

INDIRECT SOURCE EMISSION CONTROL PROGRAM DEVELOPMENT

**DENVER REGIONAL COUNCIL OF GOVERNMENTS
TRANSPORTATION ADVISORY COMMITTEE (TAC)**

**KYRA REUMANN-MOORE
TOM MOORE
MIKE SILVERSTEIN
KELLEY GRUBBS**

FEBRUARY 24, 2025



RECAP OF FALL 2024 – WINTER 2025 MEETINGS TO DATE

INDIRECT SOURCES EMISSION REDUCTION TECHNICAL WORK GROUP

INDIRECT SOURCE DEFINITIONS

Indirect Sources of Pollution - Facilities or installations that cause substantial mobile emissions activity



Common Examples:

- Warehouses
- Industrial or commercial developments
- Residential structures
- Construction sites

TRADITIONAL AIR POLLUTION CONTROL METHODS AND INDIRECT SOURCE METHODS

Traditional Air Pollution Control

Sets emission limits on individual stationary or mobile sources

Well established and successful programs

Does not address the growth in the number of individual emission sources

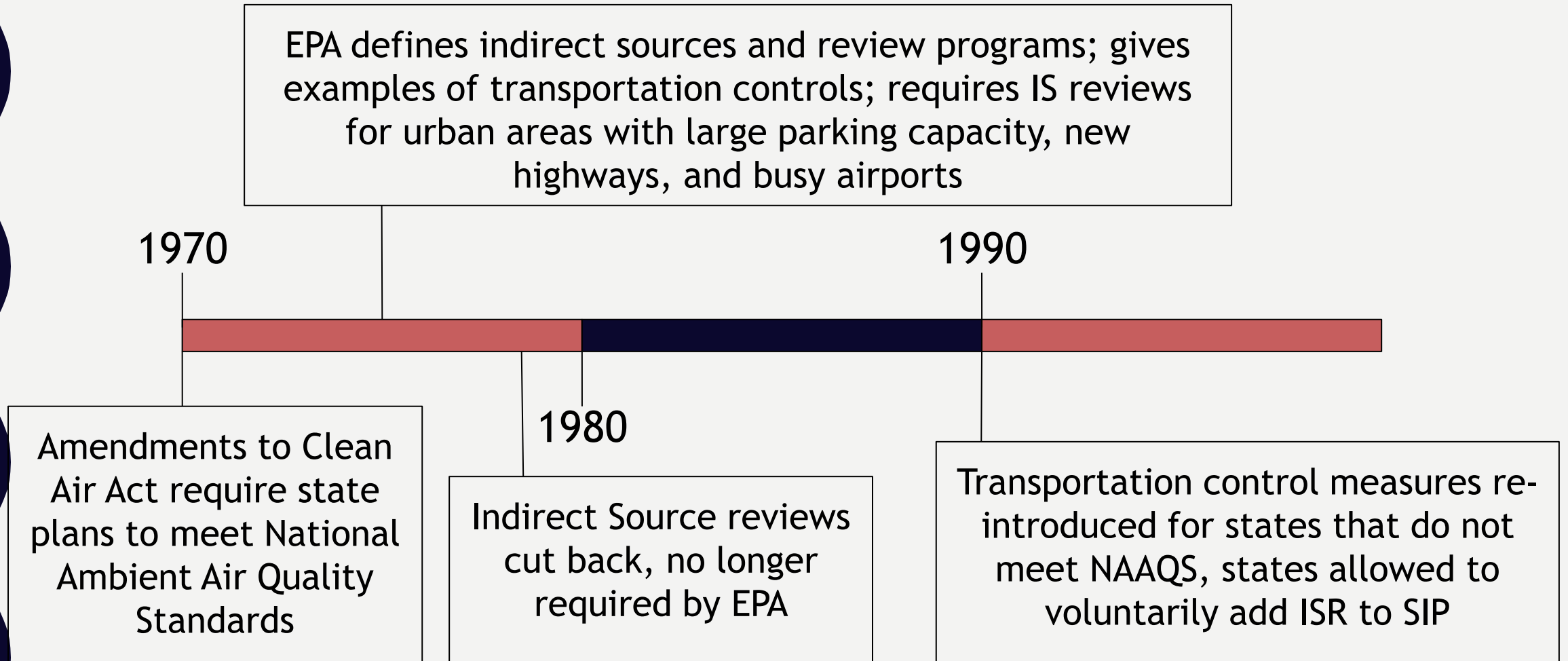
Indirect Source Regulation

Does not tackle individual vehicle emissions, but the collective emissions from existing VMT and projected growth

