



NFRMPO Technical Advisory Committee (TAC)

Hybrid Meeting Agenda

December 17, 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 November 19, 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

Consent Agenda

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
6	Foothills Transit Station MMOF Match Relief Request	Joshua Ma, Transfort	10	1:25

Action Items

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
7	2026 TAC Chair and Vice Chair Elections	Becky Karasko	-	1:30
8	2022-2026 NFRMPO Safety Performance Measures Targets	Mykayla Graalum	12	1:35



Presentations

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
9	Syphon Overpass Project	Dana Hornkohl, Fort Collins	-	1:40
10	US34 and Taft Intersection Project	Nicole Hahn, Loveland	Handout	1:45
11	Regional Wayfinding Project	Wade Willis, Windsor	Handout	2:00

Discussion Item

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
12	US34 Transit Study	Becky Karasko Ian Chase, HDR	Handout	2:15

Outside Partner Reports

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
14	NoCo Bike & Ped Collaborative	Written Report	-	-
15	Regional Transit Agencies	Verbal Report	-	-
16	Mobility Updates	Tanya Trujillo-Martinez	15	2:45

Reports

Agenda Item Number	Agenda Item and Item Description	Presenter	Page Number	Time
17	December Planning Council Meeting Summary Draft	Written Report	22	-
18	Mobility Committee Updates	Written Report	24	-
19	NFRMPO Air Quality Program Updates	Written Report	29	-
20	Roundtable	All	-	2:50

Meeting Wrap Up:

- Next Month's Agenda Topic Suggestions
- Next NFRMPO TAC Meeting: January 21, 2026

MEETING MINUTES of the TECHNICAL ADVISORY COMMITTEE (TAC)

North Front Range Transportation and Air Quality Planning Council

Hybrid Meeting

November 19, 2025

1:02 p.m. – 2:40 p.m.

TAC Members Present

Nicole Hahn, Chair – Loveland
Evan Pinkham, Vice Chair – Weld County
Emma Belmont – FTA
Aaron Bustow – FHWA
Tim Hoos – Johnstown
Dana Hornkohl – Fort Collins
Kim Koivuniemi – Timnath
Victoria Leonhardt – Greeley
Tom Moore – RAQC
Scott Pearson – Windsor
Eric Tracy – Larimer County

NFRMPO Staff:

Aaron Hull
Becky Karasko
Mykayla Graalum
Elizabeth Relford
Jerome Rouser
Jonathan Stockburger
Tahjiba Tarannum
Tanya Trujillo-Martinez

TAC Members Absent:

Josie Thomas – CDOT
Brendan Cicione – CDPHE-APCD
Tawn Hillenbrand – Berthoud
Town of Garden City
Kevin Koelbel – Milliken
Town of LaSalle
Wesley LaVanchy – Eaton
Shani Porter – Severance

In Attendance:

Carisa Clinton – Fort Collins
AnnaRose Cunningham – Loveland
Candice Folkers – COLT
Caleb Feaver – Fox Tuttle Transportation Group
Omar Herrera – Windsor
Rena Jording – GET
Tamara Keefe – FHU
Joshua Ma – Transfort
Annareli Morales – Weld County
Desiree Moore – Drive Clean Colorado
Drew Pearson – Wilson & CO
Kyra Reumann-Moore - RAQC
Luke Seeber – Berthoud
Spencer Smith – CoFC
Spencer York – CDOT

Call to Order

Chair Hahn called the meeting to order at 1:02 p.m.

Public Comment

There was no public comment.

APPROVAL OF THE OCTOBER 15, 2025 TAC MINUTES

Hornkohl moved to approve the October 15, 2025 TAC Minutes. Pinkham seconded the motion, which was approved unanimously.

Air Quality Agenda

Regional Air Quality Updates

Moore noted updates for the November 7th Control Strategy Blueprint. These include updating primary recommendations, adding the Strategy Planning Analysis Summary Table, references to modeling tools and information, graphic showing efforts guiding the Blueprint, and various supporting documents. Moore noted the primary recommendations. The first Recommendation includes achieving attainment of the 70 ppb National Ambient Air Quality Standard for ozone in the 2030-32 period, by proposing a package of emissions reductions policies for implementation in 2030. The second recommendation includes a summary of the Blueprint presented at the AQCC Rulemaking Meeting on November 20-21, 2025. The third Recommendation includes analyzing the results of the 2025 Blueprint and seeing how it can be updated in 2026. The fourth Recommendation includes remaining in contact with the AQCC over the next five years for Blueprint updates and implementations.

Moore noted the 2026 Blueprint Actions following the fall 2025 endorsement. Quarter 1 includes collaborating with the AQCC, applying technical modeling tools, and beginning efforts for the Health and Costs of Current Ozone Impacts white paper and scope analysis of Fall 2025 strategies. Quarter 2 includes continued work on the collaborative evaluation process and completion of the Health Burdens white paper. Quarter 3 includes completing the strategy analyses, refining and augmenting strategy descriptions, and beginning to draft and review cycle for Fall 2026 Blueprint.

Moore noted the Blueprint Endorsement language was approved as a RAQC Board resolution. He also noted the Control Strategy Committee's next steps. These next steps include meetings for the Air Quality Control Commission meeting on November 19-21, 2025, the RAQC Source Apportionment and DDM Dashboards Forum on December 12th, and future Control Strategy Committee meetings to come in 2026.

APCD Updates

Karasko noted the hearings from two APCD meetings. The first was on October 15-17, 2025. This meeting included an adjudicatory hearing regarding asbestos related noncompliance issues for Edge Environmental LLC, revisions to Regulation Number 6 Part A, and revisions to Regulation Number 8, Parts A and E. The next hearing meeting will be on November 19-21, 2025. This meeting will include considering proposed elements to Colorado's State Implementation Plans (SIP) under the 2008 and 2015 ozone National Ambient Air Quality Standards (NAAQS) and revisions to associated regulations including Regulation Number 3, Regulation Number 7, Regulation Number 11, Regulation Number 25, Regulation Number 26 and the Air Quality Standards, Designations and Emission Budgets.

Metropolitan Planning Organization Agenda

Consent Agenda

Hornkohl moved to approve the Consent Agenda. Tracy seconded the motion, which was approved unanimously.

Action Items

TMO Call for Projects

Trujillo-Martinez provided the background and timeline for the TMO Call for Projects. Funding for this Call for Projects is sourced from the Carbon Reduction Program (CRP). The NFRMPO Planning Council has set aside \$400,000 in CRP funds between FY24 and FY27 for TMO Incubator projects, with a 17.21 percent local match requirement. She asked for TAC approval to open the Call for Projects on December 5 following Planning Council approval at their December meeting.

Hornkohl moved to recommend the Planning Council approve the TMO Call for Projects. Leonhardt seconded the motion, which was approved unanimously.

Discussion Items

Transfort Match Relief Request - MMOF

Joshua Ma, City of Fort Collins, discussed Transfort's request for local match relief on previously and newly awarded MMOF funding after the NFRMPO MMOF Reconciliation for the project Foothills Transit Station and Roundabout. Transfort is asking for the local match rate to be reduced from 50 percent to 25 percent. Ma noted the MMOF grant amount will stay the same. He noted the reason for this request is due to the majority of the project being within Larimer County, which only uses an adopted 25 percent local match rate for MMOF projects compared to Fort Collins' 50 percent local match rate. Ma also noted City budget cuts, declining sales tax revenue, and rising operational costs all putting a strain on local funding are other reasons cited for the request.

Hahn asked for clarification on who owns the land on the east side of the presented map. Ma responded it is leased through Colorado State University for their West Campus. Hahn asked for additional clarification on whether the MMOF funding amount is changing. Ma responded the MMOF funding remains the same and it is being used by this project to satisfy the match rate for the federal RAISE grant. Leonhardt asked if the scope of the project would change. Ma responded it would not. Hahn noted this also has to be a Planning Council discussion, so the earliest it could be approved is January. Karasko added this request also has to go to the Transportation Commission for their approval following Planning Council's approval.

2022 – 2026 NFRMPO Targets for Safety Performance Measures

Graalum provided an update to the 2022 – 2026 NFRMPO Targets for Safety Performance Measures. She started by comparing trends at the statewide level and NFRMPO level for fatalities and serious injuries. She noted that statewide fatalities have been trending down the last two years, however NFRMPO fatalities have been trending upwards for the last three years. She noted both the statewide and North Front Range region have had a downward trend for the last year involving serious injuries. Non-motorized injuries have been trending downward statewide for the last year, while those numbers have been trending upwards for the last two years in the North Front Range region. She also noted the most prominent causes of fatalities, serious injuries, and non-motorized fatalities and serious injuries in the region.

Hornkohl asked for clarification on why motorized and non-motorized bicycles are reported in the same category. Graalum responded the information received from CDOT has no category noting whether or not the bicycle is motorized. D. Pearson asked if scooters and other mobility devices are included in the non-motorized category. Graalum responded that she is unsure.

Graalum noted a chart showed the months where fatality and serious injuries crashes occur most often. Fatalities are most common in October and June, serious injuries are most common in September and June, and non-motorized crashes are most common in October and November.

