



## MEMORANDUM

**To: NFRMPO Technical Advisory Committee**

**From: Mykayla Marek**

**Date: January 15, 2025**

**Re: Action - 2021-2025 NFRMPO Targets for Safety Performance Measures**

### Objective

TAC recommend the adoption of regional Safety Performance Measure Targets for 2021-2025 to Planning Council.

### Summary

Per federal requirements, the NFRMPO must set Targets for five Safety Performance Measures for the 2021-2025 period by February 28, 2025. CDOT set statewide Targets for 2021-2025 in August 2024.

To set Targets, the NFRMPO can either:

- A. Support the CDOT statewide Safety Targets and agree to plan and program projects to contribute toward accomplishment of the state Safety Targets, or
- B. Set Targets specific to the NFRMPO region.

The statewide Targets set by CDOT for the 2021-2025 period include:

- Number of Fatalities – **740**
- Rate of Fatalities per 100M Vehicle Miles Traveled (VMT) – **1.363**
- Number of Serious Injuries – **3,640**
- Rate of Serious Injuries per 100M VMT – **6.701**
- Number of Non-motorized Fatalities and Serious injuries – **659**

The NFRMPO used the same methodology CDOT used to set the 2021-2025 Safety Targets to present the status of safety in the NFRMPO and potentially set regional Targets for the 2021-2025 period rather than support the statewide Targets. The state Target option and the regional Target option is presented in **Table 1**.

### Analysis

Requirements and Considerations:

- Targets for the Highway Safety Performance Measures are set based on a rolling 5-year average.
- CDOT analyzed 10 years of historic crash data and used an exponential smoothing (ETS) analysis to forecast fatalities and serious injuries for 2024 and 2025. The 5-year average was calculated using actual fatality and serious injury numbers for 2021-2023 and the



forecasted numbers for 2024-2025. NFRMPO Staff duplicated this methodology using crash data for the region.

- There is no financial penalty to the NFRMPO for not achieving or making significant progress toward Targets. The NFRMPO could be penalized administratively via Certification Reviews for not meeting Targets.
- The NFRMPO and CDOT must set Targets for the five Safety Performance Measures annually.
- The NFRMPO's Targets for 2021-2025 will be included in future updates to the NFRMPO's Transportation Improvement Program (TIP) and Regional Transportation Plan (RTP).
- The CDOT Targets for the National Performance Measures are not aspirational Targets, such as those established in the *2020-2021 Strategic Transportation Safety Plan* or outlined in the NFRMPO Safety Vision adopted by Planning Council in September 2020. While CDOT and the NFRMPO are still endeavoring to move toward zero deaths and injuries, the federally required Targets are data driven in accordance with the FHWA requirements for Target setting.
- The NFRMPO has set Safety Performance Measure Targets by supporting CDOT's Targets from 2018-2023. All statewide Targets are presented in **Table 2**. In 2024, the NFRMPO set its own regional Targets instead of supporting the statewide Targets. The 2024 regional Target and 2025 regional Target option are presented in **Table 3**.

#### Advantages:

- Setting regionally specific Targets provides a more accurate reflection of safety in the North Front Range.

#### Disadvantages:

- The NFRMPO does not have set funding for safety specific projects which would directly contribute to crash reductions.

### Recommendation

NFRMPO Staff requests that TAC members recommend the regional Safety Performance Measure Targets option for 2021-2025 to Planning Council.

### Attachments

- **Table 1:** 2021-2025 Safety Performance Measure Target Options
- **Table 2:** Historical CDOT Safety Performance Measure Targets
- **Table 3:** Historical NFRMPO Safety Performance Measure Targets



**Table 1: 2021-2025 Safety Performance Measure Target Options**

Measure	2021-2025 CDOT Statewide Target Option	2021-2025 NFRMPO Regional Target Option
Fatalities	740	36
Fatality Rate Per 100M VMT	1.363	0.943
Serious Injuries	3,640	298
Serious Injury Rate Per 100M VMT	6.701	7.671
Non-Motorized Fatalities and Serious Injuries	659	41

**Table 2 :Historical CDOT Safety Performance Measure Targets**

Measure	2014-2018	2015-2019	2016-2020	2017-2021	2018-2022	2019-2023	2020-2024	2021-2025
Fatalities	610	644	618	603	597	668	716	740
Fatality Rate Per 100M VMT	1.2	1.21	1.143	1.113	1.093	1.262	1.358	1.363
Serious Injuries	3,350	2,909	3,271	3,161	3,194	3,041	3,507	3,640
Serious Injury Rate Per 100M VMT	6.79	5.575	6.075	5.828	5.846	5.794	6.528	6.701
Non-Motorized Fatalities and Serious Injuries	586	514	670	551	571	548	572	659

