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## August 2025 Report from the Air Pollution Control Division to the North Front Range Transportation and Air Quality Planning Council Thursday, September 4, 2025

### [Air Pollution Control Division](#) (Division) Public Participation Opportunities:

- **Oil and gas methane reduction public meeting:** The division published a new rule concept related to further [reducing methane emissions from oil and gas operations](#). Rulemaking concepts are required under the Air Quality Control Commission's updated procedural rules. The rulemaking concepts include potential revisions to the Air Quality Control Commission Regulation 7. If adopted, the rule would apply to certain "designated facilities" identified in EPA's oil and gas Emission Guidelines and New Source Performance Standards that would reduce methane emissions. The division's preliminary proposal includes new and revised requirements for the following types of oil and gas equipment and activities:
  - Emissions controls, best management practices, and operation and maintenance requirements for transmission and storage segment equipment.
  - Design, operation, and parameter monitoring requirements for enclosed combustion devices.
  - Operational requirements for wet seal compressors, dry seal compressors, and reciprocating compressors.
  - Leak detection and repair requirements for fugitive emissions at well production facilities and natural gas processing plants.
  - Standardized requirements for the use of vapor recovery units for controlling emissions.
  - Standardized requirements for the use of closed vent systems for controlling emissions.
  - Greenhouse gas intensity targets for pre-production and production operations.

View the division's [rulemaking concepts](#) and [initial draft rule revisions](#). During the meeting, the division will provide brief updates regarding required administrative changes through separate rulemakings to update Regulations 6, 8, 28, and the Common Provisions Regulation. Register for the public meeting [Wednesday, Sept. 10, 6-8 p.m.](#)

- **Priority toxic air contaminants permitting needs assessment report:** The air division will discuss a potential air toxics permitting program for Colorado. The division presented a draft conceptual framework at the March and April 2025 outreach meetings. The air division will accept written comments on the draft permitting needs assessment report this fall before submitting it to the Colorado General Assembly by Dec. 31, 2025. These meetings will review the contents of the report, collect verbal comments, and provide instruction on how to provide written public comment. Both meetings will cover the same information. Register to join a virtual meeting on [Saturday, Sept. 20, 10 a.m.-12 p.m.](#) or [Wednesday, Sept. 24, 6-8 p.m.](#)



## [Air Quality Control Commission](#) (Commission) Updates:

### August 20-22, 2025 Commission Meeting

- **Secondary SO<sub>2</sub> Designation:** The Commission set a hearing to consider a designation recommendation for EPA's revised secondary SO<sub>2</sub> National Ambient Air Quality Standard.
- **Edge Environmental, LLC v. Air Pollution Control Division, Case Number 21036A and 2038A-01, Adjudicatory Hearing Matters:** Air Pollution Control Division's Motion for Partial Summary Judgment.
- **Regulation Number 31 - Landfill Methane Regulation:** The Commission will consider establishing a new Regulation Number 31 to address municipal solid waste landfill greenhouse gas control and monitoring requirements.

### September 17-19, 2025 Commission Meeting

- **Regulation Number 7 - Oil & Gas Operations:** The Division will request that the Commission set a hearing to consider revisions addressing oil and gas operations impacted by EPA's Emission Guideline 40 CFR Subpart OOOOc.
- **Regulation Number 28 - Building Benchmarking and Performance Standards:** The Commission will consider revisions to Regulation Number 28 to address technical corrections to the rule, specifically related to agricultural buildings, utility subscription services, and the annual fee deadline.
- **Regulation Number 30 - Toxic Air Contaminants:** The Commission will consider revisions to Regulation Number 30 to address the health based standards for the adopted priority air toxic contaminants, in response to HB 22-1244.



Subject: Air Quality Related Activities Report to NFRMPO Council

Date: 9/1/25

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**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 September 4, 2025 meeting.

**Summary:**

In August 2025, TRE tracked activities at the Air Quality Control Commission (AQCC), Air Pollution Control Division (APCD) and Regional Air Quality Council (RAQC), as well as at EPA, with a focus on air quality and transportation. Most notably, the AQCC's Ozone State Implementation Plan (SIP) Rulemaking Hearing is scheduled for November 2025. This proposal does not include any revision reducing the seven-year exemption for newer vehicles from inspection and maintenance testing to three years. The RAQC put forth a revised Blueprint of additional control strategies that may be developed to secure additional ozone precursor pollutant reductions over the next five to seven years. TRE will continue to track and report back on the progress of this rulemaking hearing, and any ozone related activities.