Graalum walked through the safety target options for the region, which include either adopting the targets set by CDOT or creating regionally specific targets. These targets are set on a five-year rolling average and must be data driven. The safety targets include number of fatalities, rate of fatalities per 100 million vehicle miles traveled (VMT), number of serious injuries, rate of serious injuries per 100 million VMT, and the number of non-motorized fatalities and injuries. Graalum noted the NFRMPO had used the statewide targets through 2023 but has used regionally specific targets the previous two years. She noted that none of the regional targets set in the 2020 to 2024 period were met. She noted the methodologies that other Colorado MPOs are using to set their regional safety targets. She also noted the various safety plans adopted by local communities in the NFRMPO region and noted that two of the local communities will start work on their safety plans soon. She discussed the differences between statewide and regional safety targets that could be adopted. She noted the safety performance measures for fatalities and fatality rate for the statewide targets decreased from last year's targets while the serious injuries and serious injury rate for the regional targets decreased from last year's targets. She noted forecasts for 2025 and 2026 fatalities, serious injuries, and non-motorized fatalities and serious injuries compared to a yearly 1% reduction in fatalities. She ended by noting the timelines for setting safety targets before they are due to CDOT on February 26, 2026.

D. Pearson noted that CDOT changed their serious injury classification. He recommended looking five years into the past instead of ten to get a better picture of what the serious injury forecast will look like. Graalum noted there are only four years of data to go from after 2021. Hornkohl asked if communities developing safety action plans are planning to adopt vision zero strategies. Hahn noted Loveland currently has a proclamation to reduce traffic deaths by 20% by 2035. Hahn noted the previous Safety Action Plan did not meet all of the Safe Streets for All criteria because there was previously no commitment to a date to get to zero traffic deaths. Leonhardt noted she likes the way DRCOG structured their safety goals. Karasko noted the NFRMPO cannot do their safety goals in the same way since they do not have a set regional date to achieve vision zero. Leonhardt asked how DRCOG calculates their reductions. Graalum responded that they do a number reduction instead of a percentage reduction. She also noted that there was discussion during the 2020 MPO resolution to do something aligned with vision zero but it did not go past the discussion phase. D. Pearson recommended stacking the fatalities and serious injuries charts due to the hypothetical of fewer fatalities but increased serious injuries being considered an improvement. Hahn noted she prefers the regional safety performance measures to the statewide ones, also noting that she prefers more ambitious goals. Relford asked how the NFRMPO can help assist communities with achieving their safety goals. Hahn and Cunningham responded that providing information on which regional projects are making a positive change with safety would be beneficial and comparing that to the safety benefits that were mentioned in the project grant application for MPO funded projects. D. Pearson asked about how safety is being promoted by the MPO. Various people noted that various emergency services and communities make road-safety-related social media posts. Leonhardt noted the need for more safety education from the MPO and all agencies. TAC decided it would be beneficial to hear the Planning Council's perspective on the safety measures before the TAC moves to adopt one of the safety performance measure options. Graalum ended the conversation by noting her last name change from Marek.

Public Involvement Plan (PIP) Kickoff

Stockburger discussed the kickoff to the PIP, which is set to be adopted in 2026. He noted the purpose of the PIP and the NFRMPO goals for engaging the public and stakeholders. Stockburger noted the current involvement strategies that the NFRMPO uses, which include social media, outreach events, the website, the newsletter, surveys, interactive mapping, plan-specific outreach strategies, GIS Open Data, contact databases, contact forms, consistent graphics and branding, and hybrid meetings throughout region. He noted what will be new with this plan, which includes public vs stakeholder engagement, outreach event types, information on hosting a public meeting, GIS Open Data, contact forms, accessibility information, NFRMPO graphics and branding, contact databases, and an outreach locations map. He noted what will be updated from the previous PIP, which includes updated social media information, updated federal legislation, updated maps, updated outreach information, and how the NFRMPO defines outreach success. He walked through the questions that will be asked on the NFRMPO PIP Survey to try to gauge public feedback on how they want to be reached and how familiar they are with the NFRMPO. He noted the active NFRMPO social media platforms. He also noted updated NFRMPO Outreach Events strategies, which include attending more farmer's market type events, attending more university student events, attending more events year-round, and discontinuing multi-day events. Stockburger ended by providing a map of every outreach event the NFRMPO did in 2025.

Hahn noted she will send a copy of Loveland's AI Policy to the NFRMPO. Karasko asked if reviving the MPO 101 video series would be beneficial. Hahn responded it would be helpful. Rouser noted a video series idea of exploring trails in the region while on a bicycle. D. Pearson asked how children are defined in the outreach process. Karasko responded that it refers to anyone under the age of 17. D. Pearson noted his company does outreach at high schools when working on community plans. Cunningham noted Loveland has an upcoming Projects Fair that the NFRMPO will be invited to. She also noted Loveland works with the Parks and Rec Department to provide children with entertainment at outreach events. Karasko noted the NFRMPO is considering hosting a regional projects fair, but there are no official plans yet. Hornkohl noted he can put the NFRMPO in touch with the transportation fair planner for Fort Collins. He noted it would be helpful to know when the NFRMPO makes social media posts so he can notify the people in charge of the Fort Collins' social media or for the NFRMPO to be in direct contact with each community's social media team. Stockburger responded that he would reach out to each community to gather contacts for their social media teams. Leonhardt noted success with advertising posts on social media. She also noted they occasionally go to classes to talk about planning with interested students. She also noted that people are feeling over-surveyed. Hornkohl noted online outreach strategies from the most recent NACTO Conference.

Outside Partner Reports

NoCo Bike and Ped Collaborative

Rouser noted an in-person event at the Milliken Athletic Center. The focus of the event was small community bicycle and pedestrian planning. He noted the various strategies discussed to make processes easier for smaller communities. They also held discussions around a few of the NFRMPO Active Transportation Corridors. He noted an off-site field trip to the Bobcat Mounds to look at where the South Platte River Trail (RATC #1) will go through.

Regional Transit Agencies

None.

Mobility Updates

Rouser noted the Ruby Bridges Walk to School Day event grant. The event was held on Friday, November 13. The event included activities such as writing poetry or other forms of artistic expression relating to transportation. NFRMPO staff will judge the top two submissions, and the winners will both receive a bicycle. He noted that food and a new bike rack was also provided. Trujillo-Martinez noted there will be a social media post showcasing the two winners.

Reports

October Planning Council Meeting Summary Draft

Written report provided.

Mobility Committee Updates

Written report provided.

NFRMPO Air Quality Program Updates

Written report provided.

Roundtable

Karasko noted a CMAQ flex request was processed for Greeley-Evans Transit for the US34 Buses. She also stated the Quadrennial Review for the NFRMPO will take place in 2026. She noted an RFP is out for the regional travel demand model. Proposals are due on December 12, 2025. Lastly, she noted she is requesting presentations and the December TAC meeting from anyone with a completed MPO-funded project.

Hornkohl noted he would be happy to present the Siphon Overpass at the next TAC meeting. He also noted the connection for the Power Trail and the Mail Creek Trail will be open in early December.

Leonhardt noted a public meeting later that day regarding the MERGE project.

Cunningham noted the FRP for the Front Range Passenger Rail Station Study has closed.

Rouser noted the due date for the SB 25-030 is December 31, 2025.

Tarannum noted the Household Data Survey has been received for the North Front Range. She noted she will be part of the scoring committee for the RFPs.

Stockburger reminded TAC members to take the NFRMPO Freight Stakeholder Survey. He also noted he will request ALOP information from local transit agencies soon.

Graalum noted she is looking for article ideas for the NFRMPO newsletter.

Pinkham noted Weld County has begun working on a Comprehensive Plan update.

Meeting Wrap-Up

Final Public Comment

There was no final public comment.

Next Month's Agenda Topic Suggestions

None.

Meeting adjourned at 2:40 p.m.

Meeting minutes submitted by: Jonathan Stockburger, NFRMPO Staff

The next meeting will be held at 1:00 p.m. on Wednesday, December 17, 2025, as a hybrid meeting.

MEMORANDUM

To: NFRMPO Technical Advisory Committee
From: Joshua Ma, Transfort
Date: December 17, 2025
Re: *CONSENT* Transfort Match Relief Request – MMOF

Objective

The City of Fort Collins - Transfort is requesting match relief on previously awarded and newly awarded MMOF funds for the Foothills Transit Station and Roundabout.

Summary

The purpose of this memo is to request match relief in the form of a reduced local match of 25% (instead of 50%) for the City's current Multimodal Transportation and Mitigation Options Fund (MMOF) grants. Citywide budget cuts, declining sales tax revenue, and rising operational costs have significantly constrained available local funding. An updated project cost estimate, expected by year-end, is anticipated to reflect higher total costs, and Fort Collins has not yet fully identified the local match under the previous estimate. Adjusting the match requirement to 25% will allow the City to keep this project moving forward while managing current financial pressures and maintaining capacity for other critical priorities.

