



NFRMPO Technical Advisory Committee (TAC)

Hybrid Meeting Agenda

October 15, 2025

In Person: Larimer County Loveland Campus, 200 Peridot Avenue, Loveland, CO

Virtual: Call-in Number: (224) 501-3412 **Access Code:** 115-932-509

Weblink: <https://meet.goto.com/NFRMPO/2025nfrtac>

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
1	Call Meeting to Order, Welcome, Introductions	Nicole Hahn, Chair	-	1:00
2	Public Comment - 2 min each	-	-	-
3	Approval of September 17, 2025 Meeting Minutes	Nicole Hahn	3	1:05

Lead Planning Agency for Air Quality Agenda

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
4	Regional Air Quality Council (RAQC) Updates	Tom Moore, RAQC	-	1:10
5	Air Pollution Control Division (APCD) Updates	Brendan Cicione, APCD	-	1:20

Metropolitan Planning Organization Agenda

Action Item

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
6	October 2025 TIP Amendment	Jonathan Stockburger	10	1:25

Presentation

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
7	NFRMPO 101	Becky Karasko	Handout	1:30



Discussion Items

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
8	WCR38 Functional Classification Change Request	Erika Rassmussen, Town of Mead Drew Pearson, Wilson & Company	14	1:45
9	TMO Call for Projects	Aaron Hull	Handout	2:00
10	GHG Transportation Report	Becky Karasko Jerome Rouser Mykayla Marek	24	2:15

Outside Partner Reports

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
11	NoCo Bike & Ped Collaborative	Written Report	Handout	-
12	Regional Transit Agencies	Verbal Report	-	-
13	Mobility Updates	Tanya Trujillo-Martinez	-	2:30

Reports

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
14	October Planning Council Meeting Summary Draft	Written Report	29	-
15	Mobility Committee Updates	Written Report	31	-
16	Quarter 3 2025 TIP Modifications	Written Report	35	-
17	NFRMPO Air Quality Program Updates	Written Report	36	-
18	Roundtable	All	-	2:45

Meeting Wrap Up:

- Next Month's Agenda Topic Suggestions
- Next NFRMPO TAC Meeting: November 19, 2025

**MEETING MINUTES of the
TECHNICAL ADVISORY COMMITTEE (TAC)
North Front Range Transportation and Air Quality Planning Council
Hybrid Meeting
September 17, 2025
1:05 p.m. – 2:59 p.m.**

TAC Members Present

Nicole Hahn, Chair – Loveland
Evan Pinkham, Vice Chair – Weld County
Emma Belmont – FTA
Aaron Bustow – FHWA
Brendan Cicione – CDPHE-APCD
Omar Herrera – Windsor
Tim Hoos – Johnstown
Dana Hornkohl – Fort Collins
Kim Koivuniemi – Timnath
Wesley LaVanchy – Eaton
Victoria Leonhardt – Greeley
Tom Moore – RAQC
Shani Porter – Severance
Eric Tracy – Larimer County

NFRMPO Staff:

Aaron Hull
Mykayla Marek
Elizabeth Relford
Jerome Rouser
Jonathan Stockburger
Tahjiba Tarannum
Tanya Trujillo-Martinez

TAC Members Absent:

Tawn Hillenbrand – Berthoud
Town of Milliken
Town of Garden City
Town of LaSalle

In Attendance:

AnnaRose Cunningham – Loveland
Cody Davis – Muller Engineering
Candice Folkers – COLT
Renaë Jording – GET
Tamara Keefe – FHU
Joshua Ma – Transfort
Dee McIntosh – CDOT
Eric Patton – Transfort
Drew Pearson – Wilson & Company
Scott Pearson – Windsor
Jaclynn Streeter – GoNoCo34 TMO

Call to Order

Chair Hahn called the meeting to order at 1:05 p.m.

Public Comment

There was no public comment.

APPROVAL OF THE AUGUST 20, 2025 TAC MINUTES

Hornkohl moved to approve the August 20, 2025 TAC Minutes. Pinkham seconded the motion, which was approved unanimously.

Consent Agenda

2050 RTP Amendment

Pinkham moved to recommend the Planning Council approve the 2050 RTP Amendment. Hornkohl seconded the motion, which was approved unanimously.

Air Quality Agenda

Regional Air Quality Updates

Moore summarized what is included in the updated Blueprint. This includes draft recommendations, ozone air quality planning context for the NFRMPO region, emission control strategies, a control strategy blueprint summary for stakeholder review, and a blueprint endorsement consideration process by the RAQC board. Moore reminded the TAC of the Control Strategy Blueprint timeline. He summarized the engagement opportunities throughout the Blueprint process, including workshops, comment opportunities, RAQC Board meetings, Control Strategy Committee meetings, Indirect Source Emission Reduction Workgroup meetings, and Air Quality Control Commission meetings. Moore explained the supplemental documents included in the Blueprint, such as 20 briefing papers for control strategy concepts, a Stakeholder Engagement Information document, and the Blueprint Development Policy document. Moore reminded everyone that the primary recommendation of the Blueprint is to achieve attainment of the 70 ppb National Ambient Air Quality Standard for ozone in the 2030-32 period.

Relford asked if the RAQC would continue to look through the new data on background ozone and posting it to the website, which was brought up in previous meetings. Moore responded that they are currently redoing their modeling with that data. Moore stated the modeling results will be available at a virtual forum at the end of October or beginning of November.

APCD Updates

Cicione noted the hearings from the August AQCC meeting. Cicione stated the first hearing was to consider a designation recommendation for EPA's revised secondary SO₂ NAAQS standard. He stated the second hearing was for the Commission to consider establishing a new regulation number 31, the landfill methane regulation, to address municipal solid waste for landfill greenhouse gas controls and monitoring requirements. Cicione highlighted the upcoming AQCC meeting in October, which will be a joint meeting with the Board of Health. Cicione stated the October meeting will also include a review of the 2025 ozone season and monitoring data. Cicione announced that the Clean Fleet Enterprise is accepting applications for the Clean Fleet Vehicle and Technology Grant Program from September 15, 2025 to October 24, 2025.

Metropolitan Planning Organization Agenda

Presentation Items

GoNoCo34 TMO Presentation

Jaclynn Streeter, GoNoCo34 TMO, introduced the TMO and provided updates on what the organization has been working on. Streeter explained the TMO's services and activities which fall under three buckets: outreach and education, transportation services, and regional collaboration. She provided a FY2024-2025 year in review, presented the Q1 workplan recently approved by the TMO Board, explained she is a part-time Executive Director of the TMO, and that the TMO is constantly seeking additional funding to expand to full-time operations

Hahn reminded local agencies to keep the TMO in mind during budget conversations for next year. Hahn recommended that local agencies should connect developers along the US34 corridor with the TMO and the City of Loveland has already been doing this. Streeter added it would be helpful to have contact information for groups to present to or for groups that should be involved in the TMO such as development groups or Chamber of Commerce organizations.

Relford asked Streeter to explain what else the TMO does for the local communities and connecting people with programs such as VanGo™. Streeter shared the TMO has a fee for service option if membership, sponsorship, or donations are not a right fit for local governments. Streeter stated this is for anyone that needs help on a specific project with outreach, communications, or marketing. She explained the TMO can be hired to implement these portions of a project. Streeter mentioned they push programs such as VanGo™ to people interested in alternative transportation options along the US34 corridor.

Action Items

FY25 TIP Delay Review

Stockburger explained that 26 projects were subject to the FY25 TIP delay review procedure, with six projects delayed for the 1st time, one project delayed for the 2nd time, four projects delayed for the 3rd time, and 15 additional projects subject to the delay review but met the milestone deadline to not be delayed. Stockburger announced that communities with projects up for a 3rd delay should be prepared to provide a 2-minute presentation at the October Planning Council meeting about why the project is delayed, how certain the Ad Date provided is, and what steps are being taken to ensure the milestone is met.

Stockburger discussed some of the projects that are not delayed or potentially not delayed anymore. Stockburger announced that the 59th Avenue and O Street Roundabout project went to Ad and is not delayed anymore. Stockburger asked if the US287 Intersection Improvements project went to Ad. Hornkohl responded that it has not, and they are only waiting on FHWA and are positive the project will go to Ad before September 30. Stockburger stated this project will be designated as not delayed.

Stockburger stated there will be a follow up for the TIP Delay with the MMOF projects once the reconciliation gets approved.

Hahn asked for clarification on the projects that will need to be presented at the October Planning Council meeting. Stockburger responded that the projects are the WCR13 Alignment Improvements from Windsor, CR19 (Taft Hill Road) Improvements from Fort Collins, US34 Widening – Boise to Rocky

Mountain from Loveland, and 83rd Ave Roadway Improvements from Greeley. Pinkham asked what the 83rd Ave Roadway Improvements project from Greeley includes. Leonhardt responded she would check with City of Greeley engineers.

