



COLORADO
Department of
Transportation

DATE: February 16, 2022

TO: Transportation Commission

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SUBJECT: Policy Directive Development - GHG Mitigation Measures &
Update on Compliance with GHG Pollution Reduction Standard

Purpose

This memo provides an update on the status of the development of the Policy Directive on GHG Emissions Mitigation Measures and an update on the progress towards compliance for the Greenhouse Gas (GHG) Pollution Reduction Standard for Transportation Planning.

Action

N/A

Background

As outlined in the Rule, approved by the Commission in December, Section 8.02.4: “By May 1, 2022, CDOT in consultation with the MPOs shall establish an ongoing administrative process and guidelines, through a public process, for selecting, measuring, confirming, verifying, and reporting GHG Mitigation Measures.” CDOT staff intend to bring a “Mitigations Policy Directive” to the Transportation Commission for approval at the April Commission meeting. This workshop, and a planned March workshop, are intended to share progress on the development of this important policy.

Details

CDOT staff has been working with the Ad Hoc Agency Coordination Committee to develop the GHG Mitigation Policy Directive. Staff has also been continuously working

with the Metropolitan Planning Organizations and other stakeholders to discuss modeling and GHG Mitigation measures/methodology.

CDOT has made significant progress since the GHG Rule adoption including modeling work, formation of the Interagency Coordination Team (IACT), preparing draft Mitigation Policy Documents, and working with other states who are interested in learning more about the GHG Rule.

Additionally, with the leadership of the Ad Hoc Agency Coordination Team, CDOT is developing a Draft Policy Directive which provides an overarching framework which explains the process for determining, validating and tracking mitigations. A parallel Procedural Directive will list the specific mitigations and calculation procedures.

Next Steps

Development of this Policy Directive is an important piece of the implementing the GHG Rule. By October 1, 2022, CDOT must update their 10-Year Plan, DRCOG and NFRMPO will update their Regional Transportation Plans (RTP) pursuant to the requirements of the rule and demonstrate compliance with the GHG reduction levels. Each agency must submit a GHG Transportation Report to the Commission, demonstrating the emissions analysis for their regions and if necessary, a Mitigation Action Plan which details mitigation measures used to help them meet their reduction levels.



GHG Pollution Standard for Transportation Planning

Transportation Commission - February 2022



- 1. Current Schedule and Milestones**
- 2. Progress Since Rule Adoption**
 - Modeling Work
 - Interagency Coordination Team (IACT) formation
 - States reaching out to us (CA, WA, OR, NM)
 - Preparing Mitigation Policy Documents
- 3. Mitigation Development**
 - Structure
 - Stakeholder Outreach
 - MPO Input and Key Issues



Progress Since Rule Adoption

GHG Modeling Timeline

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Review Baseline Projects	█	█										
Coding Baseline Network	█	█										
First round of baseline model runs		█	█									
Baseline GHG Analysis- Moves Runs			█									
TC adopts the GHG Mitigation Policy				█								
TPRs/MPOs submit updated 10 Yrs Plans		█	█	█								
1st round of GHG Compliance model runs				█	█							
1st round of GHG Analysis- Moves Runs				█	█							
Second round of GHG Compliance model runs					█							
2nd round of GHG Analysis- Moves Runs					█							
Submit GHG results to APCD for verification (May 31)					█							
Submit GHG Transportation Report and Mitigation Action Plan (if applicable) to TC						█						
Draft Review 10-Year Plan						█						
STAC Review and TC Approval of 10-Year Plan							█					



Mitigation Development

DRAFT	January 2022	February 2022	March 2022	April 2022	May 2022
Strategy Steps for GHG Mitigation Policy					Policy in place
Ad Hoc Update					
Bi-Monthly meeting with Working group					
Environmental Groups					
Additional Stakeholder Involvement					
STAC					
TC		Workshop	Workshop	Final Policy Directive	