**Table 3: Historical NFRMPO Safety Performance Measure Targets**

Measure	2020-2024	2021-2025 Option
Fatalities	39	36
Fatality Rate Per 100M VMT	1.11	0.943
Serious Injuries	238	298
Serious Injury Rate Per 100M VMT	6.73	7.671
Non-Motorized Fatalities and Serious Injuries	36	41



## MEMORANDUM

**To:** NFRMPO Technical Advisory Committee

**From:** Mark Northrop

**Date:** January 15, 2025

**Re:** Action – MMOF Call for Projects

### Objective

To recommend Planning Council approval of the 2024 MMOF Call for Projects funding recommendations.

### Summary

The 2024 Multimodal Transportation and Mitigation Options Fund (MMOF) Call for Projects was open from October 4 through November 15, 2024. The NFRMPO received applications for 14 projects from 9 local agencies. The Scoring Committee for the MMOF program, consisting of voting members of NFRMPO Member communities, was held on December 13, 2024.

The scoring committee recommended fully funding 4 requests and partially funding one request. All award recommendations from the scoring committee is presented in **Attachment 1**. Projects above the red line are being recommended for funding.

The Planning Council discussed the Scoring Committee recommendations at their meeting on January 9, 2025.

### Recommendation

Staff requests TAC recommend Planning Council approval of the 2024 MMOF Call for Projects funding recommendations.

### Attachments

**Attachment 1:** Award Recommendations

**Attachment 2:** Presentation (Handouts)



**Attachment 1:** Award Recommendations

<b>Multimodal Transportation and Mitigation Options Fund (MMOF): Category A</b>				
<b>Rank</b>	<b>Score</b>	<b>Project Name</b>	<b>Funding Request</b>	<b>Scoring Committee Recommendation</b>
1	85.63	US 34 Transit Sidewalk Connectivity Project	\$1,388,297	\$1,388,297
2	82.94	Foothills Transit Station and Roundabout	\$539,547	\$317,669
3	82.75	Taft Hill Road Corridor Project	\$1,700,000	\$1,700,000
4	80.06	Connecting North College	\$313,437	
5	73.63	Battery Electric Bus Purchase	\$850,000	
6	67.00	Windsor Sidewalk Improvements at Railroad Crossings	\$815,580	
7	64.69	Great Western Trail Paving	\$658,000	
8	58.25	Roundabout WCR13 and Roosevelt Pkwy	\$116,819	
<b>Multimodal Transportation and Mitigation Options Fund (MMOF): Category B</b>				
<b>Rank</b>	<b>Score</b>	<b>Project Name</b>	<b>Funding Request</b>	<b>Scoring Committee Recommendation</b>
1	83.00	FRPR Fort Collins and Loveland Station	\$567,661	\$567,661
2	82.88	Weld County On-demand Transit Program	\$567,661	\$567,661
3	76.50	10th Street Transit Vision	\$450,000	
4	72.13	Greeley Active Modes Plan	\$150,000	
5	71.63	Highway 34 Bypass Trail West	\$465,000	
6	70.33	Collins St. (WCR74) Corridor Design	\$275,000	



# 2024 MMOF Call for Projects

Technical Advisory Committee (TAC)



North Front Range  
Metropolitan  
Planning  
Organization

January 15, 2025

## 2024 MMOF Call for Projects: Action



North Front Range  
Metropolitan  
Planning  
Organization



**Program Overview**



**Project Recommendations**



**TAC Recommendation**

## MMOF Goals



- **Benefits seniors** by making aging in place more feasible;
- Benefits residents of communities, in **rural and disproportionately impacted communities**, by providing them with **more accessible and flexible public transportation services**;
- Provides **enhanced mobility for persons with disabilities**;
- Provides **safe routes to school for children**; and
- Increases access to and/or usage of **transit or multi-use facilities**.\*
- **Reduces emissions** of air pollutants, including hazardous air pollutants and greenhouse gases, that contribute to adverse environmental effects, including but not limited to climate change, and adverse human health effects

\*Goal added by NFRMPO in the 2019 MMOF Call for Projects.