Under the Local MMOF Program Guidelines, applicants such as Transfort may qualify to use the match rate of the county they serve and may request project-specific match reductions with support from the MPO/TPR and approval by the Transportation Commission. Because the entire transit station and the majority of the roundabout funded by this grant is located in Larimer County, which has an adopted match rate of 25%, we are requesting to use the county's match rate since over 90% of the project is located outside of City limits. This request is consistent with recent CDOT CTE decisions granting Fort Collins match relief under the same guidelines for the SB230 Formula Program and Capital Call (in progress). A favorable decision by the TAC on this request would also move the City closer to meeting its local match requirement for the federal RAISE grant, positioning the project to advance to construction more quickly.

Analysis

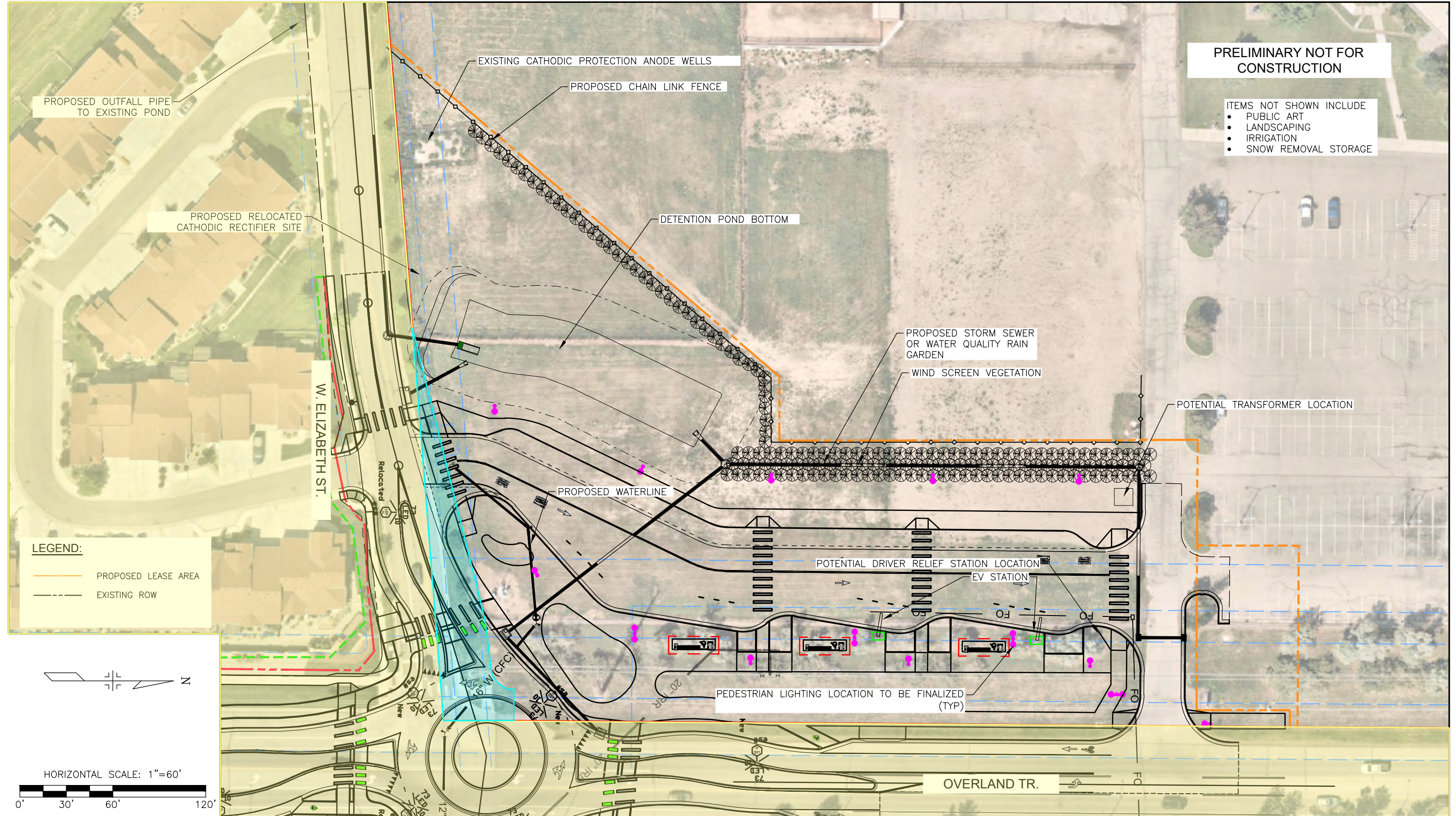
- **Advantages:** Approving the match relief request will allow this project to move forward under current financial pressures.
- **Disadvantages:** None noted.

Recommendation

Transfort requests TAC members recommend Planning Council approve the match relief request at their January 8, 2026 meeting.

Attachments

- [CDOT MMOF Local Program Guidebook](#)
- Foothills Transit Station Boundary Map



MEMORANDUM

To: NFRMPO Technical Advisory Committee

From: MyKayla Graalum

Date: December 17, 2025

Re: Action - 2022-2026 NFRMPO Targets for Safety Performance Measures

Objective

TAC recommend the adoption of regional safety performance measure targets using an ETS forecast equation for 2022-2026 to Planning Council.

Summary

Per federal requirements, the NFRMPO must set targets for five safety performance measures for the 2022-2026 period by February 27, 2026. CDOT set statewide targets for 2022-2026 in August 2025.

To set Targets, the NFRMPO can either:

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

The NFRMPO TAC and Planning Council have agreed that setting regional safety performance measure targets using an ETS forecast equation is preferred for the 2022-2026 targets. The proposed regional targets for the 2022-2026 period include:

- Number of Fatalities – **45**
- Rate of Fatalities per 100M Vehicle Miles Traveled (VMT) – **1.129**
- Number of Serious Injuries – **295**
- Rate of Serious Injuries per 100M VMT – **7.625**
- Number of Non-motorized Fatalities and Serious injuries – **50**

Analysis:

- Targets for the safety performance measures are set based on a rolling 5-year average.
- CDOT analyzed 10 years of historic crash data and used an exponential smoothing (ETS) analysis to forecast fatalities and serious injuries for 2025 and 2026. The 5-year average was calculated using actual fatality and serious injury numbers for 2022-2024 and the forecasted numbers for 2025-2026.
- NFRMPO Staff duplicated CDOT methodology using crash data for the region.
- The NFRMPO's targets for 2022-2026 will be included in future updates to the NFRMPO's Transportation Improvement Program (TIP) and Regional Transportation Plan (RTP).
- The CDOT targets for the National Performance Measures are not aspirational targets, such as those established in the 2020-2021 Strategic Transportation Safety Plan. While



CDOT and the NFRMPO are still endeavoring to move toward zero deaths and injuries, the federally required targets are data driven in accordance with the FHWA requirements for target setting.

- The NFRMPO has set safety performance measure targets by supporting CDOT's statewide targets from 2018-2023. All statewide Targets are presented in **Table 1**. From 2024-2025, the NFRMPO set its own regional targets instead of supporting the statewide targets. The 2024-2025 regional targets and the recommended 2026 regional targets are presented in **Table 2**.

Considerations

- Setting regionally specific targets provides a more accurate reflection of safety in the North Front Range.
- The NFRMPO has a Towards Zero Deaths policy and many communities with safety policies throughout the region.
- The NFRMPO does not have set funding for safety specific projects which would directly contribute to crash reductions.
- There is no financial penalty to the NFRMPO for not achieving or making significant progress toward Targets.
- The NFRMPO could be penalized administratively via Certification Reviews for not meeting Targets.
- The NFRMPO must adopt either to support all the statewide targets or adopt all the regionally specific targets.

Recommendation

NFRMPO Staff requests that TAC recommend the regional safety performance measure targets for 2022-2026 to Planning Council as presented in **Table 2**.

Attachments

- **Table 1:** Historical CDOT Safety Performance Measure Targets
- **Table 2:** Historical NFRMPO Safety Performance Measure Targets (Beginning with 2020 – 2024 Targets)



Table 1: Historical CDOT Safety Performance Measure Targets

Measure	2014-2018	2015-2019	2016-2020	2017-2021	2018-2022	2019-2023	2020-2024	2021-2025	2022-2026
Fatalities	610	644	618	603	597	668	716	740	734
Fatality Rate per 100M VMT	1.2	1.21	1.143	1.113	1.093	1.262	1.358	1.363	1.342
Serious Injuries	3,350	2,909	3,271	3,161	3,194	3,041	3,507	3,640	3,997
Serious Injury Rate per 100M VMT	6.79	5.575	6.075	5.828	5.846	5.794	6.528	6.701	7.276
Non-Motorized Fatalities and Serious Injuries	586	514	670	551	571	548	572	659	784

Table 2: Historical NFRMPO Safety Performance Measure Targets (Beginning with 2020 - 2024 Targets)

Measure	2020-2024	2021-2025	2022-2026: Preferred Option
Fatalities	39	36	45
Fatality Rate per 100M VMT	1.11	0.943	1.129
Serious Injuries	238	298	295
Serious Injury Rate per 100M VMT	6.73	7.671	7.625
Non-Motorized Fatalities and Serious Injuries	36	41	50

MEMORANDUM

To: NFRMPO Technical Advisory Committee

From: Aaron Hull, Mobility Planner

Date: December 17th, 2025

**Re: Final 2025 Coordinated Public Transit/Human Service
Transportation Plan (Coordinated Plan)**

Objective

To inform the Technical Advisory Committee of the approval and passing of the **2025 Coordinated Public Transit/Human Service Transportation Plan (Coordinated Plan)** by the NFRMPO Planning Council