Also note that there are two funding opportunities available in which the NFRMPO Council may have interest, at the Clean Fleet Enterprise and Colorado Air Quality Enterprise discussed in Other Air Quality Activities section below.

**Air Quality Activities:**

AQCC Activities:

In August, the AQCC held a rulemaking hearing on proposed regulations addressing landfills. Rural, local government operated landfills have expressed concerns over required controls, costs and local governments' ability to implement according to proposed timelines, along with potential unintended consequences of illegal dumping in rural areas. The AQCC continued the rulemaking hearing to their December 2025 meeting.

TRE continues to track activities related to the upcoming November 2025 Ozone State Implementation Plan (SIP) Rulemaking Hearing. Again, the November Ozone SIP Rulemaking Hearing proposal includes regulations and regulation revisions specific to:

**Oil and Gas Operations**

- Expanded best management practices for oil and gas storage tanks;
- Expanded NOx intensity program requirements for oil and gas operations;
- Leak detection and repair requirements for transmission and storage facilities in Northern Weld County;
- Best management practices for disposal of oil and gas waste; and
- Seasonal restrictions on oil and gas separator maintenance (as state-only measures).

**Vehicle Inspection and Maintenance**

- Increased vehicle inspection fees;

- Identification of high emitting vehicles operating in the ozone nonattainment area (as a state-only measure and related to SB25-321, signed into law in May 2025).

#### Other

- VOC content limitation for coatings used in aerospace manufacturing
- NOx control requirements for combustion equipment and engines at specific sources
- 2026 Motor Vehicle Emission Budgets of 4.0 tons/day (VOC) and 3.9 tons/day (NOx)

Additional revisions to existing programs are also proposed, including:

- Emission Reduction Credit Program – banking, trading of emission reductions needed for offsets under the Nonattainment New Source Review Program
- New Source Review Program - minor modifications at existing facilities
- Permitting in Disproportionately Impacted Communities
- References to Environmental Justice Mapping Tools
- Clean Air Act Section 185 Penalty Fee Program
- Removal of federal applicability of pneumatic control regulations
- Removal of requirements for sources that are no longer major sources

NFRMPO Council, at their last Planning Meeting, expressed concerns over a potential revision to Colorado's Vehicle Inspection and Maintenance Program (via AQCC's Regulation 11 – Motor Vehicle Emissions Inspection Program), and specifically a change to the new vehicle testing exemption for new vehicles less than seven years old. This is not part of the APCD proposal at this time. TRE will continue to track any alternatives or related revisions put forth.

The Secretary of State published the Notice of Rulemaking for the Ozone SIP Rulemaking Hearing, identifying key milestones, including:

#### **IMPORTANT DATES AND DEADLINES:**

<b>PROCESS DESCRIPTION</b>	<b>DUE DATE &amp; TIME</b>
Request for Party Status	August 12, 2025 by 5:00 p.m.
Status Conference	August 15, 2025 at 9:00 a.m.
Alternate Proposal Submission Deadline	September 30, 2025 by 5:00 p.m.
Prehearing Statement	September 30, 2025 by 5:00 p.m.
Prehearing Conference	October 9, 2025 at 9:00 a.m.
Rebuttal Statement	October 28, 2025 by 5:00 p.m.
Written Public Comments	November 4, 2025 by 5:00 p.m.

Registration for the November AQCC Monthly Meeting is open and individuals and elected officials can register to provide public comments through the registration process.<sup>1</sup> This process is available to those who have not sought official Party Status to the Ozone SIP Rulemaking

<sup>1</sup> Register for the November 2025 AQCC Monthly Meeting here:

[https://us02web.zoom.us/meeting/register/tZYqduuuqDluG9eFCFPDadPbz9pj2zP\\_sVk4#/registration](https://us02web.zoom.us/meeting/register/tZYqduuuqDluG9eFCFPDadPbz9pj2zP_sVk4#/registration)



Hearing. The public comment session begins 11/19/25 at 4:30, and the hearing is scheduled to run through 11/21/25.

During the September AQCC, the AQCC will continue two previous rulemaking hearings related to their Regulation 28 – Building Benchmarking and Performance Standards and Regulation 30 – Five Priority Air Toxics. Notably, the legislative revisions related to agricultural buildings’ being subject to building energy use reporting, and separately to health-based standards for adopted Priority Air Toxic Contaminants (PTACs).

