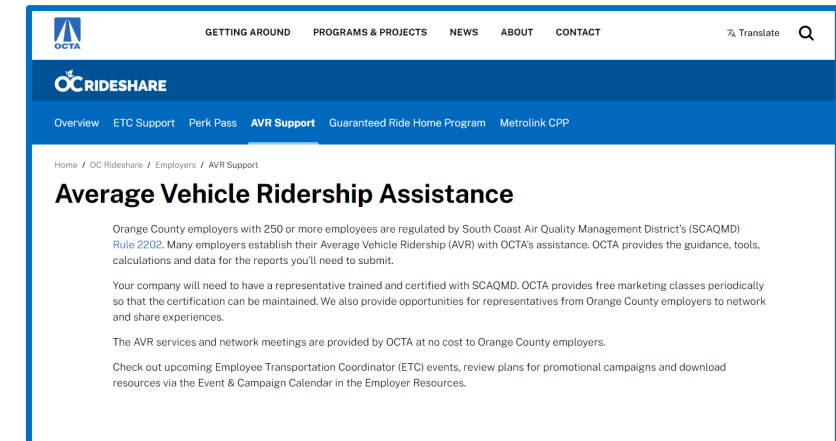
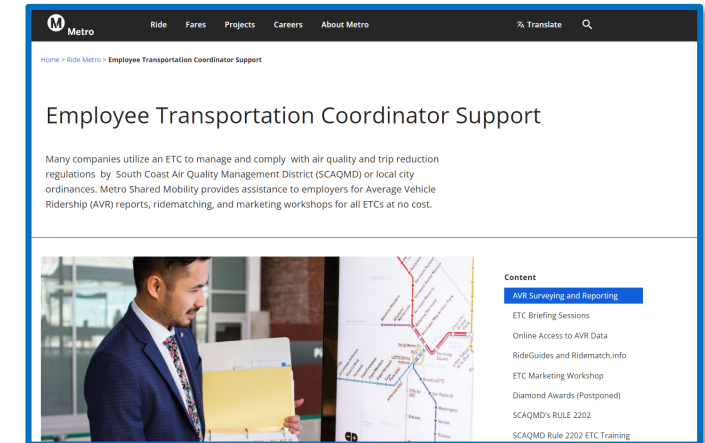
South Coast AQMD

- Proposing to collect work commute VMT to assess potential compliance options for future rulemaking
- VMT can be used to estimate emissions from work commute trips

Existing Online Survey Used By Transit Agencies

Online AVR survey tool already in use:

- Tool created by private consulting firm
- Widely used across all transit authorities in all four counties
- Survey tool collects VMT from survey participants using home to worksite distance
- Survey tool includes VMT by commute mode
 - Calculates VMT reduced by non-drive alone commute modes
 - VMT used to calculate metrics such as gallons of gas saved or pounds of emissions reduced



Proposed VMT Reporting Requirement

All regulated sites within Rule 2202 will be required to report total VMT

- Two categories of data collection

1. Employers who conduct a survey will collect data through the survey form:

- All employers who conduct a survey must collect VMT by asking their employees to report the distance (in miles) from home to the worksite
- Total VMT will be calculated similar to the total employee trips on the AVR survey summary
 - Fields will be added to the survey and compliance paperwork
- Worksite business/industry type will also be required to aid data analysis

