BEFORE THE AIR QUALITY CONTROL COMMISSION
OF THE STATE OF COLORADO

IN THE MATTER REGARDING
PROPOSED REGULATION NUMBER 20:
COLORADO LOW EMISSION VEHICLE PROGRAM

PREHEARING STATEMENT OF
THE LOCAL GOVERNMENT COALITION OF
THE CITY OF ASPEN, BOULDER COUNTY PUBLIC HEALTH,
THE CITY AND COUNTY OF DENVER, EAGLE COUNTY PUBLIC HEALTH,
THE CITY OF FORT COLLINS, JEFFERSON COUNTY PUBLIC HEALTH,
THE CITY OF LAKEWOOD SUSTAINABILITY DIVISION, THE CITY OF LONGMONT,
AND THE COUNTY OF PUEBLO

The Local Government Coalition ("**LGC**") of the City of Aspen, Boulder County Public Health, the City and County of Denver, Eagle County Public Health, the City of Fort Collins, Jefferson County Public Health, the City of Lakewood Sustainability Division, the City of Longmont, and Pueblo County submits this prehearing statement in support of the Air Quality Control Commission's ("**Commission**") adoption of Regulation Number 20.

I. EXECUTIVE SUMMARY

The LGC supports the Air Pollution Control Division's ("**Division**") proposed Regulation 20, Colorado Low Emission Automobile Regulations, as a necessary action in light of the National Highway Traffic Safety Administration's ("**NHTSA**") and the Environmental Protection Agency's ("**EPA**") planned rollback of the light-duty vehicle emission standards. Regulation 20 would adopt California's criteria pollutant and GHG standards for light-duty vehicles, rules relating to evaporative emissions, on-board diagnostics, testing, accountability and reporting, and consumer protections to include vehicle warranty and recall provisions. This proposed regulation is consistent with the current federal standards, and therefore would not impose new requirements on the state, vehicle manufacturers, or dealers.

Vehicles are responsible for a significant portion of ozone precursor and carbon dioxide emissions in Colorado. With respect to ozone, 31% of nitrogen oxide ("**NO_X**") and 16% of volatile organic compound ("**VOC**") pollution in the Denver Metro/North Front Range ("**DMNFR**") non-attainment area is caused by on-road vehicle pollution.[1] The DMNFR continues to violate ozone standards, and due to ozone exceedances from this summer, the

[1] Moderate Area Ozone State Implementation Plan for the Denver Metro and North Front Range Nonattainment Area, at ES-3, https://raqc.egnyte.com/dl/q5zyuX9QC1/FinalModerateOzoneSIP_2016-11-29.pdf_.

region is faced with reclassification to serious nonattainment after 2019.[2] As Colorado's air quality continues to deteriorate, the state cannot afford a federal rollback of vehicle emissions standards that will worsen conditions. Because of the adverse impacts Colorado citizens already suffer from vehicle emissions under current conditions, the state must ensure that such emissions are reduced. Consequently, the LGC urges the Commission to adopt Regulation 20 to stay on track with modern emissions controls to preserve the public health of this growing state.

II. STATEMENT OF FACTUAL AND LEGAL ISSUES & LGC'S POSITION

A. ADOPTING REGULATION 20 WILL SECURE THE EXISTING PATH TOWARDS REDUCING VEHICLE EMISSIONS IN COLORADO

If Colorado adopts California's low emission vehicle ("**LEV**") program via Regulation 20, the state will maintain the health and climate benefits it is striving for by reducing vehicle emissions of carbon dioxide equivalent ("**CO_2e**") while also achieving reductions in ozone-forming pollutants (such as VOCs and NO_X) and reductions in fine particulates ("**$PM_{2.5}$**") and sulfur oxides ("**SO_X**"). The adoption of Regulation 20 will counter the proposed rollback of the federal vehicle emission standards to a constant 36.9 miles per gallon, for model year ("**MY**") 2021 and beyond. The federal rollback would result in additional emissions of nearly 2.6 million tons CO_2e per year by 2030 and over 4.5 million tons per year by 2040.[3] While the Division's Initial Economic Impact Analysis predicts a lower increase in emissions from the proposed federal rollback, with 2.1 million tons of increased CO_2e in 2030, the Division also notes that this "does not take into account increased upstream emissions resulting from less fuel efficient motor vehicles."[4]