#### APCD Activities

The APCD will hold a public meeting on 9/10/25 6-8 pm sharing a new rule concept to further reduce methane emissions from oil and gas operations.<sup>2</sup> Additionally, the APCD has scheduled two additional meetings to further discussions on regulating PTACs on 9/20 and 9/24.<sup>3</sup>

#### RAQC Activities

The RAQC held a second Control Strategy Blueprint Workshop in Fort Collins on 8/18/25, providing an 8/18 updated version of the Blueprint document.<sup>4</sup> The updated Blueprint added some details for the list of control strategies found in the July 22, 2025 version, however not all concepts have been fleshed out in this version. More details are needed to understand the scope of each strategy, estimated reductions in precursor pollutants, cost factors and ultimately projected impact on modeled ozone levels in the ozone nonattainment area. Comments on the RAQC’s Blueprint, including the latest version released on August 18, 2025 were requested by August 25, 2025. However, RAQC staff indicated that they would accept comments after that date. NFRMPO staff provided an initial set of comments to the RAQC in a letter dated 8/25/25.

RAQC staff indicated possibly rescheduling the postponed Summer 2025 Ozone Forum for November 2025- where information identifying what is projected to be contributing to ozone levels at each monitor (a.k.a. source apportionment) and possibly how reductions in ozone precursors might impact ozone levels (sensitivity runs). This postponement occurred to allow re-running of the MOVES model that estimates mobile source emissions, for consistency with EPA guidance. Staff have indicated that they don’t anticipate significant differences in the model outputs, which are then used as inputs into the next rounds modeling, and that they do not anticipate significant changes in overall modeling outputs. Specifically, staff indicated that they anticipate that the nonattainment area will still be unable to model attainment with the 70 ppb NAAQS.

TRE notes that RAQC staff referenced using the “Direct Decoupled Method” for ozone modeling. – a more efficient way of evaluating multiple changes individually or in combination, to

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<sup>2</sup> Register for the APCD’s Oil and Gas Methane Reduction Public Meeting, scheduled for 9/10/25, 6-8 pm, here: <https://cdphe.colorado.gov/apcd/reducing-methane-emissions-from-oil-and-gas-operations>

<sup>3</sup> Register for the APCD’s Air Toxics Permitting Needs Assessment Public Meeting, scheduled for 9/20/25, 10 am-12 pm, here: [https://us06web.zoom.us/meeting/register/P42GBWa7RPCCRP\\_s6oJ0Ug#/registration](https://us06web.zoom.us/meeting/register/P42GBWa7RPCCRP_s6oJ0Ug#/registration), OR schedules for 9/24/25, 6-8pm here:

<https://us06web.zoom.us/meeting/register/1xDW4RCsRgGCNxnjOnuGEQ>

<sup>4</sup> See RAQC’s “Control Strategy Blueprint Workshop – August 18, 2025 for the Blueprint itself, include a table of control strategies listed on p. 10-13, and presentations made during that workshop, at:

[https://raqc.egnyte.com/dl/cDFGhcYJT3Cw/RAQC\\_Control\\_Strategy\\_Blueprint\\_Aug\\_18\\_workshop\\_version.pdf](https://raqc.egnyte.com/dl/cDFGhcYJT3Cw/RAQC_Control_Strategy_Blueprint_Aug_18_workshop_version.pdf)





derive the sensitivity of the modeled ozone values to control strategies – that reduces the burden and cost of attainment demonstration modeling.

TRE intends to continue to track the development of this Blueprint and overall process for selection of control strategies to be developed. TRE will also continue to track the rescheduling of the Ozone Forum, along with data that will be presented at that forum.

#### 2025 Ozone Season Monitoring Data:

Ozone concentrations in the nonattainment area ozone monitors for the summer to date have experienced high maximum daily 8-hour averages, including at the Fort Collins West, Fort Collins, Fossil Creek, Greeley Weld County, LaSalle Tower, Mehaffey Park and Timnath monitors in Larimer and Weld Counties. As of 8/25/25, the Fort Collins West, Greeley and Timnath monitors already have 4<sup>th</sup> max daily 8-hour averages of 72, 71 and 73 ppb, respectively, above the 70 ppb standard.<sup>5</sup> Note that the Timnath monitor has not been running for 3 years, and thus the data cannot be averaged over three years as required in comparison to the 70 ppb and 75 ppb standards. Also note that this data does include flagged data that may have been influenced by wildfire smoke.

