



COLORADO CHAMBER OF COMMERCE

Lots of new things have emerged in the last week, both from the Colorado Energy Office and the Colorado Department of Public Health and Environment.

Colorado Carbon Management Roadmap: The Colorado Energy Office has finally released its [Carbon Management Roadmap](#). A pre-release version was provided to the Colorado Chamber in November and we understood at that time that it would have a 30-day public comment period, but this released version is just as final. It has sections on CO2 capture, transport, utilization and storage, technological carbon dioxide removal, nature-based carbon dioxide removal, market development and incentives, workforce, environmental justice, and community engagement. The Chamber is just diving into the report, but the purpose and legislative mandate section states:

“While Colorado’s primary strategy for mitigating climate change is deploying clean energy generation and utilizing that clean electricity in buildings, vehicles, and industry, carbon management will play an important role in helping the state decarbonize and achieve its net-zero target by 2050. Utilizing carbon management will create new opportunities for Colorado communities and businesses to test and scale strategies that can achieve significant emissions reductions in Colorado, across the country, and around the world.”

AQCC Published a Revised Draft Rulemaking Guidebook: The Air Quality Control Commission has published a revised [draft Rulemaking Guidebook](#) and associated material for public review and feedback. The draft guidebook was updated to reflect the Commission’s new [Procedural Rules](#). The purpose of the guidebook is to help the public and stakeholders; understand how air quality regulations are developed and adopted in Colorado and provide an overview of the Commission’s rulemaking process. The guidebook explains procedures and offers guidance for those who want to participate in the process. The draft guidebook is available for public comment until March 28, 2025. If you have any comments or thoughts and want to provide feedback to the Division via the Chamber, please email cwoodward@cochamberregaffairs.com.

CDPHE Releases New Modeling Guidelines: CDPHE released their new [modeling guidelines](#) for minor sources of air pollution on Monday, March 3. The updated guidelines clarify when modeling or a modeling determination is required in an air permit application, while further protecting people’s health and the environment. Most notably, the guidelines include more protective modeling thresholds for nitrogen oxides that apply to minor sources located in disproportionately impacted communities, including areas that are overburdened by air pollution and areas that do not meet federal health standards for ground-level ozone. More information can be [found here](#). Specifically, if you are in the non-attainment area and in a DIC, you have to perform modeling if your short-term emissions exceed of 0.46 lb/hr2 – very low number and modeling will be difficult to pass, likely leading to halted development in those areas.

Regional Air Quality Council” RAQC Indirect Source Rules: The RAQC held a working group on indirect source rules on February 24 and has requested feedback from stakeholders for each subgroup; however, the deadline was March 11. Their next meeting is on March 25 and their objective is to have some proposals to their board for either voluntary or regulatory programs by early to mid summer. They have three working groups (Universities and Airports, Warehouses, Entertainment and Recreation) papers submitted by Wild Earth Guardians, Green Latinos and Earthworks for regulatory programs and would also like to connect with universities, event venues and others listed in their preliminary papers. You can access these materials [generally here](#), meeting [materials here](#), and the google drive for comments are as follows:

1. Please submit any comments on the updated charge statements via the shared [Google Drive](#), including beginning to add in your thoughts about how to answer the questions listed under “Recommendation Elements.” Comments on the concept papers discussed last week (available in the Google Drive) are also welcome, as is submission of any alternate concepts of what an indirect sources program might look like.
2. Please share additional resources (facility sustainability plans, relevant research articles or data, etc.) by linking to them directly in the “Resources” section of the relevant charge statement, if they are already available online, or sharing them via email so that we can add them to the Drive. Several resources shared during and after the meeting are now available in the [shared Google Drive](#), including relevant journal articles and airport sustainability plans. These documents are now linked to in the “Resources” section at the end of each charge statement.
3. We welcome connections to/suggestions of additional stakeholders to involve in each work group in the “Stakeholders to Engage” section of the charge statements or via email introductions.

Register for the March 25 meetings ([here](#)). If you are interested in a chamber discussion on this topic or have some comments to share, please email cwoodward@cochamberregaffairs.com.

Producer Responsibility for Statewide Recycling: In accordance with HB22-1355 CDPHE set up a Producer Responsibility Program for Statewide Recycling that requires companies that sell products in packaging, paper products, to fund a statewide recycling system to recycle those materials. These companies have formed an independent non-profit organization to coordinate, fund and manage this statewide recycling system. They are currently accepting an application for a County Representative, and if you are interested – [you can apply here](#). They also have posted a Colorado Plan Proposal in February that is currently being discussed by the board, but ultimately will be open for public comment. This plan has revised some of the dates for data submittals that could potentially impact fees and we will be discussing at our upcoming Regulatory Council Meeting on March 31. The current plan and additional information can all be [found here](#).