Regulates developments to reduce emissions from construction and operation



FEDERAL ISR HISTORY





STATE IMPLEMENTED INDIRECT SOURCE PROGRAMS OVERVIEW

Existing State ISR Programs

- South Coast, California*
- San Joaquin Valley, California*
 - Oregon
- Washington D.C.*

* Ozone and/or PM2.5 nonattainment areas



RAQC WORK GROUP EFFORTS TO DATE

INDIRECT SOURCE EMISSION REDUCTIONS WORK GROUP MEETING RECAPS

Fall 2024 meeting goals:

- Indirect sources presentations:
Understanding where we are, what work has been done so far, and options to explore going forward
- Introductions of interested stakeholders, sharing of perspectives, and discussion

<https://raqc.org/subcommittee/control-strategy-committee-indirect-sources-work-group/>

September, October, and December meeting topics:

- Background information
- Existing Indirect Source Program presentations
- Stakeholder perspectives
- Discussions on the above, as well as:
 - Group goals
 - Possible topics at future meetings
 - Engaging relevant stakeholders
 - Q&A

FALL 2024 WORK GROUP PRESENTATIONS

- RAQC staff presentations
 - Background on Indirect Sources in Colorado and the Interagency Indirect Sources Project
 - San Joaquin Valley Indirect Source Review Program
 - Legal considerations
 - Data analysis considerations
- Existing programs
 - South Coast Air Quality Management District: WAIRE Program
 - California Air Resources Board: Zero Emission Forklifts
- Stakeholder perspectives
 - Dr. Jana Milford, University of Colorado Boulder
 - Earthjustice
 - Southwest Energy Efficiency Project
 - Denver Airport
 - Boulder County
 - North American Council for Freight Efficiency
 - Metropolitan Planning Organizations
 - GreenLatinos
 - Colorado Motor Carriers Association

WORK GROUP NORMS

Initial list from first work group meeting

- Stay engaged
- Clarify on whose behalf you are speaking
- Share the airtime
- Expect and accept non-closure
- Be accountable
- Evaluate our time together

Additional norms from Mentimeter

- Respect each other and our time together
 - Collect feedback and answer questions offline where needed
 - Stay on topic
- Work collaboratively
 - Share information and build on others' information
- Engage diverse groups of stakeholders
- Share agendas in advance
- Focus on tangible emissions reductions solutions
 - Differing opinions on what this looks like: near-term programs; SIP-eligible strategies; voluntary actions and incentive programs



WORK GROUP GOALS EMERGING FROM FALL 2024 MEETINGS

- Identify and review existing Indirect Source Rules or Programs in other regions around the country
- Identify potential benefits and roadblocks for establishing various types of Indirect Source Emissions Reductions (ISER) Programs in the Denver Metro/North Front Range
- If appropriate measures are developed, work together on a proposed framework to establish a program in the DM/NFR

Raised by work group participants:

- Understanding indirect source program costs and benefits
- Developing tangible solutions, making them federally enforceable in the SIP
- Ensuring a collaborative process

WHAT STAKEHOLDERS SHOULD WE SEEK TO ENGAGE?

WHO CAN YOU HELP US CONNECT WITH?

- Community and environmental groups
 - GreenLatinos*
 - Other environmental justice groups
- Industry
 - Warehouse owners and operators*
 - Trucking industry*
 - Low/zero-emissions heavy equipment manufacturers (forklifts, yard tractors, etc)
 - Freight carriers
 - Agriculture
 - Travel reps*
 - Other affected parties*
- Government
 - State – CEO, CDOT*
 - Other local governments*
 - Commerce City
 - Denver DOTI
 - City/county zoning/land use planning
- Transit & transportation
 - RTD and other transit providers*
 - Transportation MPOs*
 - Northeast Transportation Connection and other TMA
 - Railroads*
 - Multimodal operators

Please help us connect with stakeholders!

