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RMCO Comments on Update of Colorado Climate Plan

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The Rocky Mountain Climate Organization appreciates the opportunity to provide the following comments on the draft update of the Colorado Climate Plan.

These comments do not address actions to reduce heat-trapping emissions. With respect to that portion of the draft update of the Plan, RMCO supports the separate comments being submitted by Colorado Communities for Climate Action (which RMCO administers for the 15 local governments that are the current members of CC4CA).

We applaud the state government for the many ways in which the draft plan adds detail to actions that the state has underway and strategies it is considering in resilience and climate preparedness, particularly the incorporation of preparing for climate extremes and of emergency preparedness for increased risks of flooding in Section 2 (concerning water) and of considering health equity and environmental justice in Section 3 (concerning public health).

We also point out that this draft update remains primarily an accounting of state programs that are already underway, rather than an actual plan identifying new actions to achieve the goals that the plan enumerates. To the extent possible, we recommend that the draft update be revised before being finalized to comprise an actual plan of identified actions to achieve the goals stated in it – both quantified emission reduction goals and qualitative preparedness goals. To the extent that doing so is not now possible within the state government’s timeline for finalizing this document, we recommend that the update define a path forward for the state to identify and adopt such an actual plan.

Recommendations from the Colorado Local Resilience Project

We applaud the inclusion in Governor Hickenlooper’s July climate and clean energy executive order of the provision that addresses resilience actions: “That state agencies partner with local government to support locally-led climate goals and resilience solutions.” The recommendations of the Colorado Local Resilience project convened by the Colorado Climate Network and the Colorado Municipal League¹ provide a good framework for how that partnership could be enhanced. As noted in the draft update, the Local Resilience Project (LRP) gathered 78 representatives of 30 local governments to chart path forward to help improve the resilience of Colorado communities to climate-related risks. The 36 recommendations in the 2015 LRP report

¹ The draft update to the Colorado Climate Plan states (on page 13) that the Colorado Association of Ski Towns also had a role in the Local Resilience Project, but that is not correct. The draft also says that “the Rocky Mountain Climate Organization on behalf of the Colorado Climate Network” released the LRP report – but should instead say that the report was released on behalf of the project participants, or perhaps on behalf of CCN and CML (but not just CCN). Finally, a footnote on page 13 refers to the Report of The Colorado Local Resiliency Project, which should be Resilience rather than Resiliency. Despite our picking at these nits, we sincerely appreciate the state’s recognition of the project!

include many recommendations to bring about greater cooperation on climate preparedness between the Colorado state government and local governments.

Following the release of the LRP report, the Colorado Climate Network identified a few particularly high priority areas for implementation actions, including the three that follow. We urge that the Climate Plan be revised to explicitly identify state actions on these recommendations. They are:

State-local cooperation on public health preparedness

- Recommendation 23, that the Colorado Department of Public Health and Environment collaborate with local public health officials and others to determine how CDPHE can best factor climate-related risks into state public health programs and regulatory decisions.
- Recommendation 31, that CDPHE take the lead in convening an annual workshop involving state and local health officials and other experts to review the latest information on climate-change-driven public health risks and implications for action in Colorado.
- Recommendation 39, that the Colorado state government lead a collaborative process, with input from local health departments and others, to (1) assess the existing capacity of state and local health departments and other relevant organizations to reduce climate-related risks to public health and (2) develop proposals for increasing that capacity as necessary.

Since these specific recommendations were developed, there have been many indications of growing awareness of the need for and interest in further state-local cooperation on public health preparedness.

The Colorado Department of Local Affairs commissioned reports by RMCO on projected increases in future extreme heat and extreme storms in Larimer and Boulder counties; although the purpose of these reports was to help local governments prepare for future increases in flooding and wildfires, the projected increases in extreme documented in those reports are perhaps even of greater relevance in underscoring how much more vulnerable Coloradans will soon be to the health effects of heat waves. A similar but even more encompassing RMCO report commissioned by the Denver Department of Environmental Health documented projected increases in extreme heat for the overall Denver metro area.

Denver Environmental Health, Boulder County Public Health, the City and County of Broomfield, Denver Public Health, Jefferson County Public Health, and Tri-County Health Department have recently formed a Metro Denver Partnership for Health, which in turn has set up a new Climate Change and Health Workgroup to increase awareness of the impact of climate change on health across the metro Denver region through capacity building, policy development, and outreach.

The Colorado Association of Local Public Health Officials has also expressed new awareness of climate change/public health risks and new interest in collaborative preparedness actions to address those risks.

