

May 21st, 2020

To the Air Quality Control Commission, Colorado Department of Public Health and the Environment, and the Colorado Energy Office:

Thank you for your ongoing leadership and efforts during these very challenging times of the pandemic, for your commitment to making our state 100% clean powered as Governor Polis championed with his 100% renewables pledge, and for undertaking the hard work to set Colorado on a path to achieve our climate goals. Now, more than ever, science matters, public health matters, and leadership matters, and we commend you for your work to center all of these, especially as state governments lead on the frontlines of the pandemic.

As you continue to take steps to protect and invest in our public health, environment, and economy, it is more important than ever for our state to prioritize ambitious and equitable solutions to climate change.

Almost exactly one year ago, Colorado passed historic climate legislation. HB19-1261 tasked the Air Quality Control Commission with creating rules that ensure that Colorado meets its greenhouse gas emission reduction targets as well as benefit disproportionately impacted communities. The law requires the Commission to adopt rules to reduce the state's greenhouse gas pollution at least 26% by 2025, 50% by 2030, and 90% by 2050 below 2005 levels and will ensure that, as the Governor raised in his 2020 State of the State, Colorado is a leader in doing our part to address climate change.

In order to meet the important target dates of 2025 and 2030, Colorado must put rules in place now to achieve the emissions reductions that the science says is necessary, and that were set into law by HB19-1261. It is essential that the Air Quality Control Commission take timely action to close the emissions gap, and that the Colorado Energy Office's Roadmap provides a clear path to achieve our state's goals, including an analysis of equity and front-line community benefits.

In addition, we are conscientious of and concerned about the impending July 2020 statutory deadline for the Air Quality Control Commission to propose regulations to meet the statutory emissions reductions targets.

We realize that both the Roadmap and your thinking about how to reach these targets are in the process of modeling and stakeholding, and want to support your work.

As you begin to design the path and rules to reduce Colorado's greenhouse gas emissions, we ask you to consider our comments on the baseline data, the policy mechanisms you model, and the resulting policy recommendations. We strongly believe that all of the outcomes of the state's Roadmap to climate action must be:

- **Verifiable** - Forthcoming rules should be measurable and specific, thereby illustrating they are capable of accurately meeting Colorado's climate goals. Quantifiable outcomes, strong reporting, and monitoring of progress are necessary components of the Roadmap, as is ensuring policies are cost-effective;
- **Enforceable** - Any policy or plan must include a backstop of enforceability, not just rely on voluntary measures or incentives; and
- **Equitable** - During the crisis set in motion by COVID-19, it is clear that people living on low incomes, communities of color, tribal and native communities, and rural communities are disproportionately impacted by this disease and by climate change. You can work to generate policy that relieves burdens on communities that have historically been impacted by pollution and poor air quality. Transitioning workers, reducing pollution hotspots, and identifying opportunities for financial investment in the hardest-hit communities are all encouraged.

Further, the urgency and vastness of the climate crisis — even with important progress and commitments there is a significant gap between Colorado's projected emissions and climate targets — means that the Roadmap must analyze a variety of policy mechanisms, including sector-by-sector policies, market mechanisms, and hybrids of the two. Without modeling a variety of policy mechanisms, we cannot understand the full extent of the implications to emissions reductions and communities.

An opportunity exists in the Roadmap process and the upcoming rulemakings for Colorado to emerge as a national leader on climate action and climate justice. We hope you'll take the above into consideration as you work urgently to respond to the climate crisis and support frontline communities. Thank you for all of your work and leadership.

Sincerely,

Adrienne Dorsey, Executive Director, GridAlternatives  
Ariana Gonzalez, Colorado Policy Director, Natural Resources Defense Council  
Bryce Carter, Colorado Program Director, Solar United Neighbors  
Danny Katz, Executive Director, CoPIRG  
Ean Thomas Tafoya, Colorado Water and Climate Organizer, GreenLatinos  
Emily Gedeon, Acting Chapter Director, Colorado Sierra Club  
Erin Overturf, Deputy Director, Clean Energy Program, Western Resource Advocates  
Hannah Collazo, State Director, Environment Colorado  
Ian Silveri, Executive Director, ProgressNow Colorado  
Jen Clanahan, Colorado Director, Mountain Mamas  
Jeremy Nichols, Climate and Energy Program Director, WildEarth Guardians  
Jim Ramey, Colorado State Director, The Wilderness Society  
Kate Stigberg, Senior Director of Activism, Healthy Air and Water Colorado  
Kelly Nordini, Executive Director, Conservation Colorado  
Kevin Cross, Spokesperson, Colorado Coalition for a Livable Climate  
Kristi Douglas, North Range Concerned Citizens  
Leslie Glustrom, Board Member, Clean Energy Action  
Lindsay Bourgoine, Policy and Advocacy Director, Protect Our Winters  
Marie Venner, Together Colorado and Co-Chair of Call to Action Colorado  
Mayane Barudin, Interior West Manager & Tribal Liaison, Vote Solar  
Micah Parkin, Executive Director, 350 Colorado  
Nicole Hensel, Executive Director, New Era Colorado  
Pam Kiely, Senior Director of Regulatory Strategy, Environmental Defense Fund  
Quinn Antus, Executive Director, Signal Tech Coalition  
Rebecca Curry, Colorado Policy Advocate, Earthjustice  
Salvador Hernandez, Colorado State Director, Mi Familia Vota  
Shaina Oliver, Field Organizer, Moms Clean Air Force  
Tracey MacDermott, Climate Reality, Denver-Boulder Chapter  
Will Roush, Executive Director, Wilderness Workshop