** = invited to participate in work group*



WORK GROUP PROCESS AND TIMELINE

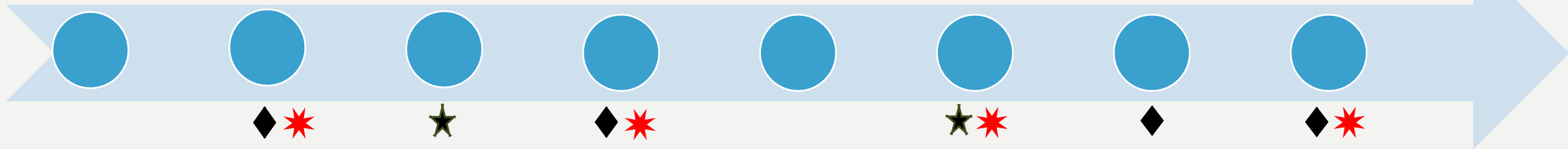


CSC AND BOARD CONTROL STRATEGY CONSIDERATION TIMELINE

- ★ = month for Quarterly Ozone Attainment Fora
- ◆ = review slate of Control Strategies at CSC meetings
- ✳ = Milestone check-in on slate at Board meetings

CSC: Discuss/check in on one or more potential control strategies in more depth

CSC: Discuss slate of strategies ahead of June RAQC Board endorsement and July AQCC submission



November 2024

◆ ✳
December

★
January 2025

◆ ✳
February

March

★ ✳
April

◆
May

◆ ✳
June

Ongoing discussion and input on potential strategies; no final decisions until June

Board consideration and strategy deep-dive presentations at RAQC Board meetings in parallel and as follow up to CSC consideration and discussions

Final Board discussion and slate endorsement

Indirect Source Emission Reductions Technical Work Group meetings in parallel to CSC & Board consideration



STRATEGIES IN DEVELOPMENT AS PART OF A SLATE TO **SUSTAIN OZONE MAINTENANCE**

Potential new emission reductions via longer-term strategies in the 2027 through 2030 timeframe

(Regulations to be adopted by AQCC by end of 2026, include options for phased approaches)

- Mobile source emission targets
- **Indirect source emission reductions**
- Zero-emission forklifts
- Addtl. new strategies to be proposed

Adopted regulations on-the-books reducing emissions in the 2027 through 2030 timeframe

- Electrical generating units re-powering or closure
- Advanced Clean Cars / Clean Trucks
- Addtl. already-adopted strategies to be quantified

FORMATION OF SUB-WORK GROUPS

RAQC committed to support up to three sub-work group areas in the first half of 2025. Our staff recommendation led to the following three subgroups:

1. Warehouses
2. Entertainment & Recreation
3. Airports & Universities

Stakeholder input/feedback on this recommendation was collected until January 10th.

How were these proposed areas selected?

The RAQC's goal is to home in on evaluating and developing next steps on indirect sources where:

- We believe we can guide the development of programs and/or regulations that produce effective reductions in the near- to medium-term
 - Incorporating environmental justice considerations
- Sources have high trip generation, number of vehicle miles traveled, and/or are associated with high emitting vehicles
 - Existent data or estimations of square footage, emissions, total trips, and/or total mileage
 - Measurable, notable economic activity
- Of interest to stakeholders, based on discussions of the full work group



NEXT WORK GROUP MEETING

[Indirect Sources Technical Sub-Work Groups Meeting – February 25th](#) (register at link)

Meetings are virtual, all are welcome to participate in one or more work group

1. Warehouses: 9-10am
2. Entertainment & Recreation: 10-11am
3. Airports & Universities: 11am-12pm

Which work group(s) would you like to participate in?

- RAQC staff are collecting comments on draft charge statements for each group, including further defining the area of focus, topics for exploration and discussion, and relevant stakeholders
- RAQC staff will be sharing additional documentation to support sub-Work Groups
- Subgroups will meet monthly on 4th Tuesdays, 9am-12pm, going forward



MOST RECENT MEETINGS – REFERENCE INFO

[January 14, 2025 ISER full Workgroup meeting](#)

Indirect Source Authority Memo, updated Jan. 2025

[View](#)

RAQC Indirect Sources Work Group Intro and Timeline Presentation, January 2025

[View](#)

Indirect Source Data Analysis Considerations Presentation, January 2025

[View](#)

[Indirect Sources Technical Sub-Work Groups Meetings – January 28, 2025](#)

Draft Charge Statement: Indirect Sources Warehouses Sub-Work Group

[View](#)

Draft Charge Statement: Indirect Sources Entertainment & Recreation Sub-Work Group

[View](#)

Draft Charge Statement: Indirect Sources Airports & Universities Sub-Work Group

[View](#)



OPEN DISCUSSION

- Questions about ISER effort?
 - Encourage involvement from local and state transportation/transit agencies
- Suggestions for future speakers and stakeholder engagement
- Other relevant topics
- Reach out to emissioncontrols@raqc.org or speak with RAQC staff today if you would like to be added to the ISER Work Group mailing list

Thank you!