The image shows two forms. The top form is the 'Average Vehicle Ridership (AVR) Survey Form' with fields for 'Survey Week', 'Employee Information', and 'Mode of Transportation'. The bottom form is the 'RULE 2202 - REGISTRATION FORM' which includes a table for 'Section IV-2 (Cont.) D. Weekly Employee Survey Summary Form (Peak)'. The table has columns for 'Mode', 'MON', 'TUE', 'WED', 'TH', 'FRI', and 'Total'. The modes listed include 'No Survey Response (50-89%)', 'Surveys with Errors', 'A. Zero Emission Vehicle', 'B. Bus', 'C. Rail/plane', 'D. Walk', 'E. Bicycle', 'F. Telecommute', 'G. Noncommuting', 'H. Drive Alone', 'I. Motorcycle', 'J. 2 persons in vehicle', 'K. 3 persons in vehicle', 'L. 4 persons in vehicle', 'M. 5 persons in vehicle', 'N. 6 persons in vehicle', 'O. 7 persons in vehicle', 'P. 8 persons in vehicle', 'Q. 9 persons in vehicle', 'R. 10 persons in vehicle', 'S. 11 persons in vehicle', 'T. 12 persons in vehicle', 'U. 13 persons in vehicle', 'V. 14 persons in vehicle', 'W. 15 persons in vehicle', 'X. 3/76 work week days off (2 day)', 'Y. 4/40 work week day off (1 day)', 'Z. 8/80 work week day off (1 day)', 'Other Days Off (mixed schedule)', 'AA. Vacation', 'BB. Sick', and 'CC. Regular Day Off, Jury Duty, LDA, etc.'. There is also a section for 'Compressed Work Week Day(s) Off' and 'Other Days Off'.

Proposed VMT Reporting Requirement (cont.)

2. For all other employers who do not conduct a survey:

- AQMD staff proposing to use zip codes of employees provided by employers to calculate VMT
 - In lieu of requiring AVR survey
 - Home zip code to worksite zip code can be used to calculate approximate VMT
 - Employer records acceptable (e.g., payroll, HR, etc.) rather than employee surveys
- VMT will be analyzed and compared with VMT collected from surveying sites (which includes commute mode data)

South Coast AQMD plans to develop a VMT reporting tool to aid in the electronic submittal of VMT data

Possible Future Use of VMT in Rule 2202

1st phase of Rule 2202 amendment:

- Focused on VMT data collection and reporting
- VMT will be analyzed to inform the 2nd phase of rule amendment

Potential future analyses of VMT data:

- Analysis of correlation between VMT and AVR
- Evaluate establishing VMT as a compliance metric
- Potentially use VMT reduction as a compliance option
- Revise geographic zones for compliance based on VMT data analysis



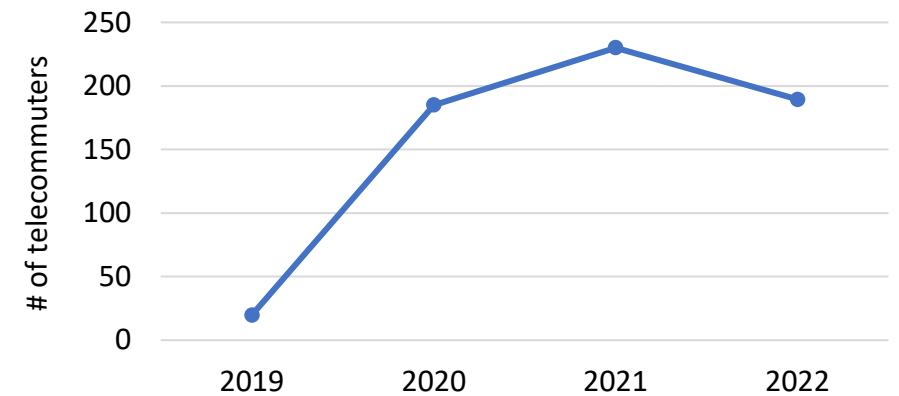
Telecommuting in PAR 2202

Telecommuting Data

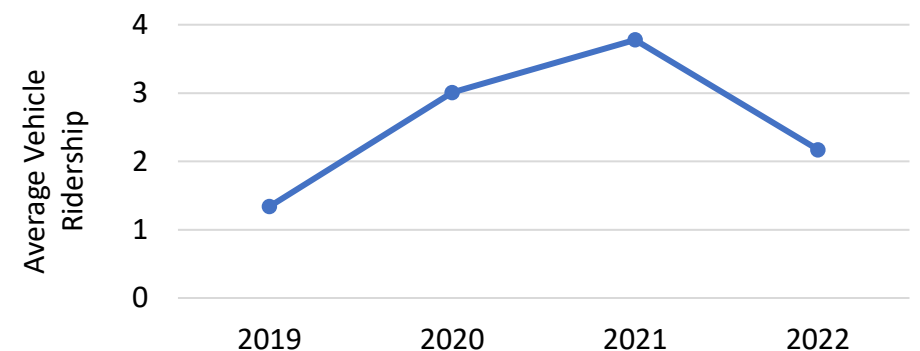
AVR data shows an increase in the amount of telecommuters starting in 2020 and the impact on AVR scores