3

## 2024 MMOF Call: FY2024-2028 Funding Estimates



Fiscal Year	Category A (75%)	Category B (25%)	Total Available
2024	\$287,841	\$95,947	<b>\$383,788</b>
2025	\$116,819	\$38,940	<b>\$155,759</b>
2026	\$863,605	\$287,868	<b>\$1,151,473</b>
2027	\$1,041,223	\$347,074	<b>\$1,388,297</b>
2028	\$1,096,478	\$365,493	<b>\$1,461,971</b>
<b>Total</b>	<b>\$3,405,966</b>	<b>\$1,135,322</b>	<b>\$4,541,288</b>

4

## 2024 MMOF Call: Funding Goals Per Category



	Project Types		Total
	Category A	Category B	
	Quantifiable GHG Reducing Projects	Non-Quantifiable or Non-GHG Reducing Projects	
<b>Funding Available</b>	\$3,405,966	\$1,135,322	\$4,541,288
<b>Maximum Award per Sponsor</b>	<b>\$1,702,983</b>	<b>\$567,661</b>	<b>\$2,270,644</b>

5

## 2024 MMOF Call: Schedule

Activity	Date
Planning Council Action on MMOF Call Process	October 3, 2024
<b>Call for Projects Opens</b>	<b>October 4, 2024</b>
MMOF Applicant Workshop	October 7, 2024
<b>Project Descriptions Due to NFRMPO</b>	<b>October 11, 2024</b>
NFRMPO feedback on Project Descriptions	October 18, 2024
<b>Draft Project Applications due to NFRMPO - CDOT Review</b>	<b>October 25, 2024</b>
NFRMPO GHG Emissions Reduction Results Discussion	Week of November 4
CDOT feedback on Draft Applications	~November 8
<b>Call for Projects Closes - Applications Due to NFRMPO (6 weeks open)</b>	<b>November 15, 2024</b>
NFRMPO sends out scoring materials	November 18, 2024
Questions about applications to be sent to NFRMPO to be distributed to project sponsors	November 22, 2024
Scoring worksheets due to NFRMPO	Week of December 2
<b>Scoring Meeting</b>	<b>Week of December 9</b>
TAC Discussion of Recommended Projects – Staff Presentation	December 18, 2024
Council Discussion of Recommended Projects – Applicant Presentations	January 9, 2025
TAC Recommendation on MMOF Awards	January 15, 2025
Council Action on MMOF Awards	February 6, 2025

6





2024 MMOF Call:  
Project Recommendations



North Front Range  
Metropolitan  
Planning  
Organization

2024 MMOF Call:  
Category A: Recommendations

Multimodal Transportation and Mitigation Options Fund (MMOF): Category A

Rank	Project ID	Project Name	MMOF Request	Scoring Committee Recommendation
1	MMOF-11	US 34 Transit Sidewalk Connectivity Project	\$1,388,297	\$1,388,297
2	MMOF-03	Foothills Transit Station and Roundabout	\$539,547	\$317,669
3	MMOF-10	Taft Hill Road Corridor Project	\$1,700,000	\$1,700,000
4	MMOF-04	Connecting North College	\$313,437	
5	MMOF-02	Battery Electric Bus Purchase	\$850,000	
6	MMOF-14	Windsor Sidewalk Improvements at Railroad Crossings	\$815,580	
7	MMOF-12	Great Western Trail Paving	\$658,000	
8	MMOF-09	Roundabout WCR13 and Roosevelt Pkwy	\$116,819	
			<b>Total</b>	<b>\$3,405,966</b>

Multimodal Transportation and Mitigation Options Fund (MMOF): Category B				
Rank	Score	Project Name	Funding Request	Scoring Committee Recommendation
1	MMOF-05	FRPR Fort Collins and Loveland Station	\$567,661	\$567,661
2	MMOF-13	Weld County On-demand Transit Program	\$567,661	\$567,661
3	MMOF-06	10th Street Transit Vision	\$450,000	
4	MMOF-07	Greeley Active Modes Plan	\$150,000	
5	MMOF-08	Highway 34 Bypass Trail West	\$465,000	
6	MMOF-01	Collins St. (WCR74) Corridor Design	\$275,000	
			<b>Total</b>	<b>\$1,135,322</b>

2024 MMOF Call: Questions?



**Mark Northrop**  
 Transportation Planner II  
 (970) 289-8279  
[mnorthrop@nfrmpo.org](mailto:mnorthrop@nfrmpo.org)

**MMOF Inquiries**  
[planning@nfrmpo.org](mailto:planning@nfrmpo.org)

**Table 1. FY2026-2029 TIP Projects**

<b>Project Name</b>	<b>Sponsor</b>	<b>Funding Program</b>	<b>Awarded Funds (in thousands)</b>
<b>Greeley 2024 SS4A</b>	Greeley	SS4A	<b>\$9,947</b>
<b>Fort Collins 2023 SS4A</b>	Fort Collins	SS4A	<b>\$10,041</b>
<b>Fort Collins 2024 SS4A</b>	Fort Collins	SS4A	<b>\$2,180</b>
<b>Loveland SS4A</b>	Loveland	SS4A	<b>\$396 (Federal)</b>
<b>Greeley Bus Grant</b>	Greeley	FTA 5339	<b>\$4,128</b>
<b>WCR 66 Corridor</b>	Weld County	-	<b>\$77,511</b>