Key Points

- To receive FTA \$5310 funding, the NFRMPO is required to update the **Coordinated Public Transit/Human Services Transportation Plan** every four years.
- The NFRMPO Planning Council adopted the previous **2021 Coordinated Plan** in December 2021.
- Since the **2021 Coordinated Plan** the NFRMPO has completed the following: the creation of the NFRMPO Mobility Management program, the creation of staff positions and time for the NFRMPO Mobility program, technical assistance, the management of three coordinating councils (mobility committees), the launch and optimization of *RideNoCo*, staff trainings, help to acquire wheelchair-accessible vehicles for partner agencies, expansion of Via Mobility Services to Weld County, outreach, help with the Larimer County Senior Transportation Implementation Plan, support the Dial-A-Taxi programs in Fort Collins and Loveland, help with vehicle replacement, and support of the ADA sidewalk program.
- The **2025 Coordinated Plan** was brought to the Planning Council in July 2025 for initial feedback during the outreach process.
- The NFRMPO Planning Council first discussed and read the **2025 Coordinated Plan** at the November 6, 2025, Planning Council meeting, then the NFRMPO Planning Council did the second reading and approved the **2025 Coordinated Plan** at the December 4, 2025, Planning Council meeting.

- The **2025 Coordinated Plan** emphasizes transportation issues, service overlaps, and gaps for older adults, people with disabilities, low-income individuals, and other underserved communities within the NFRMPO region, which includes the urban areas of Larimer and Weld counties, the rural portions of the NFRMPO, and outlines goals and strategies to address these identified gaps.
- The **2025 Coordinated Plan** was developed with input from the public through presentations at meetings, a public survey, attendance at local events, conversations with various stakeholders such as local transit agencies, service providers, human service agencies, the public, and others, as well as discussions with the Larimer and Weld County Mobility Committees and feedback from the NFRMPO TAC, the joint Northern Colorado Mobility Committees, and different regional stakeholders.
- The **2025 Coordinated Plan** heard from the input received during outreach that the following gaps in services are affecting mobility in our communities: new neighborhoods not being served by transportation, getting in between communities can be difficult, that rural areas need more support, temporary disabled individuals need support, the need for affordable transportation, that funding is limited, and there needs to be more awareness of already existing resources.
- Additionally, gaps in services from the *RideNoCo* call center that were incorporated into the **2025 Coordinated Plan** highlighted that last-minute transportation, exclusion from service areas, cost, and temporary disability were all issues raised.
- The **2025 Coordinated Plan** identified five strategies to help with addressing the identified gaps in service in the area, which were Coordination; Education, Outreach, and Communication; Collaboration; Infrastructure and Funding; and Non-Mobility Improvements.
- Some suggested ideas and strategies to help with the five strategies identified in the **2025 Coordinated Plan** that was heard from input from outreach and the different service providers in the area included the creation of a volunteer pool program, the creation of a volunteer medical chaperone program, the creation of an emergency fund for transportation, the expansion and optimization of the *RideNoCo* program, hosting earn-a-bike workshops, and the creation of a regional mass public transit and paratransit system.
- Comments received during the 30-day public comment period were incorporated into the draft **2025 Coordinated Plan**.
- The **2025 Coordinated Plan** can be downloaded at:
<https://nfrmpo.org/wp-content/uploads/Draft-2025-Coordinated-Plan.pdf>

Supporting Information

- The NFRMPO Mobility team, the Mobility Coordination Program, and the RideNoCo one-call/one-click center are funded through FTA \$5310 funds received from CDOT and sales tax dollars from the City of Fort Collins (exchanged for FTA \$5310 funds).
- The NFRMPO Mobility team and the Mobility Coordination Program bring together human service and transit agencies and staff from the NFRMPO to ensure residents of the region have efficient and coordinated mobility and access.
- Federal transit law requires that projects selected for funding under the FTA \$5310 Enhanced Mobility for Individuals and Individuals with Disabilities Program be "included in a locally developed, coordinated public transit-human services transportation plan."
- The Larimer and Weld County Mobility Committees and the joint Northern Colorado Mobility Committee have functioned as steering committees for the **2025 Coordinated Plan** and recommended approval to the Planning Council.

Advantages

- The **2025 Coordinated Plan** meets the requirements set out in federal guidance.
- The **2025 Coordinated Plan** builds support and partnerships already in existence.
- The **2025 Coordinated Plan** situates the region to receive additional funds to achieve the goals set out in the Plan.
- The **2025 Coordinated Plan** identifies programs and strategies to aid older adults, individuals with disabilities, low-income individuals, and other underserved communities living within the NFRMPO region.

Disadvantages

- None noted

Analysis/Recommendation

The **2025 Coordinated Plan** meets requirements set forth by the FTA. The NFRMPO Planning Council approved the **2025 Coordinated Plan** on December 4, 2025. This memorandum informs the NFRMPO TAC of the approval of the **2025 Coordinated Plan**.

Attachments

- **2025 Coordinated Public Transit/Human Service Transportation Plan (Coordinated Plan) Executive Summary**

0

Executive Summary



Image 1: RAFT vehicle at local parade. Image Credit: RAFT

Background

The purpose of the **2025 Coordinated Public Transit/Human Services Transportation Plan (Coordinated Plan)** is to identify transportation issues, service overlaps, and gaps affecting vulnerable populations, including older adults, individuals with disabilities, low-income individuals, and other underserved communities, across urban and rural areas of Larimer and Weld counties. This plan also outlines goals and strategies to address these identified issues.

As a recipient of Federal Transit Administration (FTA) \$5310 funds, the North Front Range Metropolitan Planning Organization (NFRMPO) updates the **Coordinated Plan** every four years with input from the Larimer and Weld County Mobility Committees, the joint Northern Colorado Mobility Committee, local stakeholders, transportation providers, and the public. All stakeholders acknowledge the need for improved transportation for older adults, individuals with disabilities, low-income individuals, and other underserved communities. It remains a persistent issue in both large and small, urban, and rural communities within the NFRMPO region. Current programs and strategies are inadequate to meet this increasing demand and require additional support.

Purpose and Scope

The **2025 Coordinated Plan** identifies transportation needs, service gaps, and overlaps for vulnerable populations, including older adults, individuals with disabilities, low-income individuals, and other underserved communities across Larimer and Weld counties. It provides a strategic framework to guide the efficient use of limited transportation resources and improve mobility and quality of life for these populations.

Development Process

The **2025 Coordinated Plan** was developed through a collaborative and inclusive process that included public outreach and surveys, input from the Larimer and Weld County Mobility Committees and the joint Northern Colorado Mobility Committee, engagement with local transit agencies, non-profits, and stakeholders, and coordination with regional and state transportation plans.

Key Issues Identified

Throughout the development of the **2025 Coordinated Plan**, stakeholders identified several key issues, such as:

- Limited cross-jurisdictional transportation options
- High transportation costs
- Volunteer driver shortages
- Insufficient support for temporarily disabled individuals
- Challenges in recruiting and retaining transit drivers
- Lack of awareness about existing services
- Inadequate transportation options and access in rural areas or new developments

Recommended Strategies

The **2025 Coordinated Plan** serves as a strategic framework to ensure that limited transportation resources are used effectively, while maximizing independence and quality of life for those who rely on specialized transportation services. The following recommended strategies were drafted to address these concerns:

- **Strategy 1: Coordination**
- **Strategy 2: Education**
- **Strategy 3: Collaboration**
- **Strategy 4: Infrastructure and Funding**
- **Strategy 5: Non-Mobility Improvements**

Strategy 1: Coordination

Coordination highlights the importance of collaboration among local transportation providers, human service agencies, stakeholders, the public, and other community organizations. The goal of **Coordination** is to assist in providing additional transportation, mobility, and human services through a coordinated effort among providers, stakeholders, and the public. This joint effort aims to eliminate barriers to transportation access, with initiatives such as *RideNoCo*, the NFRMPO's One Call/One Click Center program, serving as models for this strategy.

Strategy 2: Education

Education emphasizes the importance of a proactive approach in informing the community about transportation options. The goal of **Education** is to raise awareness of services that enhance and improve mobility and access for older adults, individuals with disabilities, low-income individuals, and other underserved populations. This includes strategic investments in travel training, presentations, cross-promotion, outreach events, and educational campaigns such as the *Rider's Guides* and *Rack Cards*.

Strategy 3: Collaboration

Collaboration demonstrates how transportation providers, human service agencies, stakeholders, the public, and other community groups can work together most effectively through partnership. The goal of **Collaboration** is to promote collaboration among transportation and human service providers to improve service and resource delivery. Face-to-face or digital networks can help share strategies and address regional needs. Examples include the Larimer County, Weld County, and Northern Colorado Mobility Committees, which meet quarterly.

Strategy 4: Infrastructure and Funding

Infrastructure and Funding are both vital to the services essential to achieving the goals of the **Coordinated Plan**. The goal of **Infrastructure and Funding** is to address the backlog of

infrastructure upgrades, expansions, and state-of-good-repair projects. Programs such as Dial-A-Taxi (DAT), Dial-A-Ride (DAR), acquiring new and replacement vehicles for local agencies, and assisting with grant applications can be effective tools for improving services for vulnerable populations.