Modeling Approach

- Model current 10-year plan (“baseline” or “no action”)
- Regions/TPRs/planners develop an updated plan (“compliance” or “action” run)
- CDOT model covers the entire state
- CDOT responsibility under the GHG rule covers only non-MPO areas
- Modelers “subtract out” MPO areas to calculate GHG totals in the rest of the state



Progress Since Rule Adoption

Interagency Consultation Team (IACT) Formation

- “Works collaboratively and consults appropriately to approve modifications to Regionally Significant definitions, and address classification of projects as Regionally Significant, modeling assumptions, and projects that reduce GHG emissions”
- First meeting Feb. 10
- **Members**
 - John Adams, PACOG
 - Suzette Mallette/Medora/Becky, NFRMPO
 - John Liosatos, PPACG
 - Dana Brosig, GVMPO
 - Ron Papsdorf, DRCOG
 - Clay Clarke (CDPHE)
 - Kelly Blynn (CEO)
 - Rebecca White (CDOT)



Rule outlines GHG Mitigation Measures

- 1.18 Greenhouse Gas (GHG) Mitigation Measures - **non-Regionally Significant Project** strategies that reduce transportation GHG pollution and help meet the GHG Reduction Levels.
- 8.02.4 **By May 1, 2022**, CDOT in consultation with the MPOs shall establish an ongoing administrative process and guidelines, through a public process, for selecting, measuring, confirming, verifying, and reporting GHG Mitigation Measures. CDOT and MPOs may incorporate one or more GHG Mitigation Measures into their plans in order to assist in meeting the Regional GHG Planning Reduction Levels in Table 1. Such a process and guidelines shall include, but not be limited to, how CDOT and MPOs should determine the relative benefits and impacts of GHG Mitigation Measures, and measure and prioritize localized benefits to communities and Disproportionately Impacted Communities in particular. The mitigation credit awarded to a specific solution shall consider both regional and community benefits.
- 8.02.6.3 If GHG Mitigation Measures are needed to count toward the GHG Reduction Levels in Table 1, the MPO or CDOT may submit a **Mitigation Action Plan** that identifies GHG Mitigation Measures, if any, needed to meet the GHG Reduction Levels within Table 1. The Mitigation Action Plan shall include ...Sections



GHG Mitigation Policy/Procedural Development

- Policy Directive
 - Overarching framework
 - Explains intent of mitigations
 - Scoring criteria
 - Define regionally significant for CDOT
- Procedural Directive
 - Lists actual GHG Mitigation Measures
 - How to calculate GHG impact of mitigation measure
 - Actual scoring matrix



Core Sections of the GHG Mitigations Policy Directive

Policy Directive Draft Conceptual Approach

- **Selecting GHG Mitigation Measures**
 - Understanding what parameters are important in order to quantify GHG emissions
- **Scoring framework for the GHG Mitigation Measure**
 - Allows for ranges of emissions for each mitigation
 - Could create incentives (higher score) for applying reductions to DI communities, earlier action, other elements
- **Developing a Mitigation Action Plan**
 - What needs to be included to show progress
- **Submitting a GHG Status Report**
- **Process for approving New GHG Mitigation Measures**
 - Over time new measures may come to the forefront
- **Process for analyzing the efficacy of Existing Mitigation Measures**
 - Identifying some on the ground metrics that would help show that the measures are making an impact over time.



MPO Input and Key Issues

- Autonomy vs centralized evaluation
- Phased approach to approving mitigations
- Scoring
- Equity multiplier



Calculating GHG impact of Mitigation Measures

- Compiled GHG emission formulas for over 40 mitigation measures in 8 categories:
 - Transit
 - Land Use
 - Ped/Bike
 - Parking Management
 - Med/Heavy ZEV
 - Clean Construction
 - TDM
 - Operational
- CDOT modeling team: Are these mitigation measures best suited for off model calculations? Or can they be incorporated into transportation models?
- Spreadsheet being contributed to by two consulting firms: WSP and Cambridge Systematics, and other stakeholders