# Northern Colorado Bike & Ped Collaborative

Executive Summary – Wednesday, January 8, 2025

## A Tale of Two Counties: Transregional Planning and the Poudre River Trail (PRT)

George Moncaster, CSU, gave an overview of the PRT history project. The project is a written history of the Poudre River Trail. Research began in November 2023 and included a variety of sources, including municipal documents, CDOT and MPO records, and archival newspaper collections. Moncaster noted trail construction began in Larimer and Weld counties at different times. Larimer County communities began building sections of the trail as early as the mid-1970s, and Weld County communities began construction slightly later and utilized different funding sources.

## NoCo Values and Operating Principles Adoption

Rouser gave an overview of the proposed changes to the NoCo Bike & Ped Values and Operating Principles. Major changes include changing the voting structure and updating the groups' decision-making process. Rouser noted voting members will get at least two weeks' notice before a vote. The group will still operate through consensus and will try to avoid holding a vote unless consensus cannot be achieved. The group agreed to adopt the proposed changes.

## Wayfinding Discussion

Rouser noted one of the group's goals in 2025 is to work towards improving wayfinding in the region. The group discussed the *2021 Regional Active Transportation Plan's* (ATP) wayfinding guidance. The group discussed local wayfinding signage and continuing to use the City of Fort Collins' wayfinding signs as a template for future signage. The group discussed the different ways in which each community translates their signs and expressed interest in discussing sign translation further at future meetings.

## Active Transportation Data

Rouser noted the NFRMPO may be purchasing additional bike/ped counters for the mobile counter program. Rouser stated NFRMPO staff will continue to think of ways to improve active transportation data sharing between the NFRMPO and local communities.

EXECUTIVE SUMMARY of the  
North Front Range Transportation and Air Quality Planning Council  
January 9, 2025

Move to Approve Agenda and Minutes

Stephens **moved** to APPROVE THE DECEMBER 5, 2024 MEETING MINUTES. The motion was **seconded** by James and **passed** unanimously.

AIR QUALITY AGENDA

*NFRMPO Air Quality Program Updates* – Wojtach explained that the EPA set a new, lower PM2.5 National Ambient Air Quality Standard (NAAQS) in early 2024 of 9 µg/m<sup>3</sup>. She stated that this set into motion a process to determine which areas are or are not meeting this standard. She explained that as a result of this process, it was found that the three-year averages for PM2.5 monitoring sites are below the 9 µg/m<sup>3</sup> standard. Therefore, the APCD is recommending that the AQCC support its recommendation to the EPA that all areas within the state meet the new, lower standard. The public hearing for this will take place in January 2025. She then explained that at the December 18 RAQC Control Strategy meeting, they discussed potential control strategies for mobile source emission caps and are considering setting future emission targets for mobile source emissions. She stated that the RAQC will have more information on this over the next few months as they have more detailed conversations about this potential strategy.

*Regional Air Quality Council (RAQC)* – Stephens stated that there have been 2 RAQC meetings since the last NFRMPO Planning Council meeting, and they have been discussing potential control strategies for reducing ozone.

*Nonattainment Area Air Pollution Mitigation Enterprise (NAAPME)* – Stephens discussed the new Community Clean Transportation Assistance Grant Funding Program (CCTAP), which is now accepting applications. The program has approximately \$17M available, with a minimum request of \$500,000. Draft applications are due at the end of February.

METROPOLITAN PLANNING ORGANIZATION (MPO) AGENDA

REPORTS:

*Report of the Chair*- Chair Olson requested a volunteer for the vacancy on the NFRMPO's Finance Committee. He explained Stephens stepped into the Vice Chair position which created this vacancy. Mallo then nominated himself to serve on the Finance Committee.

*Executive Director Report* – Sizemore discussed the Greeley MERGE project, which went to the Transportation Commission in December. He let the Council know the UPWP Amendment was approved by FHWA. He explained that in September, he cosigned a letter to the EPA explaining concerns for ozone in the Intermountain West region. A response was received from the EPA, which acknowledged the concerns and discussed a study they are currently conducting related to the concerns. He announced that the new Transportation Commissioner for District 5 is Cecil Gutierrez.