Hornkohl moved to recommend the Planning Council approve the FY25 TIP Delay Review for 1st delays. Pinkham seconded the motion, which was approved unanimously.

Hornkohl moved to recommend the Planning Council approve the FY25 TIP Delay Review for 2nd and 3rd delays. Koivuniemi seconded the motion, which was approved unanimously.

FY2026-2029 Transportation Improvement Program (TIP)

Stockburger explained the TIP narrative and tables provide an overview of the TIP process and various projects and funding information. Stockburger described the updates made to the TIP narrative and tables. Stockburger stated the public comment period opened on September 5, 2025, and will close on October 6, 2025. Relford mentioned there is an additional modification being made to the FY2026-2029 TIP which is due to CDOT completing negotiations for construction package 3 for I-25 Segment 5. Relford explained the modification is to move some funding for the project from FY25 to FY26, and TAC recommendation would include this modification.

Hahn asked if the updated CDOT 10-Year Plan has been approved yet. Relford responded it has not, but the funding for this was identified in the previous CDOT 10-Year Plan which has already been approved.

Hornkohl moved to recommend the Planning Council approve the FY2026-2029 Transportation Improvement Program (TIP). Pinkham seconded the motion, which was approved unanimously.

MMOF Funding Reconciliation

Hahn stated the three scenarios for MMOF Funding Reconciliation were presented at Planning Council in September, and Planning Council was in support of Scenario 3. Hornkohl summarized all three scenarios, which included funding amount changes for impacted projects. He explained Scenario 3 removes the Fort Collins Route Battery Electric Bus Chargers, takes a portion of the \$1M to fully fund Foothills Transit Station and removes the funding from Greeley's 10th St Transit Vision with this project being waitlisted for future available funding, takes a portion to fully fund MERGE, the removal of \$170k of the NFRMPO's RideNoCo Sustainable Funding Project, and distributes the remaining needed reduction across the remaining five projects. Hornkohl stated each remaining project has a funding reduction of 12.44 percent.

Hahn stated that in future calls for projects, it would make sense to prioritize funding the projects from Fort Collins and Greeley that had funding completely taken away through this reconciliation process.

Pinkham moved to recommend the Planning Council approve Scenario 3 for the MMOF Funding Reconciliation. Koivuniemi seconded the motion, which was approved unanimously.

Discussion Items

GHG Transportation Report

Rouser provided an overview of the draft GHG Transportation Report. He explained this is a requirement of Colorado's Greenhouse Gas (GHG) Transportation Planning Standard adopted by the Transportation Commission in 2021. Rouser presented the approval schedule, what is new in this version of the report, what stayed the same, the amount of GHG reductions required by year, and summarized the strategies used to reduce GHG. Rouser explained that due to modeling issues, the numbers for modeled GHG reductions by year are not yet available but will be shared as soon as they are. Rouser shared that the concurrent process for the NFRMPO's Conformity Determination passed for all compliance years.

Drew Pearson, Wilson & Company, asked about frequency of the Conformity Determination. Relford responded that a Conformity Determination must be done when an RTP update or amendment is done that includes projects that meet the criteria for regional significance. Relford explained this includes a capacity expansion project on a regionally significant corridor. Pearson asked what the frequency of the GHG process is. Relford responded that GHG compliance is done at the same time as Conformity Determinations.

SB25-30 Update

Rouser provided updates on SB25-30: Increase Transportation Mode Choice Reduce Emissions. He explained it is required for local governments with a population of more than 5,000 within an MPO boundary, and this applies to all NFRMPO communities except Garden City and LaSalle. Rouser described what needs to be included from NFRMPO communities in their transit and active transportation inventory and that it must be submitted to the NFRMPO by December 31, 2025. Rouser stated the MPO deadline to complete the transit and active transportation inventory using the inventory information submitted by NFRMPO communities is July 1, 2026. Additionally, by October 1, 2026, CDOT and MPOs must provide a report on the inventories to the Transportation Legislative Review Committee (TLRC). Rouser provided a list of project types to be included in this inventory, which includes projects that address walkability, bikeability, transit, and are multimodal. Rouser also provided a list of ineligible project types for this inventory.

Hahn asked for clarification on why this requirement is being introduced. Rouser explained that SB25-30 originally was introduced with more requirements such as creating a Mode Choice Plan, but the bill got watered down to an inventory and not a plan. Rouser stated that his best guess as to why this was introduced was to inform the TLRC on active transportation funding needs.

Hahn asked if the NFRMPO considered having communities submit this using GIS or a similar tool. Rouser responded that he could investigate it as an additional submission, but the spreadsheet submittal would still be required.

TAC Members discussed how burdensome the requirements are and if it is possible to bring this to the attention of their elected officials and to the Transportation Commission.

Hornkohl asked what non-compliance looks like for the NFRMPO and local communities. Rouser and Relford responded that there is no punishment for not submitting the inventory other than the TLRC might not see the active transportation funding needs.

Outside Parter Reports

NoCo Bike and Ped Collaborative

Written report provided.

Regional Transit Agencies

Ma shared that Transfort is undergoing a system optimization study.

Hahn shared that the FLEX bus service has been undergoing some changes through a collaborative effort with other communities.

Mobility Updates

Trujillo-Martinez stated they have been busy with engagement out in the community and with their partners. Trujillo-Martinez shared that they have created a new Riders Guide and are in the process of creating a robust Providers Guide.

Reports

September Planning Council Meeting Summary Draft

Written report provided.

Mobility Committee Updates

Written report provided.

NFRMPO Air Quality Program Updates

Written report provided.

Roundtable

Pinkham shared that Weld County is wrapping up their Safety Action Plan, and they will have a final Safety Task Force Meeting and a final meeting with their Board of County Commissioners in October. He stated they anticipate adopting the plan in October.

Tracy stated that Larimer County's Transportation Master Plan is going to their Planning Commission tonight. He shared that originally, their Board of County Commissioners recommended adopting the plan, but in between the meeting with the Board and their Planning Commission, they received a letter from the US Attorney General about removing certain language from the plan. Tracy shared they had to go through the plan, remove the language, and then brought the plan to their Planning Commission and

they did not approve it since it changed from when the Board recommended approval. Their Board has now recommended approval with the changes, so they anticipate the Larimer County Planning Commission will approve the plan tonight.

Hornkohl shared that the Fort Collins Strategic Trail Plan was adopted earlier in the summer. Hornkohl stated that the Power Trail underpass at Harmony Road was readvertised, and construction will begin in November of this year. He explained that the Siphon overpass is currently under construction, but they are waiting on an opportunity to deenergize the PRPA line immediately adjacent to the project.

Relford mentioned the MPO has been discussing not using GoTo for meetings anymore. Relford stated the MPO is working on many plans right now, including the 2025 Coordinated Plan which will be shared with TAC Members for their feedback.

Koivuniemi shared Timnath will be putting out an RFP for a Safety Action Plan soon.

Hahn shared that Loveland will also be putting out an RFP for a Safety Action Plan soon.

Meeting Wrap-Up

Final Public Comment

There was no final public comment.

Next Month's Agenda Topic Suggestions

None.

Meeting adjourned at 2:59 p.m.

Meeting minutes submitted by: Mykayla Marek, NFRMPO Staff

The next meeting will be held at 1:00 p.m. on Wednesday, October 15, 2025, as a hybrid meeting.

MEMORANDUM

To: NFRMPO Technical Advisory Committee

From: Jonathan Stockburger

Date: October 15, 2025

Re: Action – October 2025 TIP Amendment

Objective

To recommend Planning Council approval of the October 2025 Transportation Improvement Program (TIP) Amendment to the *FY2024-FY2027 TIP*.

Summary

The October 2025 TIP Amendment includes one project addition and two project removals from various regional agencies:

- Adding the Larimer County new project *County Road 50E Corridor Planning & Design* with \$1,160,850 Federal BUILD Funding and \$290,215 Local Funding in FY26.
- Removing the Fort Collins project *On-Route BEB Chargers - STC* as part of MMOF reconciliation efforts. Portion of funding goes to Fort Collins *Foothills Transit Station* project.
- Removing the Greeley project *10th Street Transit Vision* as part of MMOF reconciliation efforts. Portion of funding goes to Greeley *MERGE* project.

The 30-day Public Comment period for the October 2025 TIP Amendment will begin when all materials are collected from project sponsors.

Funding Types and Uses

BUILD – The Better Utilizing Investments to Leverage Development (BUILD) (formerly RAISE) is a discretionary grant program for investments in surface transportation infrastructure that will have a significant local or regional impact

Multimodal Transportation and Mitigation Options Fund (MMOF) is a funding source established by the State through Senate Bill (SB) 18-001 and amended with SB21-260 with the goal to complete an integrated multimodal system. Projects eligible for MMOF include operating and capital cost for fixed-route or on-demand transit, Transportation Demand Management (TDM) programs, multimodal mobility projects enabled by new technology, multimodal transportation studies, bicycle and pedestrian projects, modeling tools, and greenhouse gas mitigation projects.

