#8

AQMD Comments

The MTA is concerned with the Southern California Air Quality Management District plan to amend Rule 2202. They are proposing mandatory attainment through the Air Quality Investment Program (AQIP) - a program where employers, who fall below Average Vehicle Ridership (AVR) targets, make up the difference by paying fees.

We believe this action would drive employers away from rideshare programs – which could in turn, increase traffic congestion and ultimately increase mobile source air pollution.

JPL, for example, has an aggressive rideshare program, but their AVR is below target. Under the new AQMD amendment, JPL would be required to pay an additional $19,000 per year in addition to their current program efforts. LA Medical Center, with an AVR of 1.13, would have to pay $28,020 per year, Kaiser Permanente $450,000 and the County of Los Angeles could face a fee as large as $700,000.

With the advent of AQIP, Southern California has seen an ever-increasing number of employers opting out of their rideshare programs in favor of writing a check. Numerous employers, who currently comply with Rule 2202, are threatening to downsize or eliminate existing Rideshare programs if the AQMD continues on this course.

(more)

Furthermore, we have serious concerns with the proposal to bypass the SCAQMD Board with any and all amendments to Rule 2202. It potentially bypasses public and stakeholder input and places too much unilateral power in one position.

The MTA is committed to working with employers to provide the right combination of alternative transportation programs so that area employers will exceed AVR targets. We suggest that the SCAQMD join in and focus more on attainment and less on payment. Together we can improve air quality, reduce congestion and increase mobility.

We have drafted a letter stating our concerns and are preparing to forward it to AQMD before the August 22 public comment period closes.

Amendments to Rule 2202

- Deletes "good faith effort" for AVR attainment
- All companies w/ 250 or more employees must attain AVR goal
- Costly impact to large percentage of companies
  - LA County: $700,000 annually
- Discourages companies to support rideshare efforts because if they don't reach their goal they'll still have to pay, programs will deteriorate and companies will opt out
- Daily trips will increase, no incentive to rideshare
- Negatively impacts congestion, air pollution, land use, energy and noise
- Future changes may be made by Executive Officer, excluding policy makers
- Does not give new regional rideshare efforts a chance to work
  - Regional Ridematch
  - Employee Pass
  - Guaranteed Ride Home
  - FlexCar
  - Vanpool Incentives
- Can't buy our way out of air pollution problem
- Recommend supporting Alternative B
  - Retains "good faith effort" for businesses