#### Other Air Quality Activities:

TRE is tracking EPA actions including their proposed repealing of their 2009 Endangerment Finding that provides the foundation for EPA's regulating greenhouse gas emission standards for light-duty, medium-duty and heavy-duty vehicles specifically, and greenhouse gases more broadly.<sup>6</sup> EPA announced public hearings, extending public comment period to October 1 for proposed revisions to existing air quality regulations for oil and natural gas equipment and operations. The public hearing is scheduled for 9/2/25.<sup>7</sup> Further, EPA announced new guidance addressing concerns over diesel vehicle's concerns over loss of speed and power due to control devices' use of diesel exhaust fluid – a system used in older vehicles still in use - to meet federal engine standards.<sup>8</sup>

Colorado's Clean Fleet Enterprise will accept applications September 15-October 24, 2025, from businesses, local governments, non-profits, schools, and other organizations seeking grant funding to buy low-emission or zero-emission vehicles for use in fleet operations.<sup>9</sup> Separately, Colorado's Air Quality Enterprise launched a Rolling (Evergreen) Application process for applicants seeking grant funding to "Advanc[e] Air Quality in Colorado through New

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<sup>5</sup> See RAQC's Current 8-Hour Ozone Summary, "Ozone Summary through August 24th, 2025", downloaded 8/25/25 here: <https://raqc.org/current-8-hour-ozone-summary/>

<sup>6</sup> See EPA's proposed "Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards," August 1, 2025 (90 Fed Reg 36288); downloaded 8/1/25 here: <https://www.govinfo.gov/content/pkg/FR-2025-08-01/pdf/2025-14572.pdf>

<sup>7</sup> See EPA's "2025 Interim Final Rule to Extend Compliance Deadlines" webpage, accessed 9/1/25 here: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-operations/2025-interim-final-rule-extend-compliance>

<sup>8</sup> See EPA's "Revised Guidance for Light Duty Vehicles, Heavy-Duty Diesel Engines and Nonroad Compression-Ignition (CI Engines Using Selective Catalyst Reduction (SCR) Technologies," August 11, 2025. Accessed 9/1/25 here: <https://www.epa.gov/system/files/documents/2025-08/def-ltr-manufacturer-2025-0811.pdf>

<sup>9</sup> See CDPHE's "Clean Fleet Vehicle and Technology program" webpage for details, at: <https://cdphe.colorado.gov/clean-fleet-vehicle-and-technology-program>



and Emerging Technologies,” which is broad and open-ended.<sup>10</sup> Funding is limited, and applications will be reviewed within six weeks of submittal.

**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)

- 9/4/25 NFRMPO Council Meeting
- 9/5/25 RAQC Board Meeting
- 9/16/25 RAQC Indirect Sources Technical Workgroup Meeting
- 9/17/25 RAQC Control Strategy Committee Meeting
- 9/17-19/25 AQCC Meeting

Other Anticipated Air Quality Activities

- EPA’s NAAQS Guidance
- EPA’s Ozone NAAQS Reconsideration
- EPA’s Reconsideration of the PM2.5 NAAQS

Recommendations:

- NFRMPO should continue to track the AQCC Ozone SIP Rulemaking for transportation related control strategies and analysis and decide whether or not to provide public comments
- NFRMPO should continue to track and engage on the evolution of the RAQC’s Blueprint

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<sup>10</sup> See CDPHE’s Air Quality Enterprise’s “Request for Proposal, RFP\_2025000002: New and Emerging Technologies”, for more information here: <https://cdphe.colorado.gov/enterprise-boards/air-quality-enterprise>



**Northern Colorado Mobility Committee — August Minutes**

**August 26<sup>th</sup>, 2025**

**1:00 p.m. – 3:30 p.m.**

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**Call Meeting to Order, Welcome, and Overview of Agenda**

**In Person:**

- Anna Rose Cunningham, Loveland
- Kristi Swasko, RAFT
- Jaclynn Streeter, GoNoCo34 TMO
- Ty Lamm, United Way Weld County
- Steve Teets, WAND
- Robyn Upton, WAND
- Irene Davila, Adeo
- Heidi Pruess, Larimer County
- Ari Edgely, Foothills Gateway

**Virtual:**

- Kimberly Aguilar-Pauli, Larimer County ARC
- Steve Conaway, RAFT
- Jacque Penfold, Community Member
- Dana Klein, Estes Park
- Co-Chair Jenna Robinson, SAINT
- Megan Kaliczak, zTrip
- Willow Cooper-Barton, ARC
- Trevor Trepanier, GET
- Mayra Orozco, Northern Colorado Health District
- Co-Chair Adriana Torres, Via Mobility
- Steve Conway, RAFT

**Staff:**

- Aaron Hull, NFRMPO
- Elizabeth Relford, NFRMPO

**Introductions & Icebreaker**

Aaron introduced and welcomed Elizabeth Relford, the new MPO Executive Director, to the NCMC. Then, both virtual and in-person attendees introduced themselves and their organizations.

**Public Comment**

No public comment.

