it makes financial sense, as well as practical sense, to implement several of the alternative commuting measures on a year-round basis, thereby avoiding continual start-up costs and the initial resistance of commuters to changing their commuting habits.

Comment

Several commenters note that high ozone levels have been recorded only in one urbanized area of Lake County and no monitoring data exist to justify expansion of the ECO program to all of Lake County or any of Porter County.

USEPA Response

Lake and Porter Counties, Indiana are part of the Chicago consolidated metropolitan statistical area (CMSA) as determined by the census bureau. Section 107(d)(4)(A)(iv) of the Act requires that the boundaries of any ozone nonattainment area classified as serious, severe, or extreme by operation of law include the entire CMSA. Congress thus ensured that the entire area contributing ozone forming pollutants would be included in the nonattainment area. The inherent nature of ozone formation is that volatile organic compounds and oxides of nitrogen are emitted in one area and carried downwind while reacting in the presence of sunlight to form ozone. Thus, the highest concentrations of ozone are not necessarily experienced in the area producing the greatest amount of pollutants but instead the highest ozone readings may be recorded many miles downwind.

Section 181(a) of the Act also requires that the years to consider when determining the classification of an area were to be the years 1987 to 1989. In the case of Lake and Porter Counties, the monitoring site at Ogden Dunes in Porter County recorded 4 days during 1987, 10 days during 1988, and 0 days during 1989, with ozone exceeding the National Ambient Air Quality Standard (NAAQS). The highest 1-hour ozone level at the Ogden Dunes site was during 1988 and was 0.192 parts per million (ppm). The monitoring site in Lake County with the most ozone exceedances during this time period was in Hammond, Indiana which recorded 1 exceedance day during 1987, 5 days during 1988, and 0 days during 1989. The highest 1-hour ozone concentration was 0.186 ppm. However, the sites in Lake and Porter Counties were not the highest sites in the CMSA. The monitoring site with the highest recorded ozone levels in the CMSA is located in Kenosha County, Wisconsin. This site recorded 18 days during 1988 that exceeded the ozone NAAQS with

the highest concentrations being 0.222, 0.193, 0.190 and 0.187 ppm. Thus, this site was used as the "design value" site and determined the classification of the entire CMSA, as required by the Act.

Therefore, the entire Chicago CMSA is, by operation of law, classified as a severe ozone nonattainment area and the Act requires that all counties in the area must be included in the ECO program.

Comment

Several commenters are concerned that employer monitoring of the success of ECO plans cannot be determined with any degree of accuracy. The commenters note that employer monitoring is unreasonable and requires resources unavailable to most employers.

USEPA Response

Employers in Northwest Indiana will be required to evaluate the success of their ECO program 1 year after the initial plan submittal and annually thereafter. Employers will be required to resurvey their employees to calculate the APO attained. The survey and survey methods will be the same as the initial survey conducted, insuring consistency between surveys. Employers will receive computer software developed by Purdue University—Calumet to electronically calculate the APO and do crosstabulations.

During the year, employers can monitor participation in their programs to determine participation levels and whether there is a need to make program modifications. A variety of methods that are not beyond the means of Northwest Indiana employers can be used to monitor employee participation, including but not limited too: registering program participants; monitoring preferential parking; having supervisors complete weekly reporting forms; having employees complete weekly self-reporting forms; and conducting periodic surveys. The degree of accuracy in monitoring will be determined by the honesty of employees reporting how they are commuting. Since employees are not facing any penalties for not participating in an employer's program, there should be little incentive to be untruthful.

Comment

Several commenters are concerned that Northwest Indiana does not have a regional public transportation system in place. As such, most area employers do not have the option of encouraging or providing financial incentives to their employees to use transit. In addition, commenters note their concern over

potential safety problems from their employees using transit in high crime areas or walking several blocks along dark roads from bus stops.

USEPA Response

ECO provides an opportunity for employers to get involved in regional transportation planning issues. The Northwest Indiana Regional Planning Commission has proposed extensive improvements in the transportation network in Lake and Porter Counties. The Indiana Transportation Association, the statewide organization of public and private transit providers, is working with local transit agencies and state representatives to develop a legislative initiative for funding transit improvements statewide, including Lake and Porter Counties.

There are full-scale public transit systems in place in the cities of Hammond and Gary and a small transit system in the city of East Chicago that can provide alternatives for employees. Hammond Transit has recently extended its bus service on Calumet Avenue into the town of Munster. There are also a number of private transit companies willing to work with employers subject to ECO to provide subscription bus services.

The Congestion Mitigation and Air Quality (CMAQ) provision of the Intermodal Surface Transportation and Efficiency Act (ISTEA) is providing money that is enabling the transit agencies in Northwest Indiana to provide expanded service. These funds have enabled the region to launch a tricity link-up pilot project which involves the interconnection of bus services between the central business districts of Gary, East Chicago, and Hammond. This pilot project has proven extremely successful and will most likely be continued. The city of Gary has been doing a study of expanding transit service into the cities of Griffin, Highland, and Munster and linking up with the Hammond transit service in Munster. Gary Transit has recently submitted a proposal for CMAQ funds to run a pilot of the actual service. In addition, several new park-and-ride facilities, which will be staging areas for mass transit, vanpools, carpools, and subscription bus services, are being designed and will be paid for with CMAQ funds.

Concern over the lack of safety due to poor walking or safety conditions can be addressed by working with the appropriate entities to have lighting and walking facilities improved; relocating transit stops so they are closer to the worksite; or providing shuttle service from transit stops to the worksite.