Analysis

- **Advantages:** TAC recommending approval by the NFRMPO Planning Council will ensure available funds are assigned to projects in a timely manner and the *FY2024-2027 TIP* remains fiscally constrained.
- **Disadvantages:** None



Recommendation

Staff supports adding the October 2025 TIP Amendment to the FY2024-2027 TIP.

Attachments

- October 2025 Policy Amendment Form

NEW ENTRY

Title: County Road 50E Corridor Planning & Design
Sponsor: Larimer County
STIP ID:
TIP ID: 2026-012
Type: Safety
Air Quality: Excluded from conformity analysis
Description: Planning, design, and pre-construction activities of multimodal and safety improvements for Larimer County Road 50E (LCR 50E).

Funding Source	Funding Program	FY 24-27 TOTAL	FY24 Rolled	FY 24	FY25 Rolled	FY 25	FY 26	FY 27	Previous Funding	Future Funding
Federal	BUILD	\$1,160,850	\$0	\$0	\$0	\$0	\$1,160,850	\$0	\$0	\$0
Local	L	\$290,215	\$0	\$0	\$0	\$0	\$290,215	\$0	\$0	\$0
	Total	\$1,160,850	\$0	\$0	\$0	\$0	\$1,451,065	\$0	\$0	\$0

Revision # Revision Description
2025-A10 New Project

PREVIOUS ENTRY

Title: On-Route BEB Chargers - STC
Sponsor: Fort Collins
STIP ID: SST7077.054
TIP ID: 2025-004
Type: Capital
Air Quality: Exempt from conformity analysis
Description: Design, purchase, and installation of two (2) on-route battery electric bus (BEB) chargers at the Transfort South Transit Center (STC).

Funding Source	Funding Program	FY 24-27 TOTAL	FY24 Rolled	FY 24	FY25 Rolled	FY 25	FY 26	FY 27	Previous Funding	Future Funding
State	MMOF	\$1,000,000	\$0	\$0	\$0	\$1,000,000	\$0	\$0	\$0	\$0
Local	L	\$1,000,000	\$0	\$0	\$0	\$1,000,000	\$0	\$0	\$0	\$0
	Total	\$2,000,000	\$0	\$0	\$0	\$2,000,000	\$0	\$0	\$0	\$0

NEW ENTRY

Title: On-Route BEB Chargers - STC
Sponsor: Fort Collins
STIP ID: SST7077.054
TIP ID: 2025-004
Type: Capital
Air Quality: Exempt from conformity analysis
Description: Design, purchase, and installation of two (2) on-route battery electric bus (BEB) chargers at the Transfort South Transit Center (STC).

Funding Source	Funding Program	FY 24-27 TOTAL	FY24 Rolled	FY 24	FY25 Rolled	FY 25	FY 26	FY 27	Previous Funding	Future Funding
State	MMOF	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Local	L	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Revision # Revision Description
2025-A10 Removing project as part of MMOF reconciliation efforts - moves funding to Foothills Transit Station project.

PREVIOUS ENTRY

Title: 10th Street Transit Vision
Sponsor: Greeley
STIP ID:
TIP ID: 2025-014
Type: Multimodal Transportation Study
Air Quality: Excluded from conformity analysis
Description: Study, envision the long-range goals of, and plan next steps for the 10th Street Premium Transit Corridor.

Funding Source	Funding Program	FY 24-27 TOTAL	FY24 Rolled	FY 24	FY25 Rolled	FY 25	FY 26	FY 27	Previous Funding	Future Funding
State	MMOF	\$450,000	\$0	\$0	\$0	432,043	\$17,957	\$0	\$0	\$0
Local	L	\$150,000	\$0	\$0	\$0	145,000	5,000	\$0	\$0	\$0
	Total	\$600,000	\$0	\$0	\$0	\$577,043	\$22,957	\$0	\$0	\$0

NEW ENTRY

Title: 10th Street Transit Vision
Sponsor: Greeley
STIP ID:
TIP ID: 2025-014
Type: Multimodal Transportation Study
Air Quality: Excluded from conformity analysis
Description: Study, envision the long-range goals of, and plan next steps for the 10th Street Premium Transit Corridor.

Funding Source	Funding Program	FY 24-27 TOTAL	FY24 Rolled	FY 24	FY25 Rolled	FY 25	FY 26	FY 27	Previous Funding	Future Funding
State	MMOF	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Local	L	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Revision #	Revision Description
2025-A10	Removing project as part of MMOF reconciliation efforts - moves funding to MERGE project.



MEMORANDUM

To: NFRMPO Technical Advisory Committee

From: Becky Karasko

Date: October 15, 2025

Re: WCR38 Functional Classification Change Request

Summary

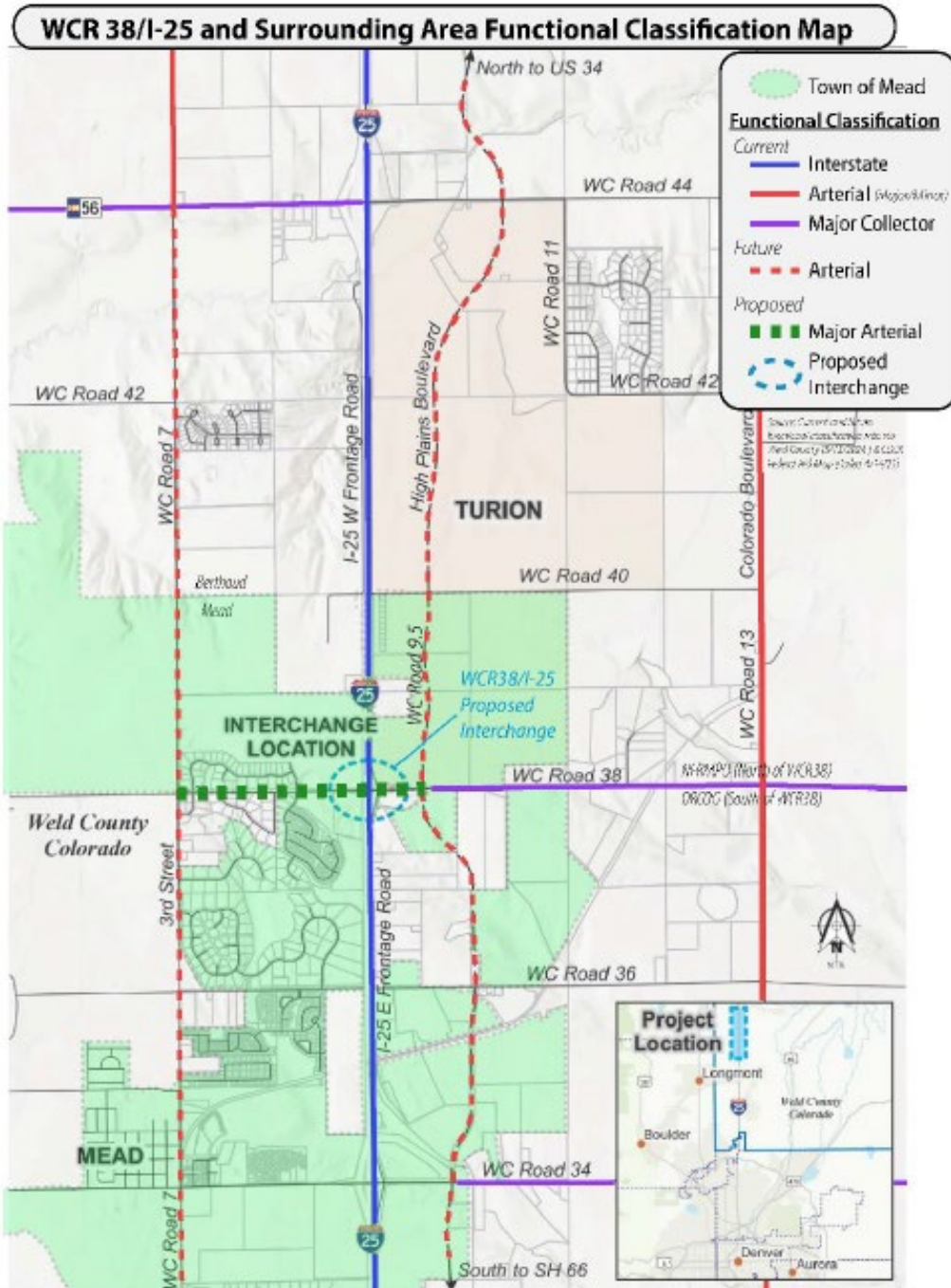
FHWA requires functional classification changes to roadways within MPOs to be submitted to and approved by those MPOs prior to being submitted to FHWA for review. In July, the NFRMPO received a request from the Town of Mead to change the functional classification of Weld County Road (WCR) 38. The road is currently classified as a Collector and the Town of Mead is requesting the classification be revised to Major Arterial. A map of the project location is provided in Attachment 1. The NFRMPO has reviewed the proposed change and determined that it conforms to the federal functional classification guidance.