CONSENT AGENDA:

Canonico **moved** to approve the consent agenda. The motion was **seconded** by James and **passed** unanimously.

ACTION ITEMS:

*Off-Cycle December 2024 TIP Amendment*

Stockburger described that the Off-Cycle December 2024 TIP Amendment includes the addition of a CDOT Region 4 new project titled US 287 Median Safety Berthoud South. He stated the funding amounts and sources

for the project for FY25-27. He explained the purpose of the project and that approximately 3 miles of the project is located within the NFRMPO region. He stated that the 30-day public comment period opened on December 11 and will close on January 10, and the approval of this amendment is contingent on there being no comments by the end of the public comment period. Karspeck **moved** to approve the Off-Cycle December 2024 TIP Amendment. The motion was **seconded** by James and **passed** unanimously.

#### DISCUSSION ITEMS:

*2021-2025 NFRMPO Targets for Safety Performance Measures* – Marek discussed the 2021-2025 NFRMPO Targets for Safety Performance Measures. She explained the federal requirements for the targets and that the NFRMPO can either support the state’s targets or set regional targets. She noted the NFRMPO’s history of supporting the state’s targets until 2024, which is when the NFRMPO adopted regionally specific targets. She presented the state targets option and the NFRMPO regional targets option as well as the methodologies used to create these targets. She explained that CDOT’s targets have increased in all areas, and the NFRMPO’s targets have seen a decrease in fatalities and the fatality rate but increases in the other categories.

*NFRMPO 10-Year Priority List* – Karasko provided an update on the agenda and logistics for the upcoming January 30<sup>th</sup> 10-Year Priority List Workshop.

*2024 MMOF Call for Projects* – Northrop provided an update on the 2024 MMOF Call for Projects Scoring Committee’s funding recommendations. He provided a brief overview of the MMOF program goals and funding amounts available in FY24-28 funds. He explained that for Category A, the Scoring Committee is recommending the US34 Transit Sidewalk Connectivity Project, the Taft Hill Road Corridor Project, and the Foothills Transit Station and Roundabout Project be funded. For Category B, the Scoring Committee is recommending the FRPR Fort Collins and Loveland Station Project and the Weld County On-Demand Transit Program Project be funded. Project sponsors then gave a brief presentation of their project.

#### EXECUTIVE SESSION:

Planning Council went into Executive Session to discuss the performance of the Executive Director.

Subject: Air Quality Related Activities Report to NFRMPO Council

Date: 12/30/24

---

**Introduction:**

Two Roads Environmental LLC (TRE) is providing a monthly report of air quality related activities to the North Front Range Metropolitan Planning Organization (NFRMPO) Council for their January 2, 2025 Meeting.

**Summary:**

In December, TRE tracking activities at the Regional Air Quality Council (RAQC), Air Quality Control Commission (AQCC), as well as federal activities. Highlights include the APCD's proposed recommendation to EPA regarding areas meeting the new 2024 lower PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS), the AQCC's adoption of revised Procedural Rules and a new oil and gas related rule specific to industrial fossil-fuel combustion emissions and trading, and the RAQC's efforts to identify emissions control strategies for the upcoming Serious Ozone State Implementation Plan (SIP).

**Air Quality Activities:**

AQCC Activities:

The AQCC agreed to hold a public hearing at their upcoming January 2025 meeting on Colorado's status in meeting EPA's January 2024 revised 9 µg/m<sup>3</sup> PM<sub>2.5</sub> NAAQS.<sup>1</sup> The APCD shared information from PM<sub>2.5</sub> monitoring sites operated in Colorado, focusing on those operated for at least three years under EPA approved monitoring plan. This data demonstrates that three-year averages from the most recent full three years (2021-2023) are below the 9 µg/m<sup>3</sup> standard. As a result, the APCD is recommending that the AQCC support its recommendation to EPA that all areas within the state be designated as attainment or attain/unclassifiable.

The APCD's Technical Support Document's Figure 2 illustrates the three-year averages in reference to the 9 µg/m<sup>3</sup> standard and Table 2 illustrates three-year average values per monitor.<sup>2,3</sup>

---

<sup>1</sup> EPA's 2024 PM<sub>2.5</sub> National Ambient Air Quality Standard of 9 µg/m<sup>3</sup> is the three-year average of the maximum 24 hour

<sup>2</sup> State of Colorado. "Technical Support Document, 2024 Primary Annual PM<sub>2.5</sub> Standard Designation Recommendations," DRAFT – December 3, 2024. p. 4. Downloaded December 28, 2024 from the Air Quality Control Commission's January 16-17 meeting materials associated with the Request for Hearing, here: <https://cdphe.colorado.gov/aqcc>

<sup>3</sup> Ibid, p. 6.

