



Board of County Commissioners

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October 27th, 2020

Dr. Will Toor
Executive Director
Colorado Energy Office
1600 Broadway, Suite 1960
Denver, CO 80202

Dr. Toor,

We wanted to thank you and your team at the Colorado Energy Office, and all of the dedicated individuals within the administration under the leadership of Governor Polis who contributed to the development of the draft GHG Pollution Reduction Roadmap. Also thank you for the opportunity to provide feedback on the Roadmap, which is an important step, providing a framework of how to achieve necessary carbon pollution reductions. Overall, we believe the GHG Reduction Roadmap is well done and comprehensive, with measurable targets along with strategies to achieve them.

Our community is on the front lines of climate change. We are experiencing the impacts of climate change first hand and in real time, and as an economy dependent upon winter recreation, have an enormity at stake. We are in the midst of our worst wildfire season ever, even while our communities are getting impacted by reduced snowpack, continued drought, and record high temperatures. We applaud the governor's leadership on climate action and call on him to continue his important work while bringing a renewed urgency and commitment to the challenge.

This is a critical moment. We request the administration bring a clear sense of urgency, with specific policies, toolkits, and enforceable deadlines, to ensure that we actually meet the identified targets.

We respectfully include the following comments on the draft Roadmap:

- The Roadmap mentions CFCs and HCFCs, and other non-energy emissions obliquely, however stronger emphasis on these areas from a policy perspective is recommended. For example, they are missing entirely from near term strategies list, yet are identified as the #1 GHG impact in Paul Hawken's [Drawdown](#).
- Beneficial Electrification is stated as a cost saving measure, yet the narrative discusses focusing on technologies, barriers, and case studies over the next 10 years to demonstrate efficacy in cold climates and cost effectiveness. Higher priority and clarification of detailed next steps would be helpful as part of this important strategy.
- A Local Government Toolkit for building electrification would be helpful to support best practices and consistency throughout the state. Southwest Energy Efficiency Project (SWEET)



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has developed [Building Electrification: How Cities and Counties are Implementing Building Electrification Policies](#). Building upon this to provide best practices and tools for local governments to adopt and implement would help drive beneficial electrification strategies with more consistency and efficiency.

- Soil health focus, including soil carbon sequestration, regenerative agriculture, sustainable ranching, etc. are also identified among the top 10 GHG impacts and opportunities in Paul Hawken's [Drawdown](#). The Roadmap mentions that such soil to atmosphere interactions are not currently quantified in Colorado. This should be a top near term strategy which could yield a much larger impact than is recognized in the current plan and positively engages our agricultural and ranching communities to support innovative replicable models for soil health and water conservation.
- More detail on how to support communities of color, income qualified and other frontline communities which are expected to be impacted disproportionately is recommended to ensure a just transition and embolden and engender a working class blue-collar movement surrounding climate action.
- Transportation strategies (p. 55) should include expanded mass transit / rail alternatives for the I-70 corridor, particularly incorporating options attractive and feasible for recreational use (skier shuttle, mountain bike shuttle, etc.).
- Commitment by the state and encouragement of others to convert fleets to EVs and buildings to all-electric is commendable. A toolkit to support local governments, businesses, and others to complete these initiatives and leverage assistance and incentives would be helpful to support the initiative and goal.
- Carbon pollution impacts should be strengthened as a market-based tool to recognize and quantify carbon pollution impacts to the community from policies, systems, land use development, etc. The Roadmap references the social cost of carbon as a potential reference point, and SB19-236 requires the state's utilities commission to use a social carbon cost of \$46 per ton beginning in 2020 when evaluating utility resource plans. Expanding this or a similar metric to other sectors seems as a logical next step to recognize and mitigate the calculated impact of a policy / transportation plan / fleet vehicle / potential gas tax / registration fee for personal vehicles etc.
- The recognition and nexus between land use planning and transportation demand management and reduction in vehicle miles traveled (VMTs) is commendable. Providing more detailed information for local governments, including a robust inclusionary housing strategy and toolkit, as well as incentives and assistance is recommended to achieve desired goals for



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land use planning and development is recommended.

- Oftentimes, mass transit, bicycle lanes, and other multimodal transportation alternatives may exist to a certain extent in our communities; however the interconnectedness of these systems, as well as safety of walking and biking conditions and street crossings, is often lacking. Dedicating part of the Roadmap to these crucial first-last-mile infrastructure needs should be included, along with dedicating funding to support them is recommended, as it can potentially offer high benefit at relatively low cost to communities for their incorporation.
- The Draft Roadmap does not clearly establish roles and responsibilities for accomplishing stated lagging target indicators, and lacks statewide or sector specific GHG caps. These would be helpful in setting program development goals, regulatory tools and timeframes, and prioritization thereof. The Roadmap needs both caps and strong regulatory backstops that ensure we meet the GHG emissions targets even if specific individual efforts underperform.

Again, we thank you for the opportunity to provide comments on the draft GHG Pollution Reduction Roadmap. We are certain that it will provide us the needed direction, specific strategies, and mechanisms to continue to drive our position nationally as leaders in climate action with clear benefits to the health, safety, and welfare of our communities within the great state of Colorado. We look forward to continuing to work with you proactively on such initiatives in the future.

Sincerely,

Kathy Chandler-Henry
Chair

Matt Scherr
Commissioner

Jeanne McQueeney
Commissioner