Recommendation

NFRMPO Staff request TAC members review the attached Functional Classification Change request (Attachment 2) and provide feedback at the October TAC Meeting.



Attachment 1: Project Location



To: Jim Eussen, CDOT Region 4 Planning Manager
Becky Karasko, NFRMPO Transportation Planning Director

From: Erika Rasmussen, Public Works Director, Town of Mead

CC: Tim Kemp, Construction Administration Lead, Wilson & Company; Robert Eck, Land Asset Strategies; Abra Geissler, CDOT I-25 North Program Manager; Charla Glendening, Planning Practice Lead, Wilson & Company

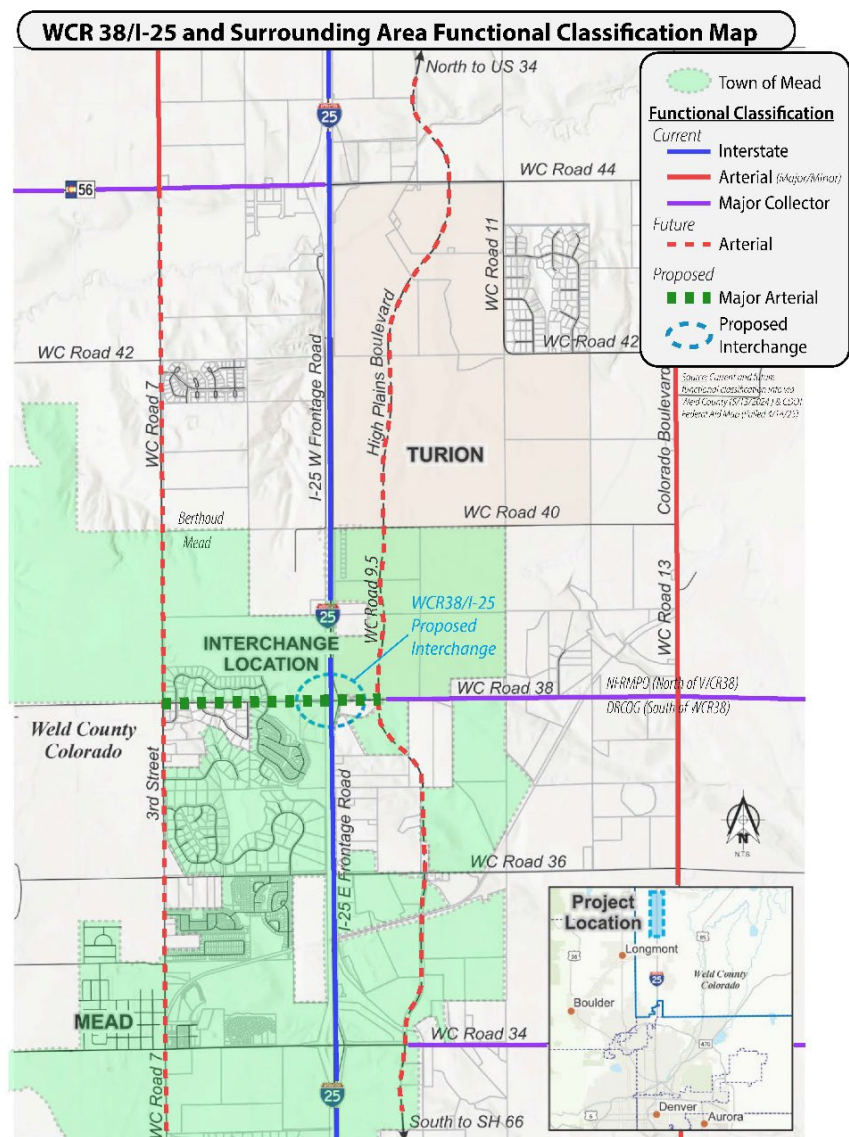
Date: May 12th, 2025

Re: I-25/WCR 38 Interchange: Functional Classification Change for WCR 38 from WCR 7 to WCR 9.5 (High Plains Boulevard)

Figure 1. Project Location

Background

The Town of Mead is developing a 1601 System Level Study for a new interchange at I-25 and Weld County Road (WCR) 38, see Figure 1. A Phase I Technical Memo was submitted to CDOT Region 4 on March 21, 2025. The memo includes a compilation and analysis of existing land use, safety, and traffic data to support the determination of the purpose, needs, and goals of the interchange project. Per 1601 Policy Directive, roads that connect to an interchange shall be functionally appropriate to support the network. According to the North Front Range Metropolitan Planning Organization (NFRMPO) Regional Transportation Plan (RTP), WCR 38 was designated as a Collector for modeling purposes to account for future growth. The Mead Transportation Master Plan (2018) indicates WCR38 as a future Arterial where it interchanges with I-25. The purpose of designating an Arterial adjacent to an Interstate is to encourage local traffic to utilize the Arterial for local trips and avoid the use of the interstate for these purposes.



Additionally, roads interchanging with interstates should carry a classification that reflects their strategic regional importance, not just current volume or rural/urban designation.

Current Roadway Classification - Unclassified

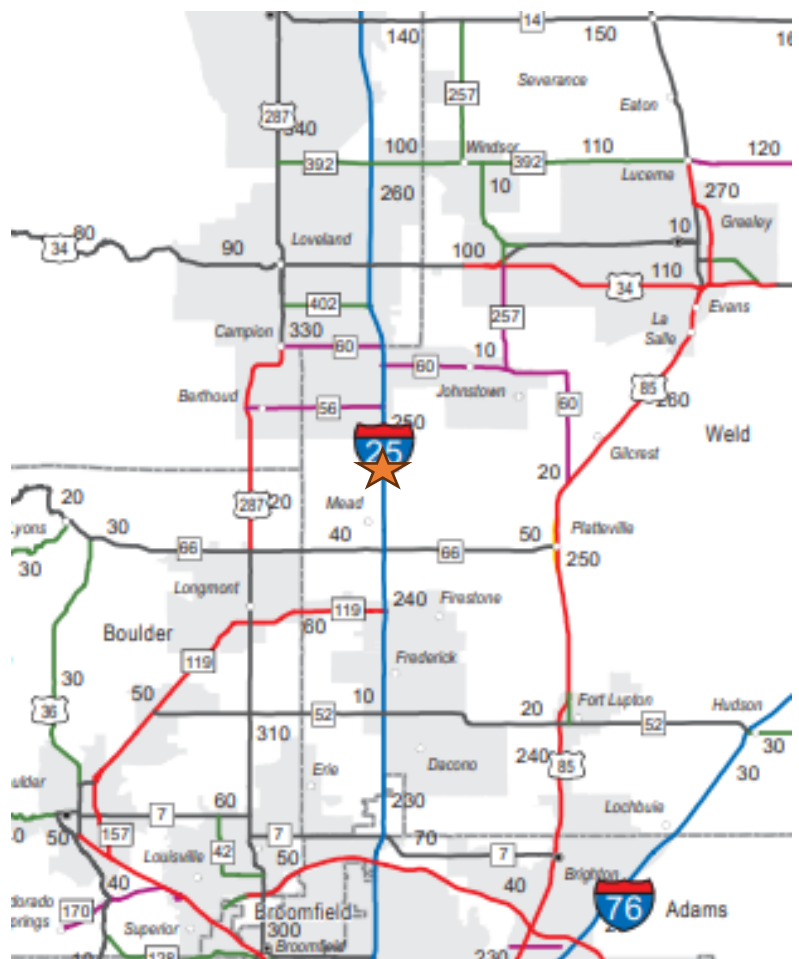
According to CDOT and Weld County, WCR38 between WCR 7 and WCR 9.5 is currently an unclassified local roadway. To the East, WCR 38 between WCR 9.5 and WCR 13 is currently designated as a Major Collector. Collectors typically gather traffic from local roads and funnel traffic to the Arterial network. In rural areas, such as Mead, Collectors generally serve primarily intra-county travel (rather than statewide) and constitute routes where predominant travel distances are shorter and speeds are more moderate. See Figure 2 for current regional Functional Classification of CDOT routes.