If Colorado does not adopt Regulation 20 and the proposed federal rollback is finalized, the increase in criteria air pollutants in Colorado will be on the order of 438 tons per year of VOC and 105 tons per year of NO_X by 2030 and 627 tons per year of VOC and 195 tons per year of NO_X by 2040. *See* Table 1; Exhibits A and B.

Table 1. Criteria Emissions Reductions in Colorado – Relaxation of the Current Federal GHG Program to 2020 Levels (U.S. tons per year)[5]

	VOC	**NO_X**
Total in 2030	438	105
Total in 2040	627	195

[2] CDPHE, Air Pollution Control Division, "Ozone Summary Table: 2018 8-Hour Ozone (Updated through September 30, 2018)," https://www.colorado.gov/airquality/html_resources/ozone_summary_table.pdf.
[3] Rykowski, Richard, "The Benefits of Protective Advanced Clean Car Standards in Colorado: An Examination of Cost Savings, Greenhouse Gas Emission Reductions, and Health Outcomes," commissioned by Environmental Defense Fund, May 2018, at 28, https://www.edf.org/sites/default/files/content/The_Benefits_of_Protective_Clean_Car_Standards_CO.pdf.
[4] APCD, Initial Economic Impact Analysis for Proposed AQCC Regulation Number 20: Low Emitting Automobile Regulation, August 16, 2018, at 1.
[5] Rykowski at 32.

Because the federal vehicle emissions standards are incorporated in the ozone State Implementation Plan ("**SIP**") for the DMNFR, a rollback of these standards would result in increased ozone precursor emissions in the nonattainment area. If the federal rollback is finalized and Colorado does not adopt Regulation 20, the ozone SIP will need to be revised to reflect higher vehicle emissions in the future than those already included in the SIP's emissions projections. Such an action would be unacceptable in an area that is not currently achieving pollution reduction goals.

B. ADOPTING REGULATION 20 IS NECESSARY TO PROTECT PUBLIC HEALTH IN COLORADO

The adverse effects of vehicle pollution on everyone who breathes—especially on the old, the young, and those disadvantaged by health or socioeconomic conditions—is well-documented. Near-roadway air pollution disproportionately impacts low-income communities and communities of color, children, older adults, people with preexisting cardiopulmonary disease, and children whose homes or schools are located near highways. The EPA states that "[p]eople who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic."[6] Weakening federal vehicle emissions standards will exacerbate these adverse effects, including higher rates of illness and premature mortality due to cardiovascular and respiratory disease.

Research by the Health Effects Institute concludes that sufficient evidence exists to support a relationship between exposure to traffic-related air pollution and the exacerbation of asthma. This research also finds "suggestive evidence of a causal relationship with onset of childhood asthma, nonasthma respiratory symptoms, impaired lung function, total and cardiovascular mortality, and cardiovascular morbidity…"[7] In addition to near-roadway air pollution, impacts also exist from the fuel production process, also called "upstream" emissions. This emissions category includes the extraction, refining, and transport of fossil fuels for traditional vehicles, and also contributes to adverse air quality impacts on public health in Colorado.

EPA's CO-Benefits Risk Assessment model[8] estimates the health impacts of changes in air pollution levels under varying scenarios. Table 2 below identifies the health disbenefits of a federal rollback and the potential benefits of adopting the Advanced Clean Cars Standards. Because the model primarily analyzes health impacts due to changes in ambient $PM_{2.5}$ (which includes the PM precursors, NO_X and SO_X), this estimate does not include the significant impacts from ozone or greenhouse gases, and therefore underestimates the potential impacts. The monetized value of the additional health costs due to increased ambient $PM_{2.5}$ alone in Colorado would be $3 to $7 million per year in 2030 and $6 to $15 million per year by 2040. *See* Table 2; Exhibits A and B.