**Approval of May Minutes**

Steve Teets made a motion to approve the May minutes, as amended to remove Steve's name, which was duplicated, with a second from Kristi Swasko. The Committee unanimously approved the amended minutes.

**November NCMC Meeting Date Discussion**

Aaron Hull explained to the Committee the timing of the November NCMC meeting, as it corresponds to the Planning Council's schedule for discussing the 2025 Coordinated Plan. Therefore, if the Committee would like to comment on the plan before the November 6<sup>th</sup> Planning Council meeting, it needs to reschedule the next regularly scheduled meeting from November 18<sup>th</sup> to November 4<sup>th</sup>.

Steve Teets made a motion to move the meeting from the third Thursday of the month to the First Thursday of November. Committee Member Swasko seconded the motion, and it was unanimously approved.

**Activity****Speed Networking.**

The in-person group participated in a speed networking exercise to get to know each other and learn more about their respective organizations and services. The remote participants provided updates about their organizations online.

**Presentations****RideNoCo Updates**



Aaron provided a Ride NoCo update. This year's calls are trending similarly to those of last year. Website visits are trending higher than expected at this time of year compared to the same period the previous year. The mobility staff are working on updating the call sheet to include new features/data points that reflect the updated demographics. Additionally, staff have added more questions to better capture service gaps.

Steve Teets asked staff how they attempt to identify gaps in service when they gather this information. Aaron said they do their best to arrange services when speaking with clients. After documenting the gaps, staff can help raise awareness within the organization, enabling them to communicate effectively through the network.

The group discussed how our organizations can share data to support one another, to help elected officials understand the importance of transportation for quality of life.

Aaron handed out updated Riders' Guides. Contact the NFRMPO if you would like copies sent to your agency.

Aaron also handed out updated Provider's Guide handouts to share with the group. Lisa is also working as an extensive resource guide. MPO staff will email out a PDF version to the group.

Aaron went over the upcoming RideNoCo events with the group. Wrapping up the summer outreach. If your organization has any holiday events you would like staff to attend, please notify us.

Aaron provided an update on the 2026 Aspen Club and RideNoCo Transportation Fairs. The group discussed the Aspen Club and its role in delivering holistic well-being care for aging populations.

## **2025 Coordinated Plan Update**

Aaron is finalizing the 2025 Coordinated Plan. Outreach is wrapping up, and the survey will close on Friday, August 29<sup>th</sup>. Organizations are encouraged to provide comments before it closes. The survey has been conducted for six months, and staff have received seventeen responses to date. Staff provided a summary of gaps identified in the survey responses.

Steve Teets suggested that the region consider establishing a Regional Transportation Authority (RTA) as a funding mechanism to enhance transportation services and options in our area.

Some concerns are that GET does not currently have a fixed bus route to the UC Health Hospital. Call-in-Ride is a service available to Greeley Hospital as an alternative option.

## **GoNoCo34 Presentation**



Jaclynn Streeter presented to the Committee about the GoNoCo34 TMO, a transportation management organization dedicated to improving mobility, reducing congestion, and promoting sustainable transportation options along the US 34 corridor.

Jaclynn updated the Committee on upcoming outreach events.

Jaclynn asked the Committee 2 questions:

1. What is the most critical transportation issue that affects your community? Some responses included:
2. How can the TMO support your organization?

Jaclynn received the following feedback from the questions asked:

- Medical transportation.
- After-school transportation needs for kids.
- Having a sound transportation system that covers all groups.
- Lack of information in our community about what our transportation options are.
- The need to have everything instantaneously on demand does not mean services are not available.
- First and last mile connections.
- Greeley has the fastest-growing population in the state. How do you redesign routes to offset existing needs and still address future needs?
- How do you manage expectations while ensuring funding for continuing service?
- Lack of connectivity not just routes, but with other organizational communications.

## Break

A break was taken at 2:39 p.m., and the NCMC meeting resumed at 2:51.

## Discussion



## **2025 TMO Call for Projects Information**

Aaron presented the TMO call for projects to support TMO efforts in the region. The MPO hired Steer to facilitate the creation of a TMO Guidebook and a Call for Projects framework. The funding is from the Carbon Reduction Program (CRP) for fiscal years 2024-2027, for \$400,000, with a local match of \$83,120, as currently identified in the TIP.

The call for projects has been modified from a TDM call to a TMO focus to align with the initial goal of establishing TMOs in the region.

Staff received feedback from entities regarding funding amounts and scoring criteria goals. Today, the staff is here to gather feedback from NCMC. The mobility staff will present recommendations to the TAC in September and discuss them with the Planning Council in October. The goal is to open the call for projects on November 7<sup>th</sup>.