Figure 2. Colorado Annual PM<sub>2.5</sub> Ambient Air Concentration Trends

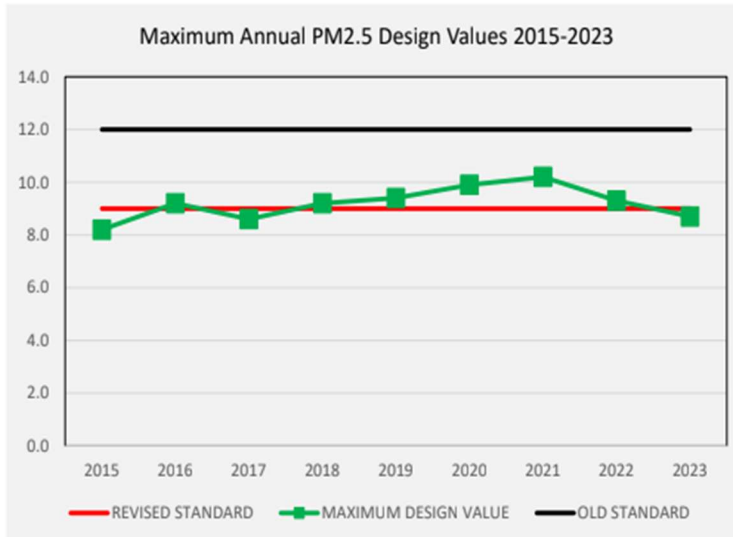


Table 2. AQ<sub>S</sub> Monitoring Site Design Value Summary 2015-2023

County Name	Local Site Name	2013-2015 (µg/m <sup>3</sup> )	2014-2016 (µg/m <sup>3</sup> )	2015-2017 (µg/m <sup>3</sup> )	2016-2018 (µg/m <sup>3</sup> )	2017-2019 (µg/m <sup>3</sup> )	2018-2020 (µg/m <sup>3</sup> )	2019-2021 (µg/m <sup>3</sup> )	2020-2022 (µg/m <sup>3</sup> )	2021-2023 (µg/m <sup>3</sup> )
Adams	Birch Street									8.5
Arapahoe	Arapahoe Community College	6.3	5.9	5.9	6.0	6.1	6.1	6.4	6.1	5.9
Boulder	Longmont - Municipal Building	7.0	6.9	6.7	6.9	6.9	7.6	8.4	8.1	7.3
Boulder	Boulder Chamber Of Commerce	5.9	5.6	5.5	5.8	6.0	6.2	6.5	6.1	5.5
Denver	Denver - National Jewish Health							7.7	7.5	6.9
Denver	La Casa	7.5	7.2	7.0	7.1	7.2	7.3	7.5	7.2	6.6
Denver	I-25		9.2	8.6	8.0	8.1	8.3	8.5	7.6	7.4
Denver	Globeville				9.2	9.4	9.9	10.2	9.3	8.7
Douglas	Chatfield State Park	5.5	5.2	5.3	5.7	5.8	5.9	6.1	5.8	5.5
El Paso	Colorado Springs - College	5.7	5.6	5.7	6.0	5.7	5.7	5.6	5.5	5.3
Larimer	Fort Collins - CSU - Edison	6.8	6.8	7.1	7.3	7.0	7.2	7.5	7.7	7.1
Mesa	Grand Junction - Powell Building	7.4	6.6	6.1	5.9	5.5	5.7	5.8	5.8	5.3
Rio Blanco	Rangely Golf Course	8.2	7.8	7.8	7.9	8.0	8.3	8.6	8.5	7.2
Weld	Greeley - Hospital	7.3			9.1	9.1	9.5	9.5	8.8	8.1

Those PM<sub>2.5</sub> monitors with highest annual averages (or Design Values) are the Globeville, Greeley Hospital and I-25 monitoring stations located in Denver and Weld Counties.

Notably the Technical Support Document makes no mention of wildfire influence or other natural events, thus it is assumed that the data presented includes all monitored data regardless of wildfire influence over time. Further, the Technical Support Document attributes recent reductions in PM<sub>2.5</sub> levels to emission reductions from mobile sources, regulated industry and





residential activities anticipating that “regulatory and statutory requirements for Ozone, Regional Haze, and Greenhouse Gases applicable in Colorado” will help maintain PM<sub>2.5</sub> levels into the future.<sup>4</sup>

In December, the AQCC took final action adopting revisions to their Procedural Rules that take effect for all rulemaking proceedings initiated before August 1, 2025. Generally, these revisions extend the rulemaking process and timeline, affording more time early in the process for stakeholder engagement, including engagement of disproportionately impacted communities. Any entity intending to engage in a rulemaking process may engage informally, by providing input and public comments early in the process (during the Pre-petition and Pre-hearing Phases), and formally, filing for party status during the Pre-hearing Phase. The AQCC will transition to implementing these new rules in 2025, and recognized that the Serious Ozone SIP pre-rulemaking efforts began prior to these revisions taking effect.