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[6] EPA, https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health

[7] Health Effects Institute, Special Report 17, *Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects*, January 2010, Executive Summary at 10, https://www.healtheffects.org/system/files/SR17TrafficReview_Exec_Summary.pdf

[8] https://www.epa.gov/statelocalenergy/co-benefits-risk-assessment-cobra-health-impacts-screening-and-mapping-tool

Table 2. Changes in Health Due to Changes in Emissions in Colorado from COBRA Using Base 2025 Emission Inventories[9]		
	Relaxation of the 2022-2025 EPA GHG Standards (shown as additional health costs to Colorado	**Advanced Colorado Clean Car Program** (shown as health savings to Colorado)
Value of Health Benefits in 2030	-$3 to -$7 million	$6 to $13 million
Value of Health Benefits in 2040	-$6 to -$15 million	$16 to $37 million

The analysis of the federal rollback included in NHTSA's draft Environmental Impact Statement ("**DEIS**") explains that "Adverse health impacts would increase nationwide . . . under the proposed regulation."[10] In fact, all of the alternatives analyzed as part of the DEIS would result in increased premature mortality, increased acute bronchitis, increased "work-loss days," and increased respiratory-related emergency room visits.

C. ADOPTING REGULATION 20 IS NECESSARY TO MITIGATE THE IMPACTS OF CLIMATE CHANGE IN COLORADO

Increasing scientific evidence demonstrates that carbon dioxide and other greenhouse gases released into the atmosphere are exerting a profound effect on the earth's climate, increasing extreme weather events, changing rainfall and crop productivity patterns, and fueling the migration of infectious diseases. Since 1983, average temperatures in Colorado have risen 2□ F and continue to rise.[11] Climate change will impact the health of those who live, work, and play in Colorado and around the globe. The October 8th, 2018 report by the United Nations' Intergovernmental Panel on Climate Change confirms that we have precious little time to reverse this trend.[12] Reducing greenhouse gas emissions as quickly as possible must therefore be a top priority in this decision. Many Colorado communities are already experiencing the impacts of a warming climate in the form of reduced snowpack, earlier snowmelt, increased risk of high-intensity wildfires and their associated air pollution, extreme weather events, and an increased number of "high heat" days.

[9] Rykowski at 34.
[10] NHTSA, Draft Environmental Impact Statement for The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Year 2021–2026 Passenger Cars and Light Trucks, July 2018, Docket No. NHTSA-2017-0069 (DEIS), at 4-46.
[11] Western Water Assessment, Cooperative Institute for Research in Environmental Sciences (CIRES), University of Colorado Boulder, Climate Change in Colorado: A Synthesis to Support Water Resource Management and Adaptation, 2014, http://wwa.colorado.edu/climate/co2014report/Climate_Change_CO_Report_2014_FINAL.pdf.
[12] http://www.ipcc.ch/report/sr15/.

Far from being a problem of the future, climate change is impacting Coloradans now in a number of ways. Poor air quality aggravates cardiovascular, respiratory, and allergy-related illness and leads to: 1) more doctor or hospital visits for asthma caused by more frequent wildfires,[13] 2) increased length and severity of allergy seasons,[14] and 3) higher temperatures, leading to more high ozone days when air quality is poor.[15] Climate change also increases the risk of death, physical injury, economic insecurity and exposure, which can result from: 1) increased frequency and intensity of flooding and precipitation events,[16] 2) more intense wildfires that can destroy more homes, and 3) increased frequency and duration of droughts.[17] Rising temperatures and recent droughts in the region have killed many trees by drying out soils and enabling outbreaks of forest insects.[18] Dry forest conditions have increased the risk of forest fires.