Anna Rose had some technical questions for the staff and offered to coordinate after the meeting to keep the meeting on schedule. Her questions pertained to the TMO eligibility and funding minimum/maximum guidelines. Staff will post the updated guidebook on the NFRMPO website on Thursday.

## **Mobility Case Studies**

The first case study involves a Wellington caller who requires rides to physical therapy in Fort Collins twice a week. She is not sixty, so she cannot utilize the Senior Center Transportation Service to Fort Collins. The group discussed options for resolving this issue.

The second case study is a person who lives in Greeley and needs a ride to her doctor in Fort Collins. She is over sixty and does not have Medicaid. 60+Ride has a waitlist, and she is not in Via Mobility's service area. Taking Uber, Lyft, or zTrip is too expensive; she needs free or low-cost transportation options.

Excellent discussions from members on problem-solving options for staff to assist callers.

## **Wrap-Up + Round Table**

## **Announcements & Member Updates**

Loveland – Colt and Transfort are having open houses this upcoming Thursday in Loveland and Friday in Fort Collins to discuss the changes to the Flex Service (only). Colt is taking over the Loveland to Fort Collins portion of the service. Fort Collins will continue to run service to Boulder, but the hours will be modified.



Steve Teets mentioned the Spin program in Greeley is not working because the bikes are blocking the ADA ramps, so people with disabilities are struggling to get around them. I would like to see some training or educational classes offered to support the program's success. There is a need for more regulations, training, and education on where to leave bicycles. Steve Teets would like to have CDOT DTR provide an update on Bustang.

### **Upcoming Meetings:**

- A. Weld County Mobility Committee (WCMC): September 30<sup>th</sup>, 2025
- B. Larimer County Mobility Committee (LCMC): October 28<sup>th</sup>, 2025
- C. Northern Colorado Mobility Committee (NCMC): November 18<sup>th</sup>, 2025

NCMC adjourned the meeting at 3:38 p.m.

## MEMORANDUM

**To: NFRMPO Planning Council**

**From: Jonathan Stockburger**

**Date: September 4, 2025**

**Re: Draft FY2026–2029 Transportation Improvement Program (TIP)**

### **Narrative**

#### **Background**

The NFRMPO is drafting the Fiscal Years (FYs) 2026 - 2029 Transportation Improvement Program (TIP) to be in alignment with the 2050 Regional Transportation Plan (RTP) Amendment, air quality conformity determination and regional emissions analysis, and Colorado Greenhouse Gas (GHG) Transportation Report as well as to be in alignment with the CDOT FY2026-2029 Statewide TIP (STIP) as adopted May 15, 2025.

The Draft FY2026 - 2029 TIP includes all federally funded and/or regionally significant surface transportation projects programmed to receive funding in FY2026-2029. All projects with funding in the FY2024-2027 TIP with funds in FY2026-2029 will be carried over into the FY2026-2029, as well as projects which have had funds rolled from FY2025 into FY2026 and qualifying projects submitted during the TIP Project Submission window (December 2 – December 20, 2024). Any amendments or modifications made to projects or funding following August 20 will be incorporated upon the effective date of the TIP.

The Draft FY2026-2029 TIP carries forward the policies and procedures in the FY2024-2027 TIP with the following updates:

- One new project in TIP – WCR 66 Corridor;
- Updated TIP projects map;
- Updated tables and graphics;
- Various updates based on USDOT standards and requirements;
- TIP Amendment and Modification Instructions; and
- TIP/STIP Reconciliation Information.

The Draft Conformity Determination for the FY2026-2029 TIP and the 2050 RTP Amendment are under development and will be made available for a 30-day public review. The public comment period for the Draft FY2026-2029 TIP and the Conformity Determination is anticipated to open on September 5, 2025 and close on October 6, 2025.

The Draft FY2026-2029 TIP is available here: <https://nfrmpo.org/wp-content/uploads/FY2026-2029-TIP-Narrative-Draft.pdf>

#### **Recommendation**

Staff requests Planning Council review of the Draft FY 2026 – 2029 TIP.





## **MEMORANDUM**

**To: NFRMPO Planning Council**

**From: Becky Karasko**

**Date: September 4, 2025**

**Re: MMOF Funding Reconciliation**

### **Summary**

During the 2025 Legislative Session, the Colorado General Assembly pulled back \$71.4M in existing funding in the local MMOF program as part of settling a \$1.2B statewide budget deficit for FY2026, the Colorado General Assembly. After an increase of \$18.2M with reconciled revenues, the net reduction of local MMOF funding was \$53.2M. The retail delivery fee has been updated to show future funding of \$1.75M and the total local MMOF allocation through FY2029 will be updated to \$227.9M. The MMOF funds removal has resulted in years FY2023 to FY2025 being overprogrammed. Options for achieving compliance with the funding reduction include delaying a project, reducing the funding for a project, or canceling a project.