Strategy 5: Non-Mobility Improvements

Non-mobility Improvements are key strategies for addressing issues caused by bureaucracy, which can hinder effectively meeting the needs of vulnerable populations. The goal of **Non-mobility Improvements** is to address gaps unrelated to transportation that can benefit older adults, individuals with disabilities, low-income populations, and underserved communities. Approaches such as enhancing transportation access during zoning, exploring options for active transportation to boost public health, and implementing other strategies not focused solely on transportation can help decrease the demand for specialized services.

Performance Measures

Success will be evaluated using metrics such as the number of shared trips, the number of volunteer drivers, customer satisfaction, outreach participation, infrastructure improvements, ridership data, service coverage, and other performance measures stated in the **2025 Coordinated Plan**.

Funding Context

The **2025 Coordinated Plan** leverages FTA \$5310 funds and encourages braiding of federal, state, and local funding sources. The **2025 Coordinated Plan** also highlights opportunities through programs such as the Older Americans Act, the Older Coloradans Act, the Carbon Reduction Program (CRP), the Clean Transit Enterprise (CTE), Medicaid, Medicare, Veterans initiatives, and other funding options.

EXECUTIVE SUMMARY of the
North Front Range Transportation and Air Quality Planning Council
December 4, 2025

CONSENT AGENDA

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

AIR QUALITY AGENDA

Regional Air Quality Council (RAQC) – Stephens noted RAQC approved the Blueprint. Stephens stated there will be additional votes on the Blueprint as edits are made.

Nonattainment Area Air Pollution Mitigation Enterprise (NAAPME) – Stephens announced NAAPME has approved their annual report. Stephens noted NAAPME will begin discussing the larger grant program in March. This grant program is aimed for BRT and transit projects.

METROPOLITAN PLANNING ORGANIZATION (MPO) AGENDA

REPORTS:

Report of the Chair – Olson noted there will be a ballot initiative in 2026 to redirect some sales tax revenue from vehicle-related taxes to transportation. Council expressed interest in having the group spearheading the ballot initiative to give a presentation to Council.

Executive Director Report – Relford noted the EPA posted the Maricopa Association of Governments (MAG) 179B analysis for public comment and asked if Council would like to submit a letter of support during the public comment period that ends on December 19th. James recognized Dr. Annareli Morales with Weld County. Dr. Morales provided a high level overview noting there is a significant amount of ozone coming into the region from surrounding states and from other countries. James **moved** to direct the Executive Director to draft a letter of support to submit to EPA prior to the public comment period. The motion was **seconded** by Cline and **passed** by a vote of 9 to 2. Then, Relford noted the NFRMPO has three RFPs out to bid for the Regional Transportation Demand Model, IT Services, and AuditServices. The goal is to have contracts by the end of the year and early January. Relford stated the MPOs office lease goes out to February 2027 and Relford will work with Cushman & Wakefield to begin looking into other locations to use for lease negotiations. NFRMPO staff had an organizational deep dive on November 18th and will put forth strategic plan recommendations for 2026.

PRESENTATION:

State Demographer Presentation – **State Demographer** Watkins gave an overview of the relationship between people and the economy. Both the national and statewide fertility rates are lower than they have been historically, and the population is aging which is resulting in slower population growth. The projected population estimates for both Larimer and Weld Counties have gone down between 2023 and 2024 due to changes in net migration estimates. This is due to housing costs, immigration policy, and a slowdown in job growth. Watkins noted Colorado's population growth is still anticipating outpacing the nation in population growth, but this may change due to housing affordability. Watkins discussed Larimer and Weld Counties demographic estimates. Larimer County has a rapidly aging population with a slowdown in school aged children while Weld County is seeing significant net migration of young families and is anticipated to continue to lead the state in births. Watkins outlined some of the factors that can change population forecasts and discussed alternate population scenarios.

ACTION ITEMS:

[2026 Officer Elections](#) – Chair Olson opened nominations for 2026 Planning Council Chair. James nominated Stephens for Chair. The motion was seconded by Heid and Stephens was elected 2026 Planning Council Chair by acclamation.

James nominated Heid for Vice Chair. The motion was seconded by Karspeck and Heid was elected 2026 Council Vice Chair by acclamation.

[NFRMPO Front Range Passenger Rail District Board Members](#) – Relford noted Canonico’s term ends on December 31, 2025, and Mallo’s term ends in 2027. Both Canonico and Mallo expressed interest in staying on the FRPR Board of Directors. Both Mallo and Canonico agreed to continue to attend Planning Council meetings to provide updates and both agreed to step down at any point if requested by the Council.

James **moved** to approve *RESOLUTION 2025-28 APPROVING NFRMPO REPRESENTATIVES TO THE FRONT RANGE PASSENGER RAIL DISTRICT BOARD OF DIRECTORS*. The motion was **seconded** by Karspeck and **passed** unanimously.

DISCUSSION ITEMS:

[2022-2026 NFRMPO Targets for Safety Performance Measures](#) – Graalum gave an overview of both Statewide and Regional crash trends. Graalum noted there are five federally required safety performance measures that are updated annually and are set based on a five-year rolling average. The NFRMPO can either support CDOT’s targets or set regionally specific targets. Through 2023, the NFRMPO supported CDOT’s targets. In 2024 and 2025, the NFRMPO set regionally specific targets. Graalum outlined three different options. These options are to support CDOT’s targets, set regionally specific targets using a forecast equation, or set regionally specific targets using a percentage reduction. TAC recommended setting regionally specific targets using a forecast equation. Graalum outlined the NFRMPO Towards Zero Deaths Policy and noted TAC expressed interest in updating that policy. Council expressed support for setting regionally specific targets using a forecast equation and updating the NFRMPO’s Towards Zero Deaths Policy.

[Foothills Transit Station MMOF Match Relief Request](#) – Joshua Ma, City of Fort Collins, discussed Transfort’s request for local match relief on previously and newly awarded MMOF funding after the NFRMPO MMOF Reconciliation for the project Foothills Transit Station and Roundabout. Transfort is requesting a local match rate reduction from 50% to 25%. The reason for this request is because a majority of the project boundaries are within Larimer County, which only uses 25% local match rate compared to Fort Collins’ 50% local match rate. Council expressed support for this match reduction request.

Northern Colorado Mobility Committee — November Minutes

November 4th, 2025

1:00 p.m. – 3:30 p.m.

Call Meeting to Order, Welcome, and Overview of Agenda

In Person:

- Steve Teets, WAND
- Robyn Upton, WAND
- Celeste Stewart, Envision
- Irene Davila, Adeo
- Heidi Pruess, Larimer County
- Megan Kaliczak, zTrip
- Katlyn Kelly, Transfort

Virtual:

- Anna Rose Cunningham, Loveland
- Jaclynn Streeter, GoNoCo34 TMO
- Heidi Pruess, Larimer County
- Dana Klein, Estes Park
- Trevor Trepanier, GET
- Monica Wickstrom, Weld County AAA
- Ty Bereskie, City of Evans

Staff:

- Aaron Hull- Mobility Planner
- Tanya Trujillo-Martinez-Mobility Director
- Elizabeth Relford- Executive Director

Introductions & Icebreaker

Both virtual and in-person attendees introduced themselves and their organizations, along with what they are looking forward to this Winter.

Public Comment

No public comment was made.

Approval of August Minutes

Kaliczak made a motion to approve the August minutes, seconded by Teets. The Northern Colorado Mobility Committee unanimously approved the August Minutes.

Activity

Speed Networking

Both the in-person and virtual groups participated in a speed networking exercise to get to know each other and learn more about their respective organizations and services. Participants also had the opportunity to provide updates about their respective organizations.

Presentations

RideNoCo Updates

Hull provided a Ride NoCo update. Hull updated the Committee that this year's calls are trending similarly to last year's and that website visits are trending higher than expected at this time of year compared to the same period the previous year, with RideNoCo receiving 289 calls and 6,582 website visits so far this year. Hull also discussed the many outreach events attended in October. Hull explained that Staff believe calls made in October are trending slightly lower than last year due to staffing issues at the call center. Hull noted that the NFRMPO does not have a dedicated Mobility Specialist in the call center and that the current Mobility Specialist is on leave. Hull explained that this shows the need for a dedicated full-time Mobility Specialist in the call center to respond to callers' needs.

Teets spoke about the importance of outreach events and the importance of taking part in Weld Project Connect. Hull talked about how RideNoCo is seeing an increase in Veteran calls and in Spanish-speaking callers, and the number one need for rides remains medical. Hull also presented the new data points, shared highlights with the group, and discussed the latest printed materials, which were highlighted alongside the provider's guide. Hull also made invites for the UC Health Aspen Club Mobility Fairs and discussed the upcoming outreach events.

Discussion



Recommendation of Approval and Adoption of the 2025 Coordinated Plan

Hull informed the Mobility Committee that the 2025 Coordinated Plan will be presented to the NFRMPO Planning Council on Thursday, November 6th, 2025, for the first reading and discussion, followed by a 30-day public comment period from November 7th to December 7th. Hull also explained that the 2025 Coordinated Plan will go for its second reading and approval on December 4th.

