

INITIAL ECONOMIC IMPACT ANALYSIS

Date: October 8, 2020
To: Colorado Air Quality Control Commission
Subject: Alternate Proposal, Adoption of Regulation Number 23

WildEarth Guardians and 350 Colorado submit this economic impact analysis in support of their alternate proposal in the matter of the proposed adoption of Regulation Number 23.

WildEarth Guardians and 350 Colorado submit that there does not exist reasonably available data to analyze the economic impacts of their alternate proposal pursuant to § 25-7-110.5(4)(c) C.R.S. Nevertheless, pursuant to the Air Pollution Control Division's initial economic impact assessment for its proposed Regulation Number 23, it is believed that the costs of closing the Suncor oil refinery will be less than the costs of installing additional pollution controls to meet reasonable progress requirements under the Clean Air Act. As the Division stated in its initial economic impact analysis with regards to the proposed electric generating unit and coal mine closures:

These closures will result in class I area visibility improvements, emission reductions, and other environmental co-benefits, above and beyond any RP recommendations that do not consider closure options. The Division assumes that the cost of closure for these units is less than the aforementioned range of costs for potential controls for these units for the reasons articulated above.

Consistent with the Division's assumptions, it is reasonable to presume that considering co-benefits and the cost of controlling emissions, that closure of the Suncor oil refinery will be the less costly option for dealing with the facility's harmful air pollution.