The NFRMPO TAC held two work sessions, one each during the June and July TAC meetings in addition to an impacted MMOF Project Sponsors meeting on July 24. Attached is a proposal with three scenarios discussed at the August TAC meeting.

### **Recommendation**

NFRMPO Staff request Planning Council members review the attached proposal and scenarios and come prepared to discuss them at the meeting.

DESCRIPTION	AMOUNT	NOTES
NFR MPO MMOF Overprogrammed	\$ 2,262,205	Per CDOT Table 1
RideNoCo Sustainable Funding reduction	\$ (170,000)	Alternative funding available
NFR MPO MMOF Overprogrammed revised	\$ 2,092,205	Scenario (1)

Taft Hill Road Corridor Project MMOF Award (Larimer County)	\$ 1,700,000	FY26 and FY27
STBG, Potentially Available for MMOF Swap to Waitlisted Projects	\$ 163,902	FY26 and FY27
CRP, Potentially Available for MMOF Swap to Waitlisted Projects	\$ 107,057	FY26
Taft Hill Road Corridor Project MMOF Award revised (Larimer County)	\$ 1,429,041	15.9388% reduction
NFR MPO MMOF Overprogrammed revised	\$ 1,821,246	Scenario (2)

On-Route Battery Electric Bus Chargers – STC MMOF Award (Fort Collins)	\$ 1,000,000	FY25
Award a Portion of Funding to Foothills Transit Station and Roundabout	\$ (600,000)	This project is made whole and ready for construction in FY27
Surrender Remaining Portion of Funding for Reallocation	\$ (400,000)	
On-Route Battery Electric Bus Chargers – STC MMOF Award revised (Fort Collins)	\$ -	Note: Project would be waitlisted for first available funding opportunity.
NFR MPO MMOF Overprogrammed revised	\$ 1,421,246	Scenario (3A)

10th Street Transit Vision MMOF Award (Greely)	\$ 450,000	FY24, FY25, and FY26
Award a Portion of Funding to MERGE US34 Region Mobility Hub	\$ (270,000)	Unconfirmed
Surrender Remaining Portion of Funding for Reallocation	\$ (180,000)	Unconfirmed
10th Street Transit Vision MMOF Award revised (Greely)	\$ -	Note: Project would be waitlisted for first available funding opportunity.
NFR MPO MMOF Overprogrammed revised	\$ 1,241,246	Scenario (3B)

Scenario (1)												
PROJECT NAME	AGENCY	FY23	FY24	FY25	FY26	FY27	FY28	FY29	ORIGINAL AWARD TOTAL	% Reduction	REVISED TOTAL	REDUCTION TO ORIGINAL AWARD
MERGE US34 Regional Mobility Hub	Greeley/CDOT	\$ 5,000,000	\$ 406,273						\$ 5,406,273	\$ 1,044,426	\$ 4,361,847	\$ 1,044,426
US 34 Transit Sidewalk Connectivity Project	City of Loveland					\$ 139,807	\$ 1,248,490		\$ 1,388,297	\$ 268,202	\$ 1,120,095	\$ 268,202
Foothills Transit Station and Roundabout	City of Fort Collins			\$ 107,504	\$ 210,165				\$ 317,669	\$ 61,370	\$ 256,299	\$ 61,370
Taft Hill Road Corridor Project	Larimer County				\$ 653,440	\$ 1,046,560			\$ 1,700,000	\$ 328,419	\$ 1,371,581	\$ 328,419
On-Route Battery Electric Bus Chargers – South Transit Center	City of Fort Collins			\$ 1,000,000					\$ 1,000,000	\$ 193,188	\$ 806,812	\$ 193,188
Weld County On-demand Transit Program	Weld County				\$ 152,250	\$ 201,930	\$ 213,481		\$ 567,661	\$ 109,665	\$ 457,996	\$ 109,665
10th Street Transit Vision	Greeley		\$ 383,788	\$ 48,255	\$ 17,957				\$ 450,000	\$ 86,935	\$ 363,065	\$ 86,935
TOTAL		\$ 5,000,000	\$ 790,061	\$ 1,155,759	\$ 1,033,812	\$ 1,388,297	\$ 1,461,971	\$ -	\$ 10,829,900	\$ 2,092,205	\$ 8,737,695	\$ 2,092,205