- This reduction in vehicle trips was evident across all regulated sites
- PAR 2202 will streamline telecommuter reporting

Average Daily Telecommuters



Average AVR



Telecommuter Reporting

Use of human resources (HR) / payroll records

- Worksites allowed to use records to document actual and eligible telecommuters in place of employee survey
- This method may be used for all compliance options (AQIP, ERS or ECRP)
- New template for submitting telecommuter records is being developed and will be required at time of annual plan submittal:
 - Additional page to be submitted with compliance paperwork
 - Streamline telecommuter reporting requirements for worksites
 - Standardize telecommuter reporting across all Rule 2202 worksites

Telecommute Reporting Advantages

All regulated sites will submit the new compliance page that documents the site's telecommuting protocol and number of telecommuters

Air Quality Investment Program (AQIP)

Document amount of telecommuters to pay lower AQIP fee

Emission Reduction Strategies (ERS)

Document number of telecommuters to purchase fewer emission credits

Employer Commute Reduction Program (ECRP)

Document number of telecommuters to receive full credit for telecommuting trips on the AVR survey

Telecommuting for ECRP: Direct Strategy

Additional Questions

- How many employees are eligible to participate?
- Are employee telecommuting incentives offered?
- Are employee teleworking schedules permanent or is a return to office date set?
- How many employees are currently participating in your telecommuting program?
- What is the average number of days per week that your employees telecommute?

Existing ECRP Form



RULE 2202 - REGISTRATION FORM

YEAR:
SITE ID:

Telecommuting - Telecommuting means working at home, off-site, or at a telecommuting for a full workday that eliminates the trip to work or reduces travel distance to the center worksite by more than 50%.

Does a written policy exist? Yes No

The employer telecommuting program consists of:

(Check each element that applies.)