Proposed Roadway Classification – Major Arterial (Rural)

In anticipation of a new interchange with I-25, WCR 38 between WCR 7 and WCR 9.5 should be designated as at least a Minor Arterial, and ideally a Major Arterial. Arterials demonstrate the following characteristics:

- Predominant route between major activity centers
- Interstate or interstate functionality
- Long trip lengths
- Heavy travel densities
- Link cities and larger towns (or major resorts)
- Spaced at intervals so that all developed areas are within a reasonable distance of an arterial
- Interconnects the network of arterial highways

Figure 2. Regional Functional Classification

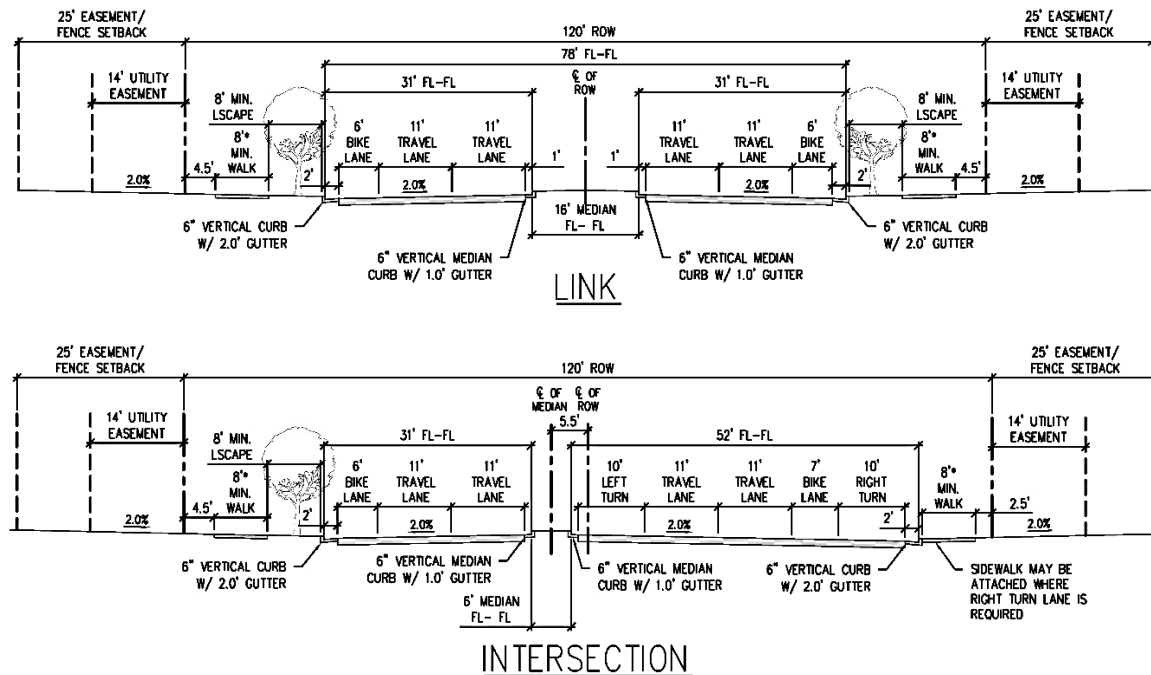




Functional Classification Request

In accordance with the 2024 [CDOT Roadway Functional Classification Guidance Manual](#), the purpose of this memo, is to notify the CDOT Region 4 Planner with the intent to request a change in functional classification. Once comments from the CDOT planner have been addressed, Mead will make a written request to the NFRMPO with the following information:

1. **Road Name:** Weld County Road 38
2. **County:** Weld
3. **Beginning and End Point:** WCR 7 (3rd Street) to WCR 9.5 (High Plains Boulevard)
4. **Total miles:** 1.5
5. **Description of the road segment:** WCR 38 is currently a two-lane, undivided road segment with little to no shoulder. WCR 38 serves as a primary east-west travel shed serving Mead and Berthoud.
6. **Traffic Volumes:**
 - Current volumes were collected during a three-day period from April 30 – May 2, 2024 (Tuesday-Thursday). Average AM Peak is 16 vpd E/B, and 25 W/B, and PM Peak is 25 vpd E/B, and 45 vpd W/B.
 - Future volumes are estimated to be approximately 15,000 vpd west of I-25 and 21,000 vpd east of I-25.
7. **Speed Limit:** 45 mph
8. **Current and Proposed Classification:**
 - Current classification is Collector
 - Proposed Classification is Major Arterial



As depicted above, Mead's typical section for the proposed Major Arterial will include the following:

Major Arterial Typical Characteristics- Mead, CO	
<i>Right-Of-Way Width</i>	120'
<i>Roadway Width</i>	80'
<i>Travel Lanes</i>	4 lanes, 11' wide
<i>Bike Lanes</i>	2 lanes, 6' wide
<i>Sidewalk</i>	8' min wide, 8' min landscape buffer
<i>Median</i>	16' wide
<i>Curb and Gutter</i>	6" vertical w/ 2' gutter
<i>Access</i>	Driveways are not allowed on arterials - unless approved by the Town Engineer
<i>Design Speed</i>	50 MPH
<i>Posted Speed</i>	40 MPH
<i>Parking</i>	None



Additional Justification

Improve Safety

Proposed future growth, traffic demand, and land use changes will present increased challenges for vehicle and bike/ped safety in the Mead to Berthoud I-25 travel shed area. The proposed Arterial network will help address increased conflicts between vehicles and multimodal traffic by providing adequate travel lanes and designated lanes for bikes and pedestrians.

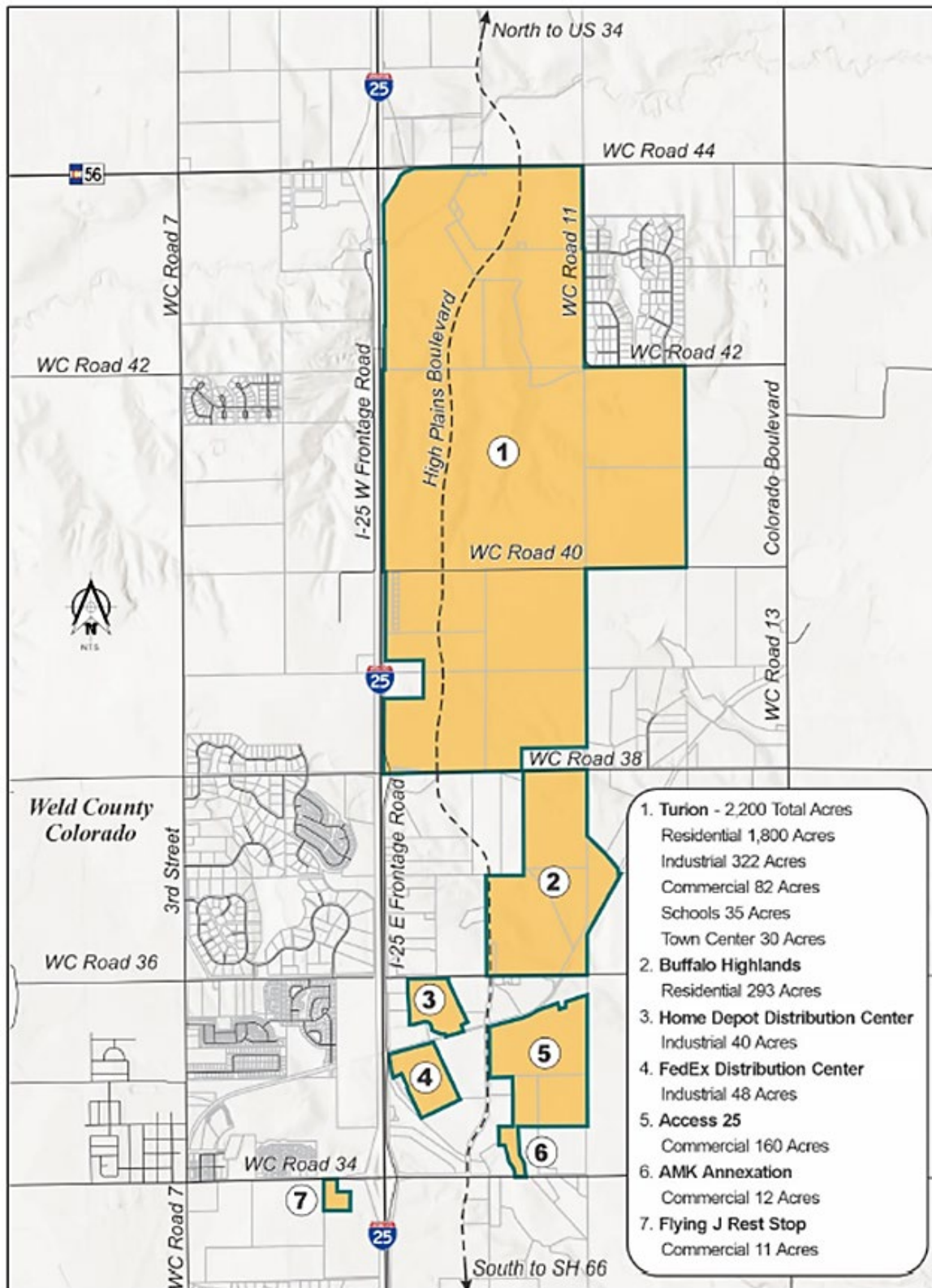
WCR 38 serves as the primary route leading to redundant north-south travel along I-25, which is used by emergency response and incident management. These redundant routes are critical to shorten distances between fire stations and hospitals and provide alternative routes when the Interstate is closed.

