

CDPHE and CACI Discuss “Modeling” and Cost-Benefit Analysis of Rules and Regulations

December 16--Two CACI working groups today met with [Colorado Department of Public Health and Environment](#) (CDPHE) staff, to discuss two issues: “modeling” and cost-benefit analysis of rules and regulations. Members of the CACI Energy and Environmental Council comprise the two working groups.

<http://www.cdphe.state.co.us/>

“Modeling” is the process of using mathematical and numerical techniques to assess the projected impact of a project or site on air quality. Modeling must show certain results in terms of impact, depending on whatever requirements are particular to the region or type of permit being applied for, in order for a permit to be issued by the CDPHE’s [Air Quality Control Division](#).

<http://www.cdphe.state.co.us/ap/airpermits.html>

The impetus behind the creation of the working groups was a September meeting of the CACI Energy and Environment Council during which CDPHE staff presented a draft of the CDPHE strategic plan. At that time, the CDPHE staff said that they would like to work specifically with CACI members to address two issues: (a) a way to improve the modeling process and (b) the need for cost-benefit analysis regarding rules and regulations.

At the meeting last Friday, Martha Rudolph, CDPHE’s Director of Environmental Programs; Karin McGowan Community Relations Director; and Will Allison, Air Pollution Control Division Director, represented CDPHE.

CACI members discussed current concerns, focusing on the fact that there is more than one way to be right in modeling, which is the cause of much of the delays in issuing air quality permits by the Air Quality Control Commission. Several suggestions were made about how to move forward when there are multiple ways to do the modeling that are consistent with U.S. Environmental Protection Agency (EPA) guidance but when CDPHE and the permitted source have different preferences.

The CACI modeling work group will meet again in 2012 to discuss recurring themes, the top snags that bog down the process. CDPHE has expressed a desire to continue meeting with the CACI modeling work group to explore issues that come up often and are hopeful that in a general discussion rather than in reference to a specific permit, participants will be able to be more candid than they can be in an application process. Additionally, the group will consider options from other states and will revisit a previous stakeholder process on the topic. Stay tuned for more information on the working group.

The working group on cost-benefit analysis met as well. CDPHE described the statute that governs the [Air Pollution Control Division](#) and requested feedback on what the situations are in

which cost-benefit analysis is valuable. The group discussed the work being done on the topic in the legislature and through the Governor's Office. CACI will be requesting feedback from CACI Energy and Environment Council members on areas where cost-benefit analysis would be most helpful in CDPHE activities and will continue to follow the broader efforts on the topic as well.

<http://www.cdphe.state.co.us/ap/index.html>

For more information on these issues and the CACI working groups, contact [Carly Dollar](#), CACI Governmental Affairs Representative, at 303.866.9622.

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