DESCRIPTION		AMOUNT	NOTES
NFR MPO MMOF Overprogrammed revised		\$ 2,092,205	
MMOF Funds Available for Reallocation		\$ 10,829,900	
Percentage of MMOF that need to be reallocated		19.32%	

YELLOW NOTES CHANGE

Scenario (2)												
PROJECT NAME	AGENCY	FY23	FY24	FY25	FY26	FY27	FY28	FY29	NEW AWARD TOTAL	% Reduction	REVISED TOTAL	REDUCTION TO ORIGINAL AWARD
MERGE US34 Regional Mobility Hub	Greeley/CDOT	\$ 5,000,000	\$ 406,273						\$ 5,406,273	\$ 932,494	\$ 4,473,779	\$ 932,494
US 34 Transit Sidewalk Connectivity Project	City of Loveland					\$ 139,807	\$ 1,248,490		\$ 1,388,297	\$ 239,459	\$ 1,148,838	\$ 239,459
Foothills Transit Station and Roundabout	City of Fort Collins			\$ 107,504	\$ 210,165				\$ 317,669	\$ 54,793	\$ 262,876	\$ 54,793
Taft Hill Road Corridor Project	Larimer County				\$ 549,290	\$ 879,751			\$ 1,429,040	\$ 246,486	\$ 1,182,554	\$ 246,487
On-Route Battery Electric Bus Chargers – South Transit Center	City of Fort Collins			\$ 1,000,000					\$ 1,000,000	\$ 172,484	\$ 827,516	\$ 172,484
Weld County On-demand Transit Program	Weld County				\$ 152,250	\$ 201,930	\$ 213,481		\$ 567,661	\$ 97,912	\$ 469,749	\$ 97,912
10th Street Transit Vision	Greeley		\$ 383,788	\$ 48,255	\$ 17,957				\$ 450,000	\$ 77,618	\$ 372,382	\$ 77,618
TOTAL		\$ 5,000,000	\$ 790,061	\$ 1,155,759	\$ 929,662	\$ 1,221,488	\$ 1,461,971	\$ -	\$ 10,558,940	\$ 1,821,246	\$ 8,737,694	\$ 1,821,247

DESCRIPTION		AMOUNT	NOTES
NFR MPO MMOF Overprogrammed revised		\$ 1,821,246	
MMOF Funds Available for Reallocation		\$ 10,558,940	
Percentage of MMOF that need to be reallocated		17.25%	

YELLOW NOTES CHANGE

Scenario (3A and 3B)												
PROJECT NAME	AGENCY	FY23	FY24	FY25	FY26	FY27	FY28	FY29	NEW AWARD TOTAL	% Reduction	REVISED TOTAL	REDUCTION TO ORIGINAL AWARD
MERGE US34 Regional Mobility Hub	Greeley/CDOT	\$ 5,000,000	\$ 676,273						\$ 5,676,273	\$ 706,052	\$ 4,970,221	\$ 436,052
US 34 Transit Sidewalk Connectivity Project	City of Loveland					\$ 139,807	\$ 1,248,490		\$ 1,388,297	\$ 172,685	\$ 1,215,612	\$ 172,685
Foothills Transit Station and Roundabout	City of Fort Collins			\$ 707,504	\$ 210,165				\$ 917,669	\$ 114,146	\$ 803,523	\$ (485,854)
Taft Hill Road Corridor Project	Larimer County				\$ 549,290	\$ 879,751			\$ 1,429,040	\$ 177,753	\$ 1,251,287	\$ 177,753
On-Route Battery Electric Bus Chargers – South Transit Center	City of Fort Collins								\$ -	\$ -	\$ -	\$ 1,000,000
Weld County On-demand Transit Program	Weld County				\$ 152,250	\$ 201,930	\$ 213,481		\$ 567,661	\$ 70,609	\$ 497,052	\$ 70,609
10th Street Transit Vision	Greeley								\$ -	\$ -	\$ -	\$ 450,000
TOTAL		\$ 5,000,000	\$ 676,273	\$ 707,504	\$ 911,705	\$ 1,221,488	\$ 1,461,971	\$ -	\$ 9,978,940	\$ 1,241,246	\$ 8,737,694	\$ 1,821,246

DESCRIPTION		AMOUNT	NOTES
NFR MPO MMOF Overprogrammed revised		\$ 1,241,246	
MMOF Funds Available for Reallocation		\$ 9,978,940	
Percentage of MMOF that need to be reallocated		12.44%	

YELLOW NOTES CHANGE