The AQCC also adopted new regulations specific to the midstream segment of the oil and gas sector, seeking to reduce emissions from this segment by encouraging the electrification of facilities but also allowing for emissions banking/trading to promote cost effective emissions reductions. The APCD estimated this rule would achieve between \$23.9-59.3 million/yr, achieve 1.031 million metric tons CO<sub>2</sub>e/yr by 2050, and avoid a cumulative \$1.37 billion in 2050 of avoided costs associated with climate change.<sup>5</sup> Additional co-benefits of reductions in ozone pre-cursor pollutants are also anticipated with this rule implementation. While costly, the AQCC adopted this rule in response to the 2021 Colorado Environmental Justice Act mandating a 20% reduction in GHG emissions by 2030 from the manufacturing and industrial sector.<sup>6</sup>

Further, the AQCC adopted revisions to previous Ozone SIP submittals, related to Reasonably Available Control Technology (RACT) requirements to satisfy EPA concerns, and Contingency Measure requirements to address a formal 2023 EPA disapproval of Colorado’s previously submitted contingency measures.

#### RAQC Activities

The RAQC Board met on 12/6/24, largely discussing administrative topics, including a new Legislative Engagement Policy. Staff identified a slate of ozone control strategies currently under analysis or being developed for consideration as part of the Serious Ozone SIP revision in 2025 or a future SIP effort. Landscape equipment (or lawn & garden equipment), consumer products and oil and gas (venting & blowdowns, and pneumatic controllers) were highlighted as for near-term actions. Staff continue to explore establishing mobile source emission targets and/or indirect source rules (ISR) as control strategies. Notably, the APCD indicated taking a different approach to RAQC’s oil and gas control strategies forwarded in 2024 to the APCD.

During the 12/3/24 ISR Work Group Meeting, staff recommended near-term focus on indirect sources associated with warehouses, entertainment and recreation, and airports and universities. Note that the awaited Phase 2 Report data was not presented, so the impact of focusing on these subcategories is unknown. Additionally, NFRMPO and DRCOG staff

---

<sup>4</sup> Ibid, p. 4.

<sup>5</sup> See APCD’s “Regulatory Analysis;” 12/6/24. p. 2. Downloaded 12/30/24, here: <https://drive.google.com/drive/u/1/folders/1U5VWj3VNVhAcl2bDZKAve51P7vKj6NV0>

<sup>6</sup> See 25-7-105(1)(e)(XIII), C.R.S.



presented different methods and models used by those organizations in projecting future growth, related transportation demand and thus emission estimates from on-road/mobile sources. RAQC staff shared a memo outlining Colorado’s legal authority to regulate indirect sources, seeming to take the position that no further legal authority was needed to regulate indirect sources in Colorado. Staff was requested to further explain the difference between federal and Colorado statute definitions of “indirect sources,” and were questioned on the reasoning behind earlier recommendations to the Transportation Legislative Review Committee to strengthening legislative authority in order to regulate indirect sources. Notably, APCD and AGO staff did not weigh in on the legality of regulating these sources in Colorado.

During the 12/18/24 Control Strategy Committee Meeting, a potential future mobile source emissions cap was discussed conceptually, which could be part of an indirect source rule. This future cap could potentially be broken down per non-road and on-road categories. When questioned about how this strategy could translate into a rule, staff suggested that the AQCC could incorporate the caps into their GHG Resolution in the future to establish benchmarks and reporting requirements, and potentially future regulations if adequate progress is not made.

Additionally, staff discussed landscape maintenance equipment and the potential to expand current rules by adopting elements of the RAQC’s 2023 rule alternative that were not adopted by the AQCC in 2023. Elements not adopted by the AQCC include an equipment sales ban, applying the in-use limitations beyond public entities to also include homeowner’s associations, private golf courses and commercial landscaping companies. The RAQC will update estimated emissions benefits associated with these strategies upon receiving updated data platforms in the coming months.