Hull then provided an overview of the 2025 Coordinated Plan discussing the Plan's background, what has happened since the 2021 Plan, updated urban area information, the public and volunteer transportation options, the older adult and disabled individual demographics, the outreach efforts for the Plan, gaps in services heard during outreach, the ideas and strategies for addressing these service gaps, what's next for the Plan, and Staff Recommendation for approval. After Hull talked about the 2025 Coordinated Plan, Hull opened the discussion to the Committee for questions, comments, or recommendations.

Teets asked how much funding is received under 5310 each year, and Elizabeth Relford explained online that, on average, the NFRMPO Mobility Program receives \$50,000 to \$75,000 in combined FTA funding each year. Teets discussed the importance of advocating for seniors and individuals with disabilities, and the Committee reiterated that this is the intent and effort of the mobility team and the coordinated plan. Teets requested the locations for the November and December NFRMPO Planning Council Meetings with NFRMPO Staff, explaining that the November Planning Council will be held at the Loveland Public Works Building at 2525 W. 1st Street, and the December Planning Council will be held in Timnath at 4750 Signal Drive.

The NCMC made a motion to approve the 2025 Coordinated Plan and to recommend approval to the NFRMPO Planning Council, as proposed. The motion was made by Kaliczak and seconded by Teets. The Northern Colorado Mobility Committee unanimously approved the 2025 Coordinated Plan and recommended approval to the NFRMPO Planning Council, as proposed.

Break

A Break was taken from 2:05 to 2:15

Discussion Continued

MyWayToGo Demonstration and Outreach Discussion

Hull discussed the platform's launch in 2026 and explained its background and rationale, which aim to reduce congestion, reduce SOV, and improve air quality. Hull demonstrated the platform to the Committee, and then Hull opened it up for questions.

The Mobility Committee discussed possible challenges that the NFRMPO could host and recommendations for when to host challenges with ideas such as walk and roll weeks, the annual



bike month, May Mobility Awareness Month, Week without Driving, which falls at the end of September to typically the beginning of October, free fare weeks during the summer. The Mobility Committee highlighted that challenges should be launched when the weather is prime for walking and biking, and when it would be an enjoyable time to kick off. Discussion ensued on whether the NFRMPO should hold kickoffs with universities and on timing challenges with community colleges, such as Aims or Front Range, which need the most support regarding transportation issues. Teets explained that he thinks that Winter would be a suitable time for a launch because people need mobility options and support the most during that time.

Mobility Case Studies

Hull discussed the first mobility case study for this meeting, which featured a caller in Johnstown who needs rides to regular medical appointments in Loveland and Fort Collins. Hull explained that the individual is 60 years old, disabled, and uses a walker. Hull mentioned that the individual does not have transportation coverage through their insurance and needs free or low-cost transportation. Hull described that the caller has had difficulty in the past finding wheelchair-accessible transportation between Fort Collins and Johnstown and back, as well as having issues with Uber and Lyft. Hull mentioned that the individual reached out to Via Mobility Services and told them they could get rides to Fort Collins but not back to Johnstown.

The Committee discussed the mobility case study. Teets raised the question of why VIA could go to Fort Collins but not back to Johnstown, and a discussion ensued on the possible reasons. Kaliczak asked whether this was a same-day pickup request or scheduled in advance, and the debate ensued. Discussion from the Committee was about whether the individual could use two providers to provide these services, with one possible each way.

Kaliczak explained that with zTrip, it would be possible to get back to Johnstown from Fort Collins; however, the one-way fare would cost about \$60-\$70. Kelley explained that if the individual signed up with Dial-A-Taxi through Transfort, they could save \$20 on their zTrip ride. Discussion ensued on how the individual could use Via to get to the appointment and zTrip to get back, and how this would be a viable option, but not too affordable for everyone.

Hull discussed the second mobility case study for the meeting, which concerned a veteran living in Greeley who needs a ride to Boulder for a procedure. Hull explained that the individual uses a walker and has VA insurance, with no transportation benefits. Hull explained that when he called RideNoCo, he was provided with resources for Veterans that the NFRMPO is aware of, such as the Veteran Transportation Service and Qualified Listeners, a veteran support non-profit organization in the area.

The Mobility Committee discussed various regional transportation options, including Bustang, the Poudre Express, and FLEX bus routes, for getting to Boulder from Greeley. The Committee also discussed the difficulties with using these different services due to timing and routing issues.



Kaliczak asked about future US 34 bus routes, and Trepanier discussed with GET the routes that would connect to Bustang and the Poudre Express, and how that could help in the future. The Committee concluded that it would be difficult to get to Boulder from Greeley and that there were more barriers than solutions.

Wrap-Up + Round Table

Announcements & Member Updates

No announcements in the room or online.

Second Round of Public Comment

No public comment was made.

Agenda Suggestions

Teets discussed a few agenda requests for future meetings, including three requests for the NFRMPO to invite Bustang to provide updates in 2026, to have a provider spotlight on Transdev or the future Medicare transportation provider for the state, and more information on Go-Go Grandparent and Smartride.

Meeting Adjourn

Motion made by Teets to adjourn the NCMC, seconded by Kaliczak, with the meeting adjourning at 3:20 p.m.

Upcoming Meetings

- Weld County Mobility Committee: December 16th, 2025*
- Larimer County Mobility Committee: January 27th, 2026*
- Northern Colorado Mobility Committee: February 24th, 2026

***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.

Subject: Air Quality Related Activities Report to NFRMPO Council

Date: 11/24/25

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 December 4, 2025, meeting.

Summary:

In November 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. Highlights include the AQCC Serious Ozone State Implementation Plan (SIP) Rulemaking Hearing and the RAQC's announced December 12, 2025 meeting to walk through use of their recently released tools showing what is contributing to ozone levels at each monitor and how ozone levels at those monitors may respond to different types of control strategies.¹ Further, EPA proposed to designate the Phoenix-Mesa area of Arizona, as having attained the 70 ppb 2015 Ozone National Ambient Air Quality Standard by the 8/3/24 attainment date, and in doing so proposing to approve their 179B analysis.²

Air Quality Activities:

AQCC Activities:

The AQCC welcomed two new Commissioners: Shelly Miller, a CU Engineering Professor and Jim Sewell, a Shell environmental professional retiree.

In November, the AQCC was briefed or acted on landfill methane, Colorado's Regional Haze SIP, lawn and garden zero emission equipment and Colorado's Ozone SIP. They voted to reopen the rulemaking record to accept a compromise proposal regulating landfills for methane – a compromise that gives some smaller landfills longer time to comply with methane control equipment. They acted on CDPHE's letter withdrawing an element of Colorado's Regional Haze SIP. They were briefed on market share of zero emissions equipment sales and briefly touched on outreach efforts to expand their Emission Reduction Requirements for Lawn & Garden Equipment (Regulation 29) to more broadly apply to commercial operations. Commercial operators are already indirectly subject to Regulation 29 if they provide lawn and garden services to local governments and Colorado state agencies.

The bulk of the meeting focused on Colorado's Serious Ozone SIP related to the 2015 Ozone National Ambient Air Quality Standard (NAAQS) of 70 ppb for the Denver Metro North Front Range nonattainment area. Public comments were provided that touched upon frustrations that Colorado has not been able to meet ozone standards for decades and climate change concerns, and requests for a balanced approach to regulation.

¹ See RAQC's "Source Apportionment and DDM Dashboards Forum" for meeting registration and access to supporting information here: <https://raqc.org/event/dec-2025-sa-ddm-forum/>

² See EPA's "Determination of Attainment by the Attainment Date but for International Emissions for the 2015 Ozone National Ambient Air Quality Standards; Phoenix-Mesa Nonattainment Area, Arizona," 90FR52019, 11/19/25, here: <https://www.govinfo.gov/content/pkg/FR-2025-11-19/pdf/2025-20357.pdf>

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

The APCD adopted Colorado's Serious Ozone SIP unanimously, with many elements of the proposal receiving consensus support. Areas of disagreement included the following SIP revisions, and a few issues that were outside the scope of the rulemaking where the AQCC did not act. Disagreement on proposed SIP revisions related to the:

1. APCD proposal to control Oil & Gas separator maintenance activities. The APCD withdrew this element of their proposal, which was inconsistent with the RAQC's proposal, and agreed to bring back a revised proposal in Spring 2026.
2. APCD proposal to clarify Colorado's current Emission Reduction Credits (ERCs) Program. While all parties supported the overall APCD proposal, several parties raised concerns about the scope and methodology for certifying those reductions and whether or not reductions from plugging and abandoning wells could be certified given that other wells would be drilled in the same area. Generally, ERCs can be obtained for non-mandated reductions for which companies can apply for credits to bank, trade and sell to other companies. Companies that need to build new or modify existing sources in the

nonattainment area must secure these ERCs to offset increased emissions from the new construction or modifications as required by the federal Nonattainment New Source Review Permitting Program as part of the permitting process and prior to construction. Colorado currently has no certified ERCs for use, nor does the proposed program expressly allow mobile sources reductions to be creditable.