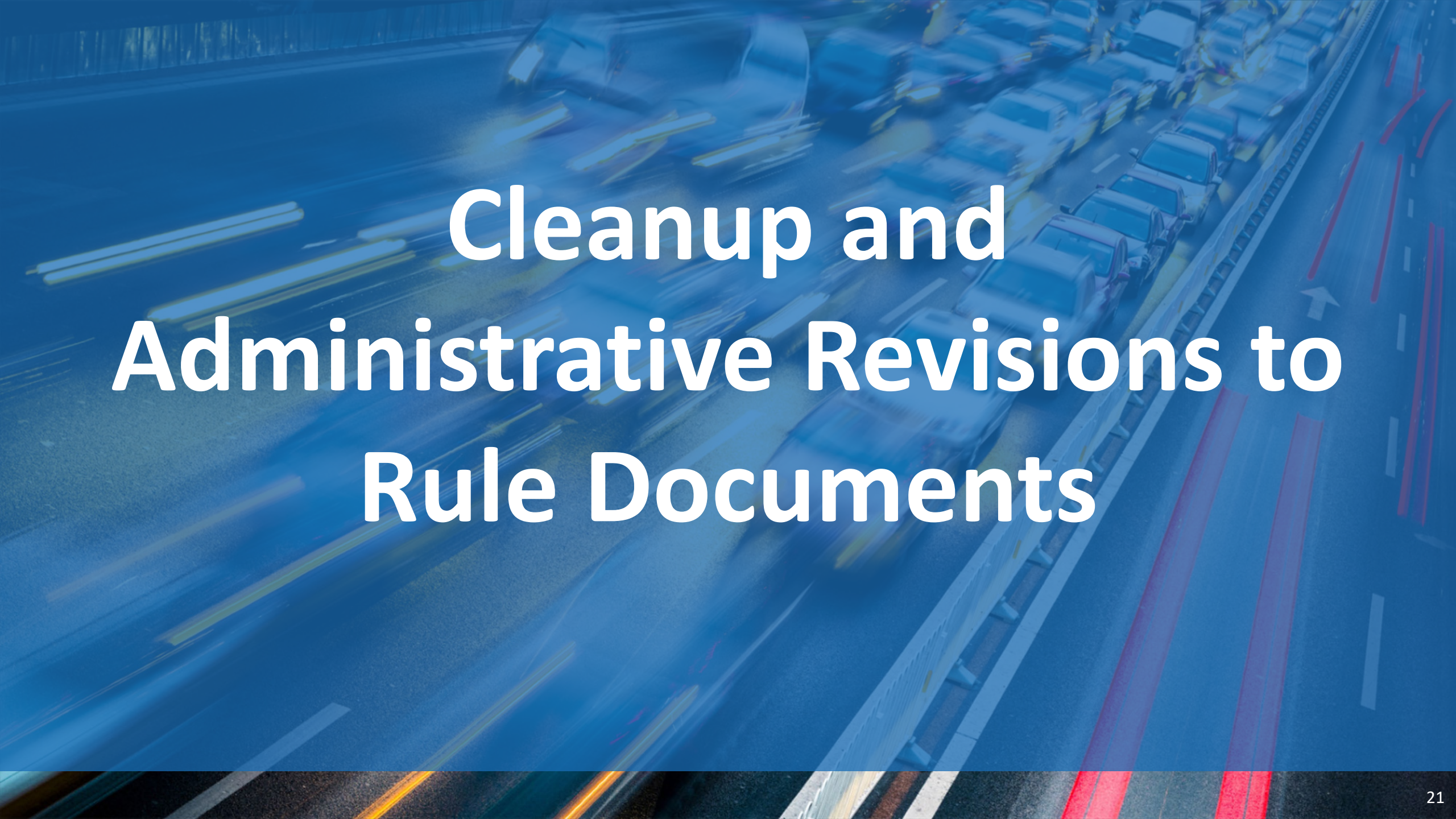
Orientation / Training Sessions

Working at Home # of Days per Week

Working at Telecommuting Center # of Days per Week

Other (specify)

Please enter the number of eligible program participants: _____



Cleanup and Administrative Revisions to Rule Documents

Rule 2202 Documents: Definitions

Definitions for the following terms will be updated/added across all Rule 2202 related documents:

- Furloughed employee
- Zero-emission vehicle
- Telecommuting employee
- Non-commute mode
- Vehicle miles traveled

Implementation Guidelines and ECRP Guidelines

Update both guideline documents to address the following:

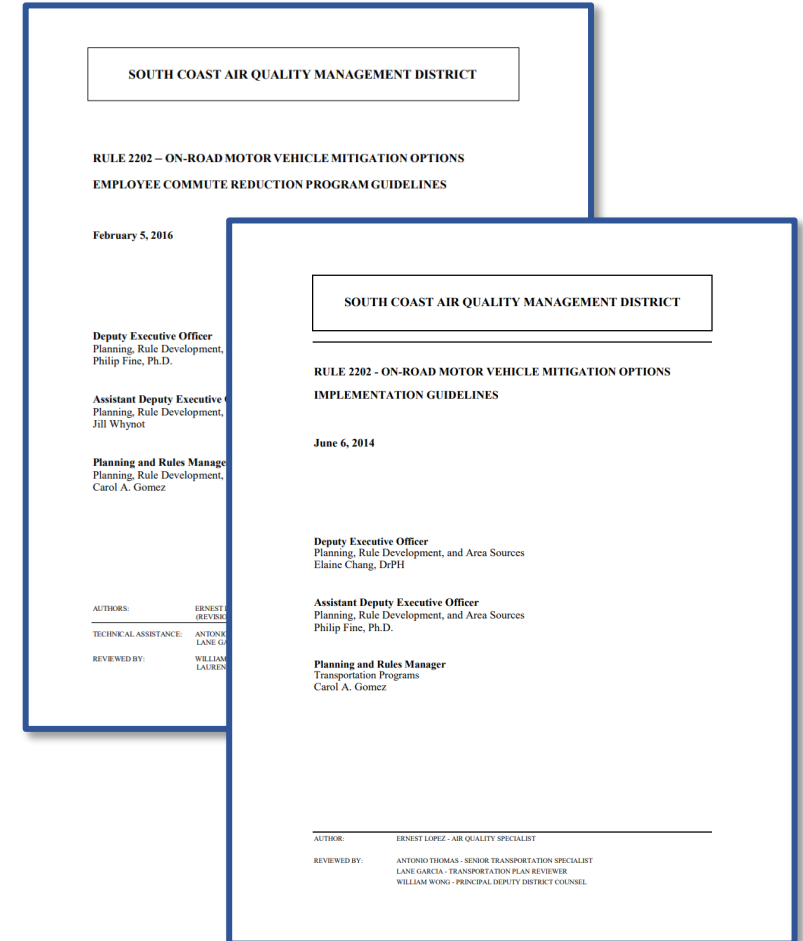
- Reporting requirements for telecommuting employees
- Respective VMT data collection and reporting requirement
- Definitions