Approved/Active Development Plans

The Town of Mead and the Town of Berthoud comprehensive plans identify future land uses in the area as Business Park, Regional Commercial, Industrial Mixed Use, Residential Mixed Use, and varying density Residential uses (multifamily and single-family at urban and suburban densities). Seven new developments planned within the Mead to Berthoud I-25 travel shed have either been approved or are actively pursuing approvals through the Mead or Berthoud development review processes. The largest of these is Turion Development.

Buildout of combined planned developments will generate over 100,000 daily one-way external trips daily.

Development Name	Total Size	Land Use	Size by Use
Buffalo Highlands	293 Acres	Residential	293 Acres
AMK Annexation	12 Acres	Commercial	12 Acres
Turion Development	2,200 Acres	Residential	1,180 Acres
		Town Center	30 Acres
		Commercial	82 Acres
		Industrial/Office	322 Acres
		Schools	35 Acres
Access 25	160 Acres	Commercial	160 Acres
Flying J Truck Stop	11 Acres	Commercial	11 Acres
Home Depot Distribution Center	48 Acres	Industrial/Office	45 Acres
FedEx Distribution Center	40 Acres	Industrial/Office	40 Acres



Reference Photos



WCR 38 at I-25 Street, view west



WCR 38 between I-25 and Margil Road, view west



WCR 38 at Margil Road, view west



WCR 38 at 3rd Street, view west

MEMORANDUM

To: NFRMPO Technical Advisory Committee (TAC)

From: Becky Karasko

Date: October 15, 2025

**Re: Discussion #2 – NFRMPO Greenhouse Gas (GHG)
Transportation Report**

Objective

TAC review and feedback on the GHG emissions results and the *Draft GHG Transportation Report*.

Summary

The NFRMPO's *GHG Transportation Report* demonstrates the *2050 Regional Transportation Plan (RTP) Amendment* complies with Colorado's greenhouse gas (GHG) Transportation Planning Standard ("GHG Planning Standard"). The *GHG Transportation Report* was developed to meet the criteria specified in Colorado Revised Statutes §43-4-1103 and the Code of Colorado Regulations ([2 CCR 601-22, Section 8.02.5.1](#)).

GHG emissions results in million metric tons (MMT) per year are presented in **Table 1**.

The *GHG Transportation Report* will be open for the 30-day public comment period from October 6, 2025 through November 4, 2025. Any comments received will be incorporated as applicable. Following the opening of the public comment period, the report will be sent to CDOT and CDPHE on October 6, 2025 for their review prior to the Transportation Commission meeting on November 19, 2025 and approval on November 20, 2025. Following Transportation Commission's approval for the *GHG Transportation Report*, it will be brought back to Planning Council for approval and adoption at the December 4, 2025 meeting.

The Draft GHG Transportation Report can be found at the following link: <https://nfrmpo.org/wp-content/uploads/2025-GHG-Transportation-Report.pdf>

Recommendation

NFRMPO Staff requests TAC members review and provide feedback on the GHG emissions results and the *Draft GHG Transportation Report*.

Attachments

- **Table 1:** GHG Emissions Results, Million Metric Tons (MMT) per Year



Table 1: GHG Emissions Results, Million Metric Tons (MMT) per Year

	2025*	2029*	2030	2040	2050
Baseline Plan: 2045 RTP	1.55	1.41	1.40	1.01	0.64
Updated Plan: 2050 RTP Amendment	1.45	1.31	1.28	0.90	0.57
Reduction	0.10	0.10	0.12	0.11	0.07
Required GHG Reduction Level	0.04	0.06	0.12	0.11	0.07
Pass/Fail	Pass	Pass	Pass	Pass	Pass

* All values for 2025 and 2029 are interpolated



Draft GHG Transportation Report: Discussion #2

NFRMPO Technical Advisory Committee
October 15, 2025



Colorado's Greenhouse Gas (GHG) Transportation Planning Standard



- Standard adopted by Colorado Transportation Commission (TC) in 2021
- MPOs and CDOT must demonstrate reductions in GHG emissions compared to “baseline plans”
- Applies to NFRMPO Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP)
- GHG Transportation Report reviewed by Air Pollution Control Division (APCD); approved by TC



Draft NFRMPO GHG Emissions Analysis



GHG Emissions Results, Million Metric Tons (MMT) per Year

	2025*	2029*	2030	2040	2050
Baseline Plan: 2045 RTP	1.55	1.41	1.40	1.01	0.64
Updated Plan: 2050 RTP Amendment	1.45	1.31	1.28	0.90	0.57
Reduction	0.10	0.10	0.12	0.11	0.07
Required GHG Reduction Level	0.04	0.06	0.12	0.11	0.07
Pass/Fail	Pass	Pass	Pass	Pass	Pass

* All values for 2025 and 2029 are interpolated

3

GHG Transportation Report Timeline



Activity	Date
TAC 1 st Discussion	September 17
Council Discussion	October 2
Submit to APCD and CDOT/TC	October 6
Public Comment Period Opens	October 6
TAC 2nd Discussion	October 15
Public Comment Period Closes	November 4
TAC Recommendation and TC Workshop	November 19
TC Action	November 20
Council Adoption	December 4

Link for Public Comment: <https://nfrmpo.org/public-comment/>

4

Questions?



Becky Karasko, AICP

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If you need any accommodations to access this document's content, please email staff@nfrmpo.org or call (970) 800-9560. You can expect a response within 3 business days.

EXECUTIVE SUMMARY of the
North Front Range Transportation and Air Quality Planning Council
October 2, 2025

AGENDA MODIFICATIONS

Canonico **moved** to APPROVE THE AGENDA MODIFICATIONS. The motion was **seconded** by Jenkins and **passed** unanimously.

CONSENT AGENDA

Canonico **moved** to APPROVE THE CONSENT AGENDA. The motion was **seconded** by Jenkins and **passed** unanimously.

AIR QUALITY AGENDA

NFRMPO Air Quality Program Updates –Wojtach noted the new health-based benchmarks that were approved by the Air Quality Control Council (AQCC). She also noted the AQCC’s Ozone SIP will have a rulemaking hearing in November. She reminded Planning Council that comments on that rulemaking hearing are due on November 4th. She noted the Region Air Quality Council (RAQC) rescheduled their ozone forum from July to October 30th, which will discuss source apportionment monitor findings in non-attainment areas. Lastly, she provided an overview of H.R. 4218 and its impact on the Clean Air Act.

Regional Air Quality Council (RAQC) – Stephens noted there is an updated blueprint which the RAQC is discussing.

Nonattainment Area Air Pollution Mitigation Enterprise (NAAPME) – Stephens noted there was no September meeting.

METROPOLITAN PLANNING ORGANIZATION (MPO) AGENDA

REPORTS:

Report of the Chair – No report was provided.

Executive Director Report –Relford noted the NFRMPO is in the process of switching its financial software. She also noted the NFRMPO is in the process of transferring the servers to the cloud. She noted the NFRMPO successfully submitted its 2024 Audit to the Clearing House. She noted continued work on the 2026 and 2027 NFRMPO budgets. She noted she has been appointed to the Region Planning Roundtable Commission as a regional representative on behalf of the NFRMPO. Lastly, she noted ongoing Freight Planning efforts and asked Councilmembers and TAC representatives to email the contact information of freight stakeholders to Stockburger so they could be provided with the NFRMPO’s 2026 Freight Northern Colorado Stakeholder Survey.

ACTION ITEMS:

FY2025 TIP Delay Review– Stockburger noted the results of the FY2025 TIP Delay Review. There were 26 projects which were eligible for delay review for FY2025. Three projects were up for a 3rd Delay, one project was up for a 2nd Delay, six projects were up for a 1st Delay, and 16 projects were not delayed further. TAC approved all 1st

Delays at their September meeting. Communities with 3rd Delays provided presentations to the Planning Council about the location of their projects, why they are delayed, and how certain they are of the Ad Date.

Jenkins **moved** to APPROVE THE 2nd AND 3rd DELAYS. The motion was **seconded** by Karspeck and **passed** unanimously.

VanGO™ Extenuating Circumstances Policy – Relford noted the purpose of this amendment policy is to provide Program flexibility for waiving or reducing fares for eligible essential employees facing unique or challenging circumstances beyond that create a barrier to accessing their vanpool. Examples of when it could be needed may include, but are not limited to, government shutdowns, natural disasters, public health emergencies, or any other types of emergency responses. Previously, VanGO™ only had a policy in place for public health emergencies, such as COVID. This policy amendment sets a clearer definition of what happens to finances and routes associated with the Vango™ program in the case of an extenuating emergency situation.

Jenkins **moved** to APPROVE THE VanGO™ EXTENUATING CIRCUMSTANCES POLICY. The motion was **seconded** by Karspeck and **passed** unanimously.