3. APCD proposed 185 Penalty Fee Program. Disagreement centered around the timing and process to get an EPA approvable fee program plan in place prior to next ozone attainment date under the 2015 Ozone NAAQS, or by 7/20/27. The APCD was proposed to move forward with the current proposal, while still negotiating with the current EPA Administration on program revisions, and potentially withdrawing and resubmitting revisions at a later date. Note that the current EPA Administration has not definitively stated it could or could not approve the current proposal, even though it uses current EPA approved programs as a model. As background, the fee program is a Clean Air Act mandated program that must be in place prior to the next attainment date as a Serious nonattainment area, and which would be automatically triggered, taking effect upon designation of not attaining the NAAQS by that attainment date. The program will require industry in the nonattainment area to begin paying additional and significant fees.
4. APCD proposal to clarify emissions reporting nuances, reporting annual actual emissions and avoiding conflicts with federal performance testing requirements.

Other areas of disagreement during this ozone rulemaking related to the Clean Air Act's Section 179B provisions and the RAQC's Blueprint. Several parties suggested that Colorado undergo a 179B analysis similar to Arizona. The APCD indicated that they have not taken any formal position on the matter. The RAQC indicated that the recent modeling conducted associated with the Serious SIP under the 2025 Ozone NAAQS did not analyze international contributions in order to support a 179B analysis at this time. Other parties argued against pursuing 179B. Ultimately, the AQCC did not take a position on the matter as it was not part of the scope of this rulemaking and at least one Commissioner highlighted that any such 179B analysis would not bring the area into attainment nor waive the requirement for any nonattainment area to attain the standard.

Separately, several parties questioned whether or not the AQCC would take an official position approving the RAQC's Blueprint and argued against such. The AQCC did not take an official position, nor did the RAQC ask the AQCC for an official position. Notably, the RAQC Chair noted that the RAQC would continue to evaluate each control strategy and further develop them, stating that replacement strategies would have to be identified and developed in place of any currently listed strategies in the Blueprint selected to not move forward.

During final deliberations, the Commission asked for an introduction to atmospheric chemistry briefing in the spring to be complemented by a briefing on all air quality studies on-going in Colorado. The Commission also expressed interest in hearing more about the RAQC's public health impacts analysis/report to be released in early 2026. Finally, the Chair expressed significant frustration with references to politics being made during testimony and rebuttals. Ultimately, the AQCC adopted the bulk of the proposal as a consensus proposal making minor changes during this hearing, agreeing that the action satisfies Colorado's requirements as a Serious nonattainment area with the understanding that Colorado submits a voluntary request for reclassification to a Severe nonattainment area. There will be more to come.

APCD Activities

APCD public efforts in November largely focused on the Ozone SIP Rulemaking Hearing.

RAQC Activities

The RAQC Board endorsed the November 7, 2025 Blueprint, as a process for further refining and evaluating listed control strategies at their November 7, 2025 retreat. This endorsement was specific to the Blueprint as a whole and “not any particular strategy”. RAQC staff then discussed this Blueprint at the AQCC Ozone SIP Rulemaking hearing.

The RAQC held their Fall 2025 Ozone Forum.³ During this forum, the RAQC and its contractor, Ramboll, 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. RAQC staff continue to anticipate that the nonattainment area will still be unable to model attainment with the 70 ppb NAAQS. There was a discussion on their “Direct Decoupled Method” for ozone modeling – a method that is intended to streamline the assessment of control strategies on each individual monitor, provide a more efficient way of evaluating multiple changes individually or in combination, and derive the sensitivity of the modeled ozone values to control strategies – that reduces the burden and cost of attainment demonstration modeling.

Additionally, the RAQC’s announced December 12, 2025 meeting to walk through use of their recently released tools showing what is contributing to ozone levels at each monitor and how ozone levels at those monitors may respond to different types of control strategies.⁴

TRE will report more information after taking more time to review the various analyses, work with the modeling tools and attend the RAQC’s December 12, 2025 training on use of these tools.

Other Air Quality Activities:

EPA approved Colorado’s Vehicle Inspection and Maintenance Program Revision specific to visual inspection of emission control equipment during testing.⁵

EPA also proposed to determine that the Phoenix-Mesa Nonattainment Area in Arizona would have attained the 2015 Ozone NAAQS by the 8/3/24 attainment date, preventing the area from being downgraded from a Moderate to a Serious classification.⁶ This action relies upon the Maricopa Association of Governments’ (MAG) 179B analysis.⁷ As highlighted last month,

³ See RAQC’s Fall 2025 Ozone Attainment Forum webpage for agenda and materials, here:

<https://raqc.org/event/fall-2025-ozone-attainment-forum/>

⁴ See RAQC’s “Source Apportionment and DDM Dashboards Forum” for meeting registration and access to supporting information here: <https://raqc.org/event/dec-2025-sa-ddm-forum/>

⁵ See EPA’s “Air Plan Approval; Colorado; Inspection and Maintenance Program Revision,” 90FR51515, November 18, 2025, here: <https://www.govinfo.gov/content/pkg/FR-2025-11-18/pdf/2025-20205.pdf>

⁶ See EPA’s “Determination of Attainment by the Attainment Date but for International Emissions for the 2015 Ozone National Ambient Air Quality Standards; Phoenix-Mesa Nonattainment Area, Arizona,” 90FR52019, 11/19/25, here: <https://www.govinfo.gov/content/pkg/FR-2025-11-19/pdf/2025-20357.pdf>

⁷ See Maricopa Association of Governments’ “MAG 2025 Clean Air Act Section 179B(b) Retrospective Demonstration of the Impact of International Emissions on Ozone Concentrations in the Maricopa Nonattainment

MAG's analysis shows that on average international contributions, combined with wildfire and background contributions, impact their ozone monitors by 15 ppb. Notably, their analysis goes beyond looking at international contributions. Their analysis also analyzes wildfire impacts, background, biogenics, and more.

logy and long-range transport, and it appears that it goes beyond a typical Clean Air Act Section 179B demonstration. While Colorado is likely impacted differently than Arizona, or any other state, given our unique location, topography, meteorology, climate, and contributions from man-made sources and other factors, Colorado may want to consider taking a similar approach to MAG's broad analysis that goes beyond simply looking at international contributions. It is also very relevant to the larger intermountain west region.

MAG focused on doing a retrospective analysis, hence the reference to Clean Air Act Section 179B(b), meaning looking backwards in reference to a past attainment date and using actual monitored data, demonstrating that the area would have attained the standard but for international contributions. Note that a prospective 179B analysis or 179B(a) analysis looks forward and relies more on modeling projections in reference to a future attainment date.

MAG's 179B(b) analysis, analyzed international contributions coming from Mexico as well as from Asia. Additionally, MAG's analysis highlights that EPA conducted important modeling in support of MAG's analysis, confirming MAG's work. This also means they worked with EPA and shared resources and costs.

MAG's analysis shows that on average, international emissions from both Mexico and Asia combined with other non-locally controllable sources – wildfire and background - contribute 15 ppb to their ozone monitors throughout the year.⁸ Notably, those international concentrations are lower during the summer ozone season, especially mid-July through mid-September, when ozone exceedances of the standard are more common (see Figure 3-2 below, between 7/15/23 and 9/15/23).⁹

Area," September 2025, here: [https://azmag.gov/portals/0/Environmental/Air-Quality/2025/MAG-2025-CAA-Section-179B\(b\)-Retrospective-Demonstration.pdf](https://azmag.gov/portals/0/Environmental/Air-Quality/2025/MAG-2025-CAA-Section-179B(b)-Retrospective-Demonstration.pdf)

⁸ Ibid, Table 3-1. p. 31.

⁹ Ibid, Figure 3-2. p. 31.



Table 3-1. Summary results of ozone source apportionment modeling.

Source Apportionment Modeling Results	2023 Ozone Design Value Including International Emissions	2023 Ozone Design Value Excluding International Emissions	2023 Ozone Impact of International Emissions
Average of All Nonattainment Area Monitors	75 ppb	60 ppb	15 ppb
Average of All Nonattainment Area Monitors with Wildfire Days Excluded	73 ppb	57 ppb	16 ppb
Maximum Ozone Concentration Monitor	80 ppb	66 ppb	14 ppb
Maximum Ozone Concentration Monitor with Wildfire Days Excluded	77 ppb	62 ppb	15 ppb

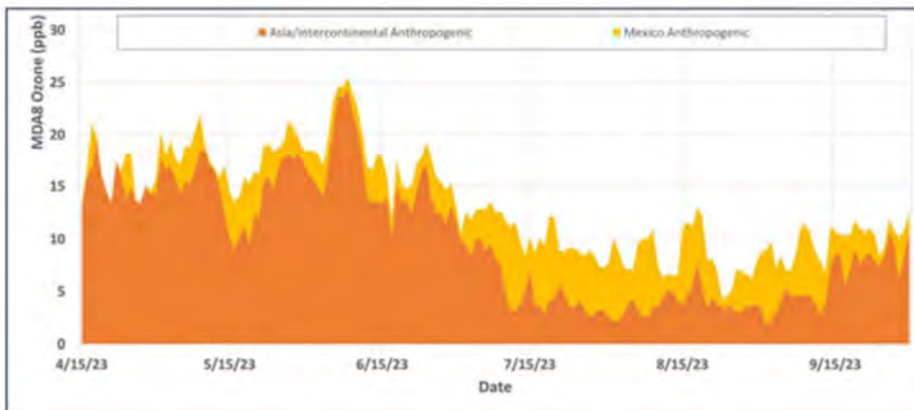


Figure 3-2. Time series of modeled Asia/intercontinental and Mexico international manmade emissions contributions to ozone during the 2023 ozone season averaged over all Maricopa Nonattainment Area monitoring sites.