Implementation Guidelines will address:

- Certified ETC requirements for sites that conduct a survey

ECRP Guidelines will address:


- Strategy changes



ECRP Guidelines and Compliance Forms: Marketing Strategies

Staff are proposing to update the marketing strategies:

- Reformat page to provide space to specify details underneath each strategy
- New fields to gather additional information on each strategy
- Additional information provided will allow South Coast AQMD staff to compare implementation across compliance years

 **RULE 2202 - REGISTRATION FORM** YEAR:
SIT E ID:

Section IV-3: Good Faith Effort Determination Elements

A. Marketing Strategies

Employers who have not attained the target AVR and are not eligible for either the High AVR Program or the AVR Improvement Program must select at least five (5) Marketing Strategies to be implemented at each site by inserting the appropriate frequency code inside the box from the following:

***Frequency Codes Table:**

How often is the benefit provided?	
D = Daily	B = Bi-monthly
W = Weekly	Q = Quarterly
M = Monthly	S = Semi-annually
A = Annually	O = Other (specify)

N/A Attendance at a Marketing Class, at least Annually (must submit proof of attendance with the plan submittal)

N/A Direct Communication by the highest ranking official, at least Annually (written or electronic)

N/A Employer Newsletter, Flyer/Announcements/Memo/Letter to Employees, at least Quarterly. If provided electronically, an update or notice must be sent to all employees of the communication's availability

N/A Employer Rideshare Events, at least Annually

N/A New Hire Orientation, as needed

N/A Rideshare Bulletin Boards/Commuter Information Kiosks/Display Racks

N/A Rideshare Meetings/ Focus Group(s), at least Semi-Annually

N/A Rideshare Website, at least Quarterly announcements to employees (If provided electronically, an update or notice must be sent to all employees of the communication's availability)

N/A Other Marketing Strategies (please specify below):

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ECRP Guidelines and Compliance Forms: Basic/ Support Strategies

➤ “Other” Basic/Support strategies will be listed as independent strategies:

- EV Infrastructure
- TMA/TMO Services
- Car Sharing Services
- Mobility Hub Services
- Voluntary Worksite Transfers

➤ These strategies are more commonly used today and additional information is needed to track implementation

RULE 2202 - REGISTRATION FORM YEAR: SITE ID:

B. SUMMARY OF STRATEGIES
Employers who have not attained the target AVR and are not eligible for either the High AVR Program or the AVR Improvement Program must select and complete the corresponding pages for at least five (5) Basic/Support and five (5) Direct Strategies from the following menu that the worksite will be implementing.