PRESENTATION ITEM:

VanGO™ Program Update – Armstrong provided an update on VanGO™ Program operating in the region. He provided an overview of what vanpooling is, how the finances work for the program, and how the program is beneficial to the region. Armstrong walked through various statistics of the program comparing 2023, the last time he presented to Council, to 2025, including number of active routes, number of active participants, occupancy rate, and number of new routes added per year. Armstrong noted information about the VanGO™ fleet, including types of vehicles used and how the vehicles are maintained. Armstrong noted the annual survey, the VanGO™ Safety Newsletter, and upcoming upgrades to the VanGO™ App and Online Portal.

DISCUSSION ITEMS:

NFRMPO Executive Director Policies – Relford discussed NFRMPO Executive Director Policy 5.6, which limits contract signing to \$100,000. Relford brings up this policy because of CPG contract signing and noted the amounts that are being signed have already been approved through the NFRMPO budget process. After discussion, the consensus was that the policies are okay to be changed at a future Council meeting. Relford will bring back draft language at the November Council meeting.

Draft GHG Transportation Report – Karasko discussed the Draft GHG Transportation Report. She discussed the reasons for requiring a new report and the process this report needs to go through to get approved. She discussed the strategies the region has used to be in compliance with GHG Standards. She noted that the region is passing the GHG standards for all five years that the NFRMPO examines. Lastly, she noted next steps, which include sending copies of the report to CDPHE (APCD), CDOT, and posting them on our website for public review.

Weld County Mobility Committee (WCMC) – September MINUTES

September 30th, 2025, 1:00 p.m. to 3:30 p.m.

Hybrid Location:

The United Way of Weld County, 814 9th Street, Greeley, CO 80631

Call Meeting to Order, Welcome, and Overview of Agenda

Introductions & Icebreaker

Both virtual and in-person attendees introduced themselves and their organizations.

- Jill Matlock, Weld County Health Department
- Jay Dinges, UNC Campus Services
- Shawn Croissant, Envision
- Trevor Trepanier, City of Greeley Transit Specialist
- Adriana Torres, Via Mobility Services
- Robin Upton, WAND
- Steve Teets, WAND
- Hannah Feldmann, City of Greeley Transportation Planner
- Ty Lamb, United Way

NFRMPO staff: Aaron Hull and Elizabeth Relford

Public Comment

There was no public comment.

Approval of the June Meeting Minutes

Ty Lamb moved to approve the June 24, 2025, meeting minutes, which Adriana Torres seconded; the motion passed unanimously.

Co-Chair Elections

Aaron Hull explained that Nicole Seward had to step down from being a Co-Chair. Aaron explained the responsibilities of the Co-Chair position to the group. Hull opened it up to the group for discussions and nominations. He also mentioned that you can email him with nominations. Steve Teets mentioned nominating Robin Blakely with 60+Ride as a co-chair.



Virtual Meeting

Aaron will reach out to see if she is interested in this position. Hanna will also consider Trevor Trepanier as a potential nominee for the position.

Aaron will send out an email with the co-chair description, bylaws, and request nominations by Oct. 31st and will bring it back for the Committee's consideration at the December meeting.

RideNoCo Update

Hull provided an update on the call center, sharing year-to-date call and website visit statistics, as well as discussing upcoming outreach events. Year-to-date, there have been 260 calls and 4,668 website visits.

The data indicates that more people are calling from Larimer County than from Weld County. Hanna offered to share resource contact information to help RideNoCo make more connections in Greeley, thereby facilitating more outreach to Weld County residents. Aaron will provide the year-to-year statistic comparison between the counties for the next meeting.

Steve also recommended sharing a RideNoCo pamphlet with libraries, bus facilities, social services, and community senior centers.

NFRMPO staff have done 35 event presentations so far this year.

Steve had a question about whether a representative from the City of Evans would be willing to participate in the Mobility Committee. Aaron will follow up and reach out to Evans.

Presentations

Greeley Mobility Development Plan

Hanna Feldmann, City of Greeley Transportation Planner, presented the Mobility Development Plan to the Mobility Committee. The Greeley City Council adopted the Plan in May of 2025.

Routes 1 and 5 are focusing on Bus Rapid Transit (BRT).

The short-term priority is to provide a shuttle service to UC Greeley Hospital.

She noted the Greeley bus route system has not been updated since 2001, so this plan recommends significant route updates.

Additionally, Greeley aims to continue collaborating with Evans to develop a future mobility hub in their community, located near Envision and the Community Center.



Virtual Meeting

GET is also conducting a rebranding effort to capture better the expanded mobility services, including the opportunity to participate in naming the new US 34 Transit Service as part of this effort.

Steve invited Hanna to attend the next Citizen Bus Advisory Group and WAND meetings to share her presentation with both groups and bring hard copies of surveys to gather as much resident and user feedback as possible.

Steve then asked Hanna to define the term micromobility transit. She stated that it refers to scooters, bicycles, and on-demand transit services that help connect users to shared bus stops, such as bike lanes.

Steve also wanted to know what the first and last mile transit definition means. Feldmann explained it, referring to the distance from your house to the bus stop, which equals your first mile. The last mile refers to the distance between where the stop ends and your destination, such as your workplace or employment location. Greeley's Plan outlines the various strategies available to achieve both scenarios. More specifically, Greeley's Plan outlines how the city is connecting a neighborhood to the community hub, and ultimately to a regional hub.

Discussion Items

Case Study

Due to the meeting time running short, the case study was not presented and will be moved to the next meeting.

Wrap-Up & Member Updates

Greeley Evans Transit News & Updates

Trevor updated the group on GET, completing the Ride 3 program, and finalizing grants. They are in the process of transferring CMAQ funds back to CDOT. Also, they are evaluating if there are other grant opportunities to leverage additional funding for a new operations center to accommodate GET's expanding fleet.

WCMC Member Updates & Roundtable

Aaron is completing TMO Guidebook updates for the next TAC meeting in October and Council in November.

Aaron also mentioned the CASTA Conference and will compile a slide summarizing the conference highlights for the next meeting.



Virtual Meeting

Steve had an update on the changes in Medicare and Medicaid for next year and wants to ensure people are aware of the changes.

Ty Lamb said he hosted a Collective Impact Community Listening Event on July 31st from 1:00 to 3:00 pm and will be hosting the final public meeting at Farr Library in October.

Public Comment

There was no public comment.

Agenda Suggestions

At the next Committee meeting, Steve would like to discuss the Bylaws, specifically the section regarding meeting locations and frequency.

Meeting Adjournment

Steve Teets made a motion to adjourn the meeting, seconded by Torres. Motion carried unanimously.

Upcoming Meetings:

1. Larimer County Mobility Committee: October 28, 2025*
2. Northern Colorado Mobility Committee: November 4, 2025
3. Weld County Mobility Committee: December 16, 2025*

*Please note:

- The WCMC and LCMC have changed to **hybrid** meetings and will have an option to meet in-person as well as virtually. Locations for the hybrid meetings will be at the following:
 - The WCMC will be held at The United Way of Weld County office at 814 9th Street, Greeley, CO 80631.
 - The LCMC will be held at the Loveland Youth Campus at 2366 E 1st St, Loveland, CO 80537.



MEMORANDUM

To: NFRMPO Technical Advisory Committee
From: Jonathan Stockburger
Date: October 15, 2025
Re: Report – Q3 2025 TIP Modifications

Summary

In the third quarter of 2025 (July - September), the NFRMPO processed three Administrative Modifications to the FY2024-2027 Transportation Improvement Program (TIP). The modifications are listed and linked below.

- July 2025 TIP Modification - <https://nfrmpo.org/wp-content/uploads/2025-m7-tip-modification.pdf>
- August 2025 TIP Modification - <https://nfrmpo.org/wp-content/uploads/2025-m8-tip-modification.pdf>
- September 2025 TIP Modification - <https://nfrmpo.org/wp-content/uploads/2025-m9-tip-modification.pdf>

The most recent TIP tables including all Policy Amendments and Administrative Modifications can be found at www.nfrmpo.org/tip.

For any questions about the Q3 TIP Modifications please contact Jonathan Stockburger at jstockburger@nfrmpo.org.

Recommendation

None

Attachments

- None

Subject: Air Quality Related Activities Report to NFRMPO Council

Date: 9/23/25

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 October 2, 2025 meeting.

Summary:

In September 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. The RAQC shared a September 5 version of their Blueprint charting a course to developing additional control strategies that may 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.

There continue to be two funding opportunities available for the NFRMPO Council to consider, at the Clean Fleet Enterprise and Colorado Air Quality Enterprise discussed in Other Air Quality Activities section below.

Air Quality Activities:

AQCC Activities:

In September the AQCC adopted health-based benchmarks for the five priority air toxic contaminants (PTACs), intending that these be used for screening purposes.¹ Adverse health effects are not expected under these benchmarks. However, where benchmarks are exceeded, more stringent actions may be necessary to better understand potential health risks. Colorado PTACS include: formaldehyde, benzene, hexavalent chromium compounds, ethylene oxide and hydrogen sulfide. This rulemaking will be followed by additional rulemaking(s), ultimately setting emission control regulations for each PTAC.²

In a continued hearing, the AQCC also considered technical corrections to their Building Benchmarking and Performance Standards rule, consistent with statutory revisions that came out of the 2025 Legislative Session. The AQCC also set a 2026 rulemaking hearing on revisions to their oil and gas rules. Specifically, the AQCC will consider revisions to their rules impacted by EPA's Emission Guidelines to Subpart OOOOc, relating to oil and gas operations.