In the coming decades, the changing climate is also likely to decrease water availability and agricultural yields in Colorado, impacting residents and farmers. Children, the elderly, people with weakened immune systems, and residents living in poverty are more vulnerable to heat-related illness. In the Denver area, the annual frequency of 100 degree days increased by more than 250% on average between 1967 and 1999. With continued high levels of greenhouse gas emissions, Denver could experience extreme heat similar to that in Tucson, Arizona.[19] Climate change is also associated with increased transmission and severity of waterborne and vector-borne diseases, including West Nile virus, Hantavirus, and tick-related diseases.[20]

In 2017, the Colorado Department of Local Affairs and the Denver Department of Public Health and Environment funded analyses of the likely future temperature extremes in Larimer County, Boulder County and Denver.[21] The study found that if emissions continue to rise, by mid-century the temperatures will increase from the historical average of 1-2 days per year over 100 degrees to 7 days per year. By the end of the century, the study estimates that a typical year would have 34 days over 100 degree temperatures, while unusually hot years could have over 70 days of these temperature extremes.[22]

Adopting Regulation 20 will help to meet the directives in Governor Hickenlooper's July 2017 Executive Order, which establishes a goal of reducing greenhouse gas emissions 26% by 2025 (as compared to 2005 levels).[23] The analysis in the recently updated Colorado Climate Plan relies on the current, more stringent federal clean car standards to meet this goal.[24] Without

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[13] https://www3.epa.gov/airnow/wildfire_may2016.pdf
[14] http://www.aafa.org/media/Extreme-Allergies-Global-Warming-Report-2010.pdf
[15] U.S. Global Change Research Program, The Impacts of Climate Change, chapter 3, https://health2016.globalchange.gov/
[16] https://nca2014.globalchange.gov/highlights/report-findings/extreme-weather/graphics/observed-us-trends-heavy-precipitation
[17] https://www.c2es.org/content/drought-and-climate-change/
[18] https://www.ucsusa.org/sites/default/files/attach/2014/09/Rocky-Mountain-Forests-at-Risk-Full-Report.pdf
[19] The Rocky Mountain Climate Organization, "Future Extreme Heat in the Denver Metro Area: A report to Denver Environmental Health," June 2017, http://www.rockymountainclimate.org/images/DenverHeatExtremes.pdf
[20] https://www.niehs.nih.gov/health/materials/a_human_health_perspective_on_climate_change_full_report_508.pdf
[21] http://www.rockymountainclimate.org/extremes/extremes_1.htm
[22] http://www.rockymountainclimate.org/images/DenverHeatExtremes.pdf
[23] https://www.colorado.gov/governor/sites/default/files/executive_orders/climate_eo.pdf.
[24] https://www.colorado.gov/pacific/sites/default/files/021518_REF_ColoradoClimatePlan.PDF.

Regulation 20, Colorado would find it difficult to meet the 26% reduction goal. Continuing a clean car program that includes the most stringent reductions possible is critical to achieving Colorado's climate commitments.

The potential impacts of reduced greenhouse gas emissions can be estimated using the social cost of carbon, as established by an interagency working group convened by EPA. The monetized benefits of the decreased emissions of greenhouse gases can then be estimated using the social cost of carbon.[25] Using the median values of $50 per ton in 2030 and $60 per ton in 2040, the cost savings in Colorado from reduced carbon emissions would be $121 million per year in 2030 and $260 million per year in 2040, in current dollars.

Table 3. Cost savings from Reduced Carbon Emissions in Colorado

	Median Carbon Values	**Total CO_2e Reductions**	**Cost Savings from Advanced Clean Car Standards**
2030	$50 per ton	2,424,219	$121 million per year
2040	$60 per ton	4,336,666	$260 million per year

D. Regulation 20 Is Economically Feasible

The clean car standards have demonstrated for years that it is both feasible and cost-effective for manufacturers to produce high-performing vehicles. Manufacturers continue to produce increasingly more efficient and advanced models that meet emissions standards and consumer needs, and consumers reap thousands of dollars in fuel cost savings. The 2016 midterm review for the 2022-2025 standards by EPA, NHTSA and California Air Resources Board concluded that "[a] wider range of technologies exist for manufacturers to use to meet the MY2022-2025 standards, and at costs that are similar or lower, than those projected in the 2012 rule."[26] Similarly, the Division states in its Initial Economic Impact Analysis that compliance costs have decreased, suggesting that "auto manufacturers have been successful in meeting the current standards while optimizing the use of new technology and methods for improving vehicle fuel efficiency at the same time as minimizing costs for that technology and those practices."[27]