BASIC/SUPPORT STRATEGIES

<input type="checkbox"/> Commuter Choice Program	<input type="checkbox"/> Preferential Parking for Ridesharing
<input type="checkbox"/> Flex Time Schedules	<input type="checkbox"/> Rideshare Matching Services
<input type="checkbox"/> Guaranteed Return Trip	<input type="checkbox"/> Transit Information Center
<input type="checkbox"/> Personalized Commute Assistance	<input type="checkbox"/> Other

DIRECT STRATEGIES

<input type="checkbox"/> Auto Services	<input type="checkbox"/> Parking Cash Out/Parking Mgmt. Strategies (Voluntary)
<input type="checkbox"/> Bicycle Program	<input type="checkbox"/> Points Program
<input type="checkbox"/> Compressed Work Week	<input type="checkbox"/> Prize Drawings
<input type="checkbox"/> Direct Financial Awards	<input type="checkbox"/> Start-up Incentives
<input type="checkbox"/> Discounted or Free Meals	<input type="checkbox"/> Telecommuting
<input type="checkbox"/> Employee Clean Vehicle Purchases	<input type="checkbox"/> Time Off with Pay
<input type="checkbox"/> Gift Certificates	<input type="checkbox"/> Transit Subsidy
<input type="checkbox"/> Off Peak Rideshare Program	<input type="checkbox"/> Vanpool Program
<input type="checkbox"/> Parking Charge/Subsidy	<input type="checkbox"/> Other

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RULE 2202 - REGISTRATION FORM YEAR: SITE ID:

Other Basic/Support Strategies: The employer can provide other types of Basic/Support strategies designed to encourage solo commuters to participate in the Employee Commute Reduction Program if your worksite is implementing strategies not identified in this package. Examples of Other Basic/Support Strategies may include, but are not limited to:

On-site Amenities	<input type="checkbox"/>	TMA/TMA Services	<input type="checkbox"/>
Car Sharing Services	<input type="checkbox"/>	Mobility Hub Services	<input type="checkbox"/>
EV Infrastructure * (Complete below)	<input type="checkbox"/>	Voluntary Worksite Transfers	<input type="checkbox"/>
Other**	<input type="checkbox"/>		

*** EV Infrastructure:**

Total Number of Charging Stations:

Total Number of Ports (may be more than one per station):

Please provide information for each type of Charger available at worksite:

Charger Level: <input type="text"/>	Charger Level: <input type="text"/>	Charger Level: <input type="text"/>
Ports per Charger: <input type="text"/>	Ports per Charger: <input type="text"/>	Ports per Charger: <input type="text"/>
Charger Manufacturer: <input type="text"/>	Charger Manufacturer: <input type="text"/>	Charger Manufacturer: <input type="text"/>
KWH Supplied (if known): <input type="text"/>	KWH Supplied (if known): <input type="text"/>	KWH Supplied (if known): <input type="text"/>

When including EV infrastructure, it must meet the criteria noted on the SCAQMD's EVCS protocol - Electric Vehicle Charging Station (EVCS) means a device or station that provides power to charge the batteries of a dedicated battery-electric vehicle. If necessary, please attach a list of any additional chargers.

****Other** - Please provide a detailed description for each service identified above, identifying eligibility requirements and all information needed to implement the strategy. If additional space is needed, you may photocopy this page and include it in this submittal.

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ECRP Guidelines and Compliance Forms: Direct Strategies

- New fields will be added to some strategies requiring additional information to track implementation:
 - Telecommuting
 - How many employees are eligible to participate?
 - Are employee telecommuting incentives offered?
 - Are employee teleworking schedules permanent or subject to change in the near future?
 - How many employees are currently participating in your telecommuting program?
 - What is the average number of days per week that your employees participate in telecommuting?
 - Bicycle Program
 - Do you participate in Bike to Work Month?

Remove Auto Services strategy

- Focus on promoting zero-emission commute modes

RULE 2202 - REGISTRATION FORM YEAR:
SITE ID:

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<input type="checkbox"/> Employee Clean Vehicle Purchases	<input type="checkbox"/> Time Off with Pay
<input type="checkbox"/> Gift Certificates	<input type="checkbox"/> Transit Subsidy
<input type="checkbox"/> Off Peak Rideshare Program	<input type="checkbox"/> Vanpool Program
<input type="checkbox"/> Parking Charge/Subsidy	<input type="checkbox"/> Other

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Summary of PAR 2202 Document Revisions