On September 30, 2025, parties to the AQCC's Ozone SIP and Associated Regulations rulemaking that intend to put forth an alternative proposal compared to the APCD's proposal

¹¹ See CDPHE's Press Release, "Commission approves health benchmarks for five toxic air pollutants," September 19, 2025, here: <https://cdphe.colorado.gov/press-release/commission-approves-health-benchmarks-for-five-toxic-air-pollutants>

² See CDPHE's Priority Toxic Air Contaminants webpage, for more details, here: <https://cdphe.colorado.gov/air-toxics/priority-toxic-air-contaminants>

must file that alternative proposal and supporting documentation. TRE continues to track activities related to that 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

Key milestones for this Ozone SIP rulemaking hearing, are as follows:

IMPORTANT DATES AND DEADLINES:

PROCESS DESCRIPTION	DUE DATE & TIME
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.

TRE continues to track activities related to that rulemaking hearing.

APCD Activities

The APCD continues to hold public discussions on a concept to further reduce methane emissions from oil and gas operations, in preparation for a related AQCC rulemaking hearing scheduled for February 2026, and discussions on a public needs assessment for PTACs.³

RAQC Activities

The RAQC staff continue to develop their Blueprint of control strategies intended to reduce both ozone precursor pollutants and ozone levels in the Denver Metropolitan North Front Range Area. Comments on the RAQC's Blueprint, including the latest version dated September 5, 2025 were requested by September 19, 2025. This Blueprint is anticipated to continue to evolve throughout 2026, and the process for doing so will be incorporated in this next October 2025 version of the Blueprint. Staff explained how several strategies gather information and to inform a related future version of that strategy in the following Buckets. One example includes data reporting in early phases of regulating indirect sources, transitioning to compiling of best management practices in Emission Reduction Plans, and finally establishing those key practices as control requirements in the later phase of this effort. Listed control strategies include voluntary and regulatory approaches, include data gathering and establish control requirements, touching upon industry, transportation, commercial cooking, lawn maintenance, consumer products, and more.

The RAQC staff also held Control Strategy meetings discussing next steps in developing strategies specific to indirect sources and the evolution of the Blueprint. Staff also began referencing a new 2026 report on public health impact in the Denver Metropolitan North Front Range Area.

The postponed Summer 2025 Ozone Forum has been rescheduled to October 30, 2025.⁴ During this forum, 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) are anticipated to be shared. Again, RAQC staff have indicated that they anticipate that the nonattainment area will still be unable to model attainment with the 70 ppb NAAQS.

Further, this 2025 Ozone Forum is also anticipated to discuss more in depth the use of the "Direct Decoupled Method" for ozone modeling. – a more efficient way of evaluating multiple changes individually or in combination, to derive the sensitivity of the modeled ozone values to control strategies – that reduces the burden and cost of attainment demonstration modeling.

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 9/21/25, there are no new high 8 hour averages

³ See APCD's Public Participation Opportunities webpage, here: <https://cdphe.colorado.gov/APCD/Outreach>

⁴ See RAQC's Fall 2025 Ozone Attainment Forum webpage, here: <https://raqc.org/event/fall-2025-ozone-attainment-forum/>

for any monitors in Larimer or Weld County. The Fort Collins West, Greeley and Timnath monitors do have 4th max daily 8-hour averages of 72, 71 and 73 ppb, respectively, above the 70 ppb standard.⁵ 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 reviewed the H.R. 4218, Clean Air and Economic Advancement Reform (CLEAR) Act, introduced in the 119th Congress in June 2025 to the House of Representatives by Representative Carter (R- GA).⁶ This bill as introduced revises the Clean Air Act (CAA) relating to National Ambient Air Quality Standards, SIP and Federal Implementation Plan (FIP) requirements (including for Contingency Measures, consideration of economic feasibility and application of sanctions), Exceptional Events, and the Clean Air Scientific Advisory Committee (CASAC). Specifically, the bill proposes to change the timing of National Ambient Air Quality Standards reviews from a five year cycle to a ten year cycle, CASAC broad representation from throughout the nation as the group who makes recommendation on the setting of the NAAQS, as well as allowing for consideration of attainability when setting the NAAQS. The bill proposes to allow air agencies a year to respond to SIP incompleteness determinations and deficiency findings before implementing a FIP. There are considerations for development and implementation of Contingency Measures in Extreme nonattainment areas and sanctions where emissions are beyond control. Exceptional Events are redefined and provide for treatment of data related to meteorological events, natural and some human-caused emissions (i.e. wildfire mitigation activities). The bill further directs EPA to update their guidance for addressing Exceptional Events within 18 months, enlists EPA to conduct regional analyses when requested by two or more states, as well as providing public access to the submittal, review and actions approving or disapproving those Exceptional Event submittals.

EPA Region 8 Administrator Western and staff met with NFRMPO Executive Director and the Pikes Peak Area Council of Governments discussing challenges in meeting ozone NAAQS, and the broader intermountain west region's experiencing similar challenges. Specifically, both MPOs: 1) introduced the Intermountain West Metropolitan Planning Organization Air Quality (IMW MPO AQ) Workgroup; 2) solicited EPA support to partner with IMW MPO AQ Workgroup and intermountain west states to study the disconnect between ozone levels and reductions in precursor pollutants in the intermountain west; 3) sought EPA commitment to jointly explore options for areas subject to high background levels and other non-locally controllable pollution contributions that may not be able to meet the ozone NAAQS simply by reducing their own man-made pollution to avoid nonattainment designations and/or downgrades over time; and 4) requested EPA agreement to explore holding a 2026 field hearing (building on the EPA's 2016 Background Ozone Workshop, or intermountain west centric discussion on the state of the science and current studies, modeling updates & improvements, emission inventories & data gaps).

⁵ See RAQC's Current 8-Hour Ozone Summary, "Ozone Summary through September 21st, 2025", downloaded 9/22/25 here: <https://raqc.org/current-8-hour-ozone-summary/>

⁶ See CONGRESS.GOV website the 119th Congress



Also, Colorado's Transportation Legislative Review Committee (TLRC) met in September, receiving briefings on a variety of topics, including air quality and transportation, and bill draft requests. The TLRC narrowed the list of bill drafts to be further scoped and discussed at the October 21, 2025 TLRC meeting, none of which appeared to directly focus on air quality.

TRE continues to track federal air quality actions. EPA announced their intent to focus their reconsideration of the 2025 State Implementation Plan Submittal Deadlines and Implementation Requirements for Reclassified Nonattainment Areas Under the Ozone National Ambient Air Quality Standards (originally announced on June 3, 2025) on what they call "leftover" SIP requirements, or "unresolved requirements applicable to former classification[s]" where EPA has not yet approved those SIP elements.⁷ The EPA proposed reconsideration of their Greenhouse Gas Reporting Program, as well as 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.^{8,9} EPA held a public hearing regarding proposed revisions to existing air quality regulations for oil and natural gas equipment and operations on September 5, 2025 and comments will be accepted through October 2, 2025.¹⁰

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.¹¹ 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 and Emerging Technologies," which is broad and open-ended.¹² 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.

⁷ See EPA's "Ozone Implementation Regulatory Actions" webpage, here: <https://www.epa.gov/ground-level-ozone-pollution/ozone-implementation-regulatory-actions#:~:text=Final%20State%20Implementation%20Plan%20Submittal,coming%20months%2C%20soliciting%20public%20comments>.

⁸ See EPA's proposed "Reconsideration of the Greenhouse Gas Reporting Program," September 16, 2025 (90 Fed Reg 44591); downloaded 9/23/25 here: <https://www.govinfo.gov/content/pkg/FR-2025-09-16/pdf/2025-17923.pdf>

⁹ 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>

¹⁰ 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>

¹¹ See CDPHE's "Clean Fleet Vehicle and Technology program" webpage for details: <https://cdphe.colorado.gov/clean-fleet-vehicle-and-technology-program>

¹² 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>



Meetings TRE Plans to Attend (or screen)

- 10/2/25 NFRMPO Council Meeting
- 10/3/25 RAQC Board Meeting
- 10/15/25 RAQC Control Strategy Committee Meeting
- 10/15-17/25 AQCC Meeting
- 10/21/25 TLRC Meeting
- 10/23/25 RAQC Indirect Sources Technical Workgroup Meeting

Other Anticipated Air Quality Activities

- EPA's Exceptional Events Guidance
- EPA's Ozone NAAQS Reconsideration
- EPA's Reconsideration of the PM2.5 NAAQS

Recommendations:

- NFRMPO should continue to track the TLRC bill drafting activities
- 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