In its Initial Economic Impact Analysis, the Division notes that "The average cost of a new vehicle sold in Colorado in 2017 is listed as $38,708 by [the Colorado Automobile Dealers Association]. Even with some growth in price due to inflation, the MY2025 compliance cost of $973 ($875 for MY2022-2025 and MY2021 added, all adjusted to 2018 dollars) is about 2.5% of the average 2017 retail vehicle price, a cost that is substantially less than the lifetime fuel benefit of $3412 for the vehicle."[28] The Division also states that Regulation 20 is cost effective because

[25] https://19january2017snapshot.epa.gov/climatechange/social-cost-carbon_.html.
[26] Draft Technical Assistance Report: Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards for Model Years 2022-2025 (July 27, 2016).
[27] APCD, Initial Economic Impact Analysis, at 2.
[28] APCD, Initial Economic Impact Analysis, at 5.

there would be reductions in cost and CO_2e compared to a finalized rollback of the federal regulations.[29]

III. LIST OF ISSUES TO BE RESOLVED BY THE COMMISSION

The LGC asks the Commission to resolve the issues set forth in Section II above.

IV. EXHIBITS

The LGC has attached the following exhibits to its Prehearing Statement and reserves the right to identify additional exhibits based upon information presented in the prehearing statements of the Division or other parties:

A. **Exhibit A**: Boulder County Public Health, Denver Public Health, Denver Public Health and Environment, and Jefferson County Public Health, "Protecting Our Communities from Air Pollution: Health Risks of Proposed Rollbacks to the Federal Clean Car Standards and the Benefits of Adopting Advanced Clean Car Standards," May 2018. https://assets.bouldercounty.org/wp-content/uploads/2018/06/colorado-clean-car-standards-report.pdf.

B. **Exhibit B:** Rykowski, Richard, "The Benefits of Protective Advanced Clean Car Standards in Colorado: An Examination of Cost Savings, Greenhouse Gas Emission Reductions, and Health Outcomes," commissioned by Environmental Defense Fund, May 2018, https://www.edf.org/sites/default/files/content/The_Benefits_of_Protective_Clean_Car_Standards_CO.pdf.

V. WITNESSES & WRITTEN TESTIMONY

While the LGC does not intend to offer any written testimony beyond what is contained in the prehearing, rebuttal, and associated filings, the LGC intends to call the following witnesses at the rulemaking hearing:

A. Cindy Copeland, Air Quality Specialist, Boulder County Public Health: Testimony in support of the LGC prehearing statement, including discussion of Exhibit A, the local government report on "Protecting Our Communities from Air Pollution."

B. Mike Salisbury, Transportation Energy Lead, Denver Department of Public Health and Environment: Testimony in support of the LGC prehearing statement.

C. Jannette Whitcomb, Senior Environmental Health Specialist, City of Aspen: Testimony in support of the LGC prehearing statement.

D. Any other witnesses that may be needed for rebuttal purposes.

VI. TIME REQUESTED

The LGC requests a time allocation of 45 minutes for direct testimony, rebuttal testimony, and

[29] APCD, Initial Economic Impact Analysis, at 6.

cross-examination of other parties' witnesses.

VII. CONCLUSION

The LGC member governments appreciate the opportunity to participate in this proceeding, and respectfully request that the Commission adopt Regulation 20 as proposed by the Division in the August 24, 2018 Notice of Rulemaking Hearing.

Submitted this 9th day of October, 2018,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of October, 2018, an electronic copy of this **PREHEARING STATEMENT OF THE LOCAL GOVERNMENT COALITION** was delivered to the Air Quality Control Commission Office, VIA EMAIL ADDRESS TO cdphe.aqcc-comments@state.co.us and to the following:

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