All of these new developments further underscore the need for concrete actions to address climate-change-related risks to public health, along the lines of the recommendations from the Local Resilience Project. RMCO recommends that the updated Colorado Climate Plan define a more detailed path forward to assess and address these risks. We believe that cooperation and

collaboration among the state government, local governments, and local public health agencies should be the foundation of this path forward.

Natural resources vulnerability assessments

- LRP recommendation 21 calls for the preparation of a comprehensive, detailed, and quantified assessment of climate-related risks to natural resources and recreation in Colorado.

This new, ongoing process would build on the Colorado Climate Change Vulnerability Study by the University of Colorado Boulder and Colorado State University for the state government. The new work could assess increases in wildfires, insect infestations, and other ecosystem disturbances; decreases in forest extent and the ranges of aspens and other tree species; impacts to skiing and other snow-based recreation, rafting and kayaking; and risks to hunting and fishing. Involvement by the Colorado Department of Natural Resources would be essential in bringing about these assessments, but universities, not the state government, could possibly have the lead roles. Engagement by local governments and other stakeholders would help ensure that the information would have practical application by decision makers. Federal agencies, beginning with the U.S. Forest Service (which manages half of Colorado's forested land), are potential participants and funders. The assessments of climate-related risks to natural resources, recreation, and tourism might be in the form of a single comprehensive report, or in an ongoing process of multiple studies.

As discussed in a meeting at the Department of Natural Resources among DNR officials and key participants in the LRP natural resources and outdoor recreation workgroup, a key, or perhaps initial, focus of this further vulnerability assessment could be how climate change will increase the state's wildfire risks.

Climate change clearinghouse

- Recommendations 26 and 27 of the LRP urged that the Colorado state government catalogue and distribute information to help local governments develop and implement effective preparedness actions, including through a comprehensive online clearinghouse of information on climate change, climate impacts, and climate actions in Colorado, for the use of local governments and others.

That online clearinghouse could help local governments and others readily obtain the information they need on climate change and its risks and on actions that are possible or have succeeded elsewhere to address them. This would make it easier for local government program staff members and other stakeholders to take advantage of the research and activities of others in charting a path forward to assess and address the new risks posed by climate change. Such a clearinghouse would give structure to and actualize a strategy identified in the draft Climate Plan at Section 9.4: "Promote safe, resilient, and sustainable communities by providing holistic data, information, and best practices to support local decision making in areas such as addressing vulnerabilities, risk, economic stability, development patterns, housing affordability and availability, transportation, resource conservation, and avoidance of development in high-hazard areas."

Preparedness Actions for the Water Sector

The water section of the draft update of the Colorado Climate Plan understandably and appropriately relies heavily on previous state government reports and plans and actions, including Colorado's Water Plan (2015). We acknowledge and applaud that the draft update in some respects does provide new information and new possible actions. For example, as mentioned at the top of these comments, the draft update includes new information on preparing for climate extremes and of emergency preparedness for increased risks of flooding.

We also strongly support the new statement in the water section of the need for investing in and maintaining a comprehensive climate-monitoring network for Colorado to provide complete and accurate data to compare to the projected changes, upgrading our current patchwork of unevenly distributed monitoring stations to a comprehensive system designed to measure weather events at a county or sub-county level. RMCO will add our support to the effort to achieve such an upgraded climate-monitoring network.

In other instances, too, we believe the Colorado Climate Plan can and should go beyond existing state reports, plans, and actions. In particular, we reiterate several of the comments RMCO made when Colorado's Water Plan was being developed, as we believe these points remain relevant and should be the subject of explicit commitments for new state actions that could be included in the final updated climate plan. The additional specifics we recommend are:

- To include in the climate plan commitments that the state government will quantify details on two key inputs to the water plan and actions under it that currently lack sufficient details—the scenarios of possible futures, and the analysis of how climate change may impact future demands for water. Both of these quantifications elements should be foundational to the upcoming update to the Statewide Water Supply Initiative.
- To establish an overall framework and process for further consideration by the basin roundtables of how their initial basin implementation plans would contribute to addressing or not addressing the state's projected M&I water gap in the quantified scenarios, based on and incorporating the quantified scenarios of future climate change and water impacts (including on water demands).
- To establish a new, open process to address Colorado's vulnerability to future curtailments under interstate compacts—a vulnerability that is greatly increased because of climate change impacts—and how the state government will prepare for and address these increased risks.

We appreciate the opportunity to provide these comments.