MAG also analyzes the amount of wildfire impacts on monitored ozone levels, illustrating that ozone levels would have been much closer if not below the 70 ppb standard.¹⁰

¹⁰ Ibid, Figure 2-7. p. 23.

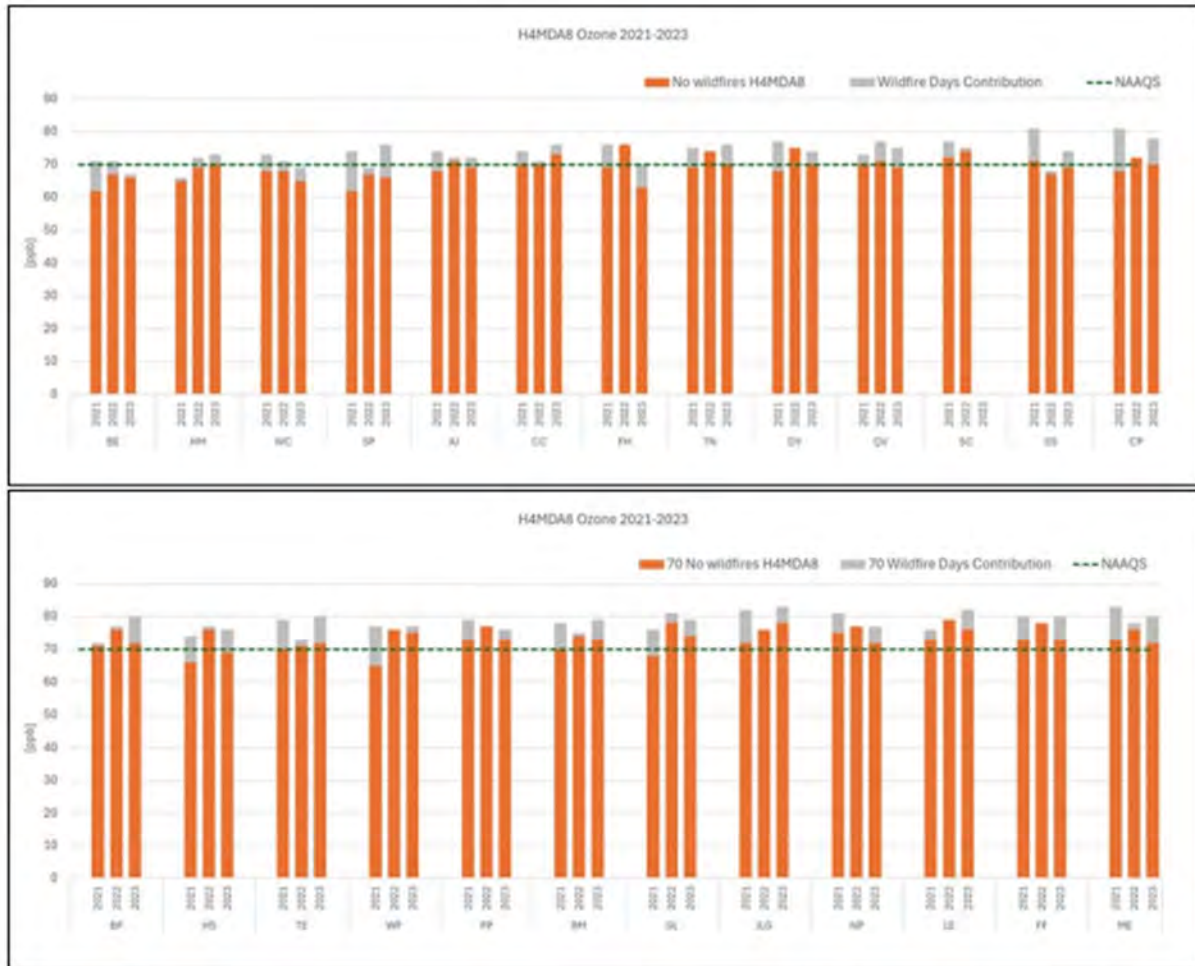


Figure 2-7. Annual fourth highest ozone concentration in 2021 through 2023 at each of the Maricopa Nonattainment Area ozone monitors considering contributions from all possible wildfire days (grey) and non-wildfire days (orange).

Additionally, MAG shares info on background ozone levels in the intermountain west illustrating that the intermountain west was impacted from background ozone from Asia using data for specific dates in 2015 and 2017.^{11,12} Further, this information seems to show that impacts can be higher inland than on the coast, and higher at elevation.

¹¹ Ibid, Figure 2-9. p. 27.

¹² Ibid, Figure 2-11. p. 28.

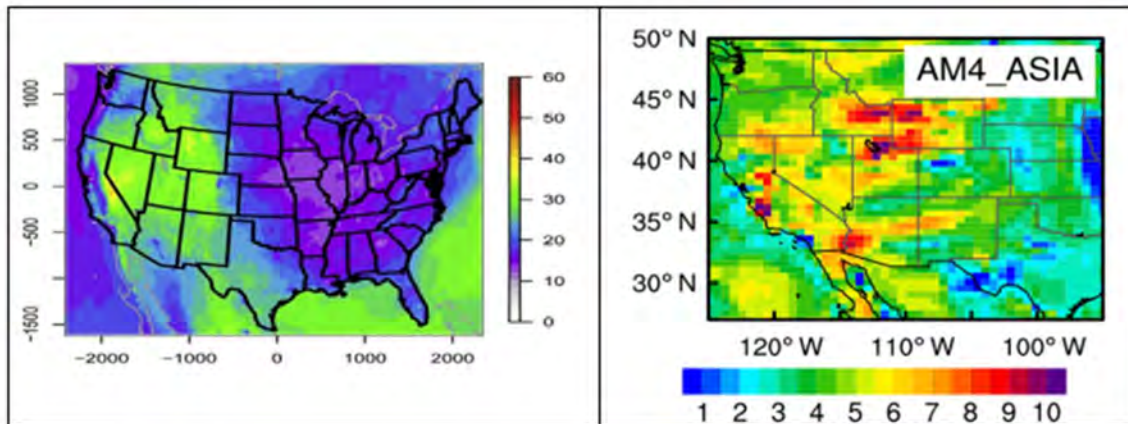


Figure 2-10. Examples of modeled surface background ozone (ppb) (left) showing July 2011 average US background from the CAMx regional photochemical model, and (right) showing tracked ozone from Asia on May 24, 2017.

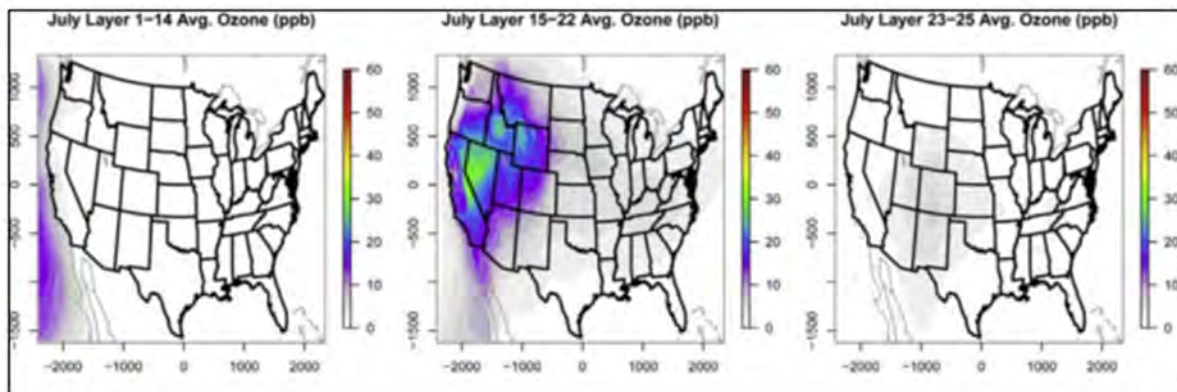


Figure 2-11. Results showing examples of US background ozone contribution (ppb) from the western CAMx boundary and from three sets of vertical model layers; boundary layer (left), mid troposphere (middle), stratosphere (right).

Comments on EPA's determination of attainment for Arizona, and the underlying 179B analysis are due 12/19/25.

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)

- 12/12/25 RAQC Training on modeling tools Forum (register here: <https://us02web.zoom.us/j/84461212121>)
- 12/17-19/25 AQCC 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 track EPA's proposed determination of attainment for the Phoenix-Mesa nonattainment area in Arizona
- NFRMPO should track Colorado's next steps addressing ozone, including:
 - RAQC's release of a report on public health impacts of ozone
 - AQCC briefings on atmospheric chemistry and air quality studies
 - Colorado's voluntary reclassification request
 - RAQC's Blueprint evolution
 - RAQC's modeling updates