Rule 2202

- Language expanded on ECRP
- Definitions updated/ added

Implementation Guidelines

- Language updates
- Telecommute reporting
- ETC training requirement for sites that conduct an AVR survey

ECRP Guidelines

- Specific strategies updated
- Telecommute reporting

AVR Survey Form

- Home to work miles traveled (VMT)
- Provide instruction to clarify telecommute, non-commuting, and compressed work week modes

Compliance Forms

- Worksite industry type
- Specific ECRP strategies updated
- New template for submitting telecommuter records
- VMT summary reporting or zip code list

Summary of New Reporting Requirements

Additional information for PAR 2202:

- VMT Data Collection and Reporting:
 - Via employee survey (sites that conduct surveys)
 - Via employee zip code list (sites that do not conduct surveys)
- Telecommuting worksheet (AQIP, ERS or ECRP plans)
 - Obtain credit for telecommuters without conducting a survey
- Worksite business/industry type
- Additional strategy information (e.g. telecommuting for ECRP sites)

Proposed implementation date for new reporting requirements: July 2024

- Allows time for staff to develop materials, update compliance forms, provide training, etc.

An aerial, high-angle view of a multi-lane highway. The image is heavily blurred to convey a sense of rapid motion and traffic flow. A semi-transparent blue overlay covers the entire scene. The text 'Next Steps' is centered in a white, bold, sans-serif font.

Next Steps

Proposed Amended Rule 2202

Staff is proposing to amend Rule 2202 in two phases

Phase 1 August 2023

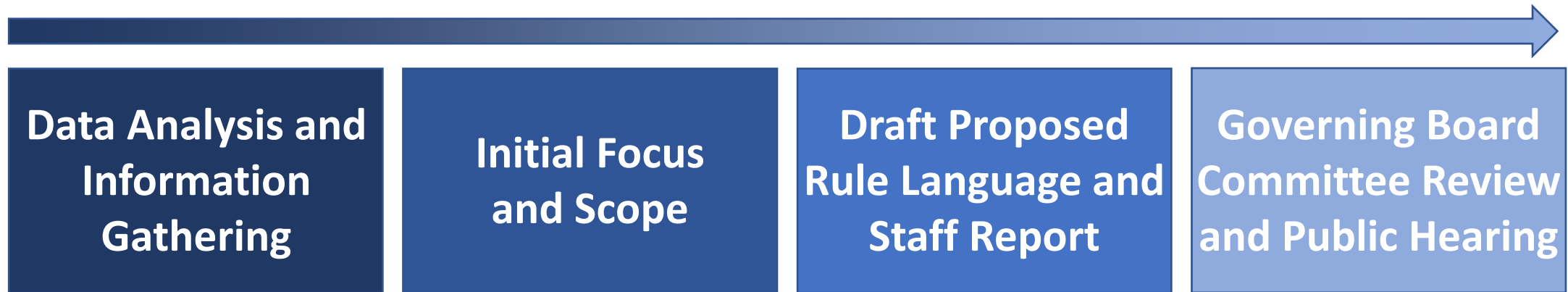
- Require VMT reporting to collect data for Phase 2
- Collect additional site-specific telecommuting policy details
- Minor rule cleanup, administrative revisions and additional clarification

Phase 2 2025-2026 *(rulemaking to begin in 2024)*

- Consider using VMT as primary metric within rule
- Reassess performance zones to factor in new high quality transit areas and travel patterns
- Evaluate compliance options for zero-emission passenger vehicles and supporting infrastructure
- Evaluate continued use of credit options for compliance
- Modify rideshare program requirements and reporting

Rule Development Process

Stakeholder Input



Rule Amendment Schedule

1 st Working Group Meeting	February 23, 2023
2 nd Working Group Meeting	March 22, 2023
3 rd Working Group Meeting	May 3, 2023
4th Working Group Meeting	TBD
Mobile Source Committee	May 19, 2023
Set Hearing	June 2, 2023
Public Workshop	June XX, 2023
Public Hearing/ Governing Board	August 4, 2023

Staff Contacts

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Proposed Amended Rule 2202 Webpage

<http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-2202>