Other Air Quality Initiatives:

EPA announced the tentative selection of the state of Colorado as a recipient of EPA’s Clean Heavy-Duty Vehicles Grant Program to receive \$735,000 to fund replacement of three straight/box trucks and utility vehicles.<sup>7</sup>

EPA action on Contingency Measures – On 12/3/24, EPA finalized guidance on meeting State Implementation Plan (SIP) Contingency Measures requirements.<sup>8</sup> Note that the Denver Metropolitan North Front Range Ozone Nonattainment (DMNFR) Area is subject to adopting contingency measures into the Ozone SIP, establishing control requirements that take effect if the area does not meet a prescribed milestone (i.e. attain the NAAQS by the attainment date or meet Reasonable Further Progress milestones). In this guidance, EPA recommends changes in methodology determining the amount of reductions needed to satisfy this SIP element, recommends an infeasibility justification that may be used if the amount of reductions cannot be satisfied, and recommends changes to the time period in which the contingency measures take

---

<sup>7</sup> See EPA’s “Clean Heavy-Duty Vehicles Grant Program” webpage, at: <https://www.epa.gov/clean-heavy-duty-vehicles-program>, selecting “Tentatively Selected Applications & Project Information” under “Resources.”

<sup>8</sup> See EPA Guidance from Joseph Goffmann to Regional Air Division Directors, Regions 1-10. “Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter,” 12/3/24. Downloaded 12/28/24 from: [https://www.epa.gov/system/files/documents/2024-12/cmtf-final-guidance-signature-version-11-22-24\\_clean\\_0.pdf](https://www.epa.gov/system/files/documents/2024-12/cmtf-final-guidance-signature-version-11-22-24_clean_0.pdf)



place. It appears that EPA may apply this guidance in acting upon previously submitted to Contingency Measure SIP elements, including for the DMNFR Area.

On 12/10/24, EPA released a pre-publication version finalizing the NO<sub>x</sub>/SO<sub>2</sub>/PM, establishing multi-pollutant secondary or welfare based standards.<sup>9</sup> Specifically, EPA revises the SO<sub>2</sub> secondary standard from to an annual standard of 10 ppb (on a 3 year average basis) from a 0.5 ppm value not to be exceeded more than once per year (on a 3 hour/year basis), and retains all remaining NO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> secondary standards. Recall that in May 2024, public commentors suggested the need for more stringent standards, including the need to set an ammonia secondary standard, to reduce eco-system impacts in national parks. Specifically, impacts to Rocky Mountain National Park were referenced by commentors.

On 12/13/24, the Mobile Sources Technical Review Subcommittee of EPA's Clean Air Act Advisory Committee received updates from their Locomotives and EV Consumer Information Metrics work groups.<sup>10</sup> Recommendations will be sent to CAAAC to consider, which may in turn influence a future EPA rulemaking on non-road engines, and specific to yard engines or "switcher" locomotive emissions. Many of these engines have exceeded the 10-15 year life expectancy, cannot be easily retrofit with control equipment and do not meet newer emission standards of the newly built Tier 4 emission standards. While states are limited in establishing non-road engine emission standards, states may establish in-use standards (i.e. anti-idling) and/or provide incentives to replace equipment to address these sources of emissions.

#### **Upcoming Activities:**

TRE plans to attend meetings and track air quality related activities as follows, unless otherwise directed.

#### Meetings TRE Plans to Attend (or screen)

- 1/2/25 NFRMPO Council Meeting
- 1/3/25 RAQC Board Meeting
- 1/11/25 APCD Landfill Methane Reduction Stakeholder Meeting
- 1/14/25 RAQC ISR Control Strategy Subcommittee Meeting
- 1/15/25 RAQC Control Strategy Committee Meeting
- 1/16-17/25 AQCC Meeting
- 1/28/25 ISR Subcategory Work Group Meetings

#### Other Anticipated Air Quality Activities

- 1/8/25-5/7/25 Colorado Legislative Session
- EPA's Review of the Ozone NAAQS

---

<sup>9</sup> See EPA's Final rule prepublication, "Review of the Secondary National Ambient Air Quality Standards for Oxides of Nitrogen, Oxides of Sulfur, and Particulate Matter," dated 12/10/24. Downloaded 12/30/24, here: [https://www.epa.gov/system/files/documents/2024-12/5788-2060-as35-noxsoxpm-sec-naaqs-nfr-20241209\\_admin.pdf](https://www.epa.gov/system/files/documents/2024-12/5788-2060-as35-noxsoxpm-sec-naaqs-nfr-20241209_admin.pdf)

<sup>10</sup> See EPA's "Mobile Sources Technical Review Subcommittee Meeting, December 13, 2024" website for details, at: <https://www.epa.gov/caaac/mobile-sources-technical-review-subcommittee-meeting-december-13-2024>