

Updated March 3, 2017

Fort Collins and Greeley Carbon Monoxide Maintenance Areas Conformity Determination

for the

North Front Range Metropolitan Planning Area

2040 Fiscally Constrained Regional Transportation Plan Amendment

and the

FY 2016-2019 Transportation Improvement Program

and the

FY 2018-2021 Transportation Improvement Program

The North Front Range Metropolitan Planning Organization
419 Canyon Avenue, Suite 300 Fort Collins, CO 80521

Preparation of this report has been financed in part through grants from the Federal Highway Administration, Federal Transit Administration, Colorado Department of Health and the Environment, and local government contributions.

December 27, 2016



EXECUTIVE SUMMARY

This report demonstrates the Fort Collins and Greeley Carbon Monoxide (CO) Maintenance Areas meeting of federally prescribed air pollution emissions tests for the CO National Ambient Air Quality Standard (NAAQS). This demonstration is based on new travel demand projections and network assignments based on the FY2016-2019 Transportation Improvement Program (TIP) projects and the new travel demand projections and network assignments based on new projects selected for the FY2018-2021 TIP and projects whose completion years were moved forward. The out year remains 2040. All other assumptions remain the same from the previously approved conformity determination.

This document will be released to the public on November 11, 2016. It will be available on the North Front Range Metropolitan Planning Organization (NFRMPO) website at <http://nfrmpo.org/air-quality/> and at the NFRMPO Office as a print copy. The public comment period ends at 5:00 p.m. on December 10, 2016. All comments will be presented to the North Front Range Air Quality and Transportation Planning Council (NFRT&AQPC) on February 2, 2017 at the formal public hearing and at the Air Quality Control Commission (AQCC) public meeting on December 15, 2016.

A conformity determination report for the Denver-North Front Range 8-Hour Ozone Northern Subarea Nonattainment Area was prepared concurrently in coordination with this document to have the same effective date.

LIST OF ACRONYMS

APCD	Air Pollution Control Division
AQCC	Air Quality Control Commission
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CMAQ	Congestion Mitigation Air Quality
CO	Carbon Monoxide
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
MOA	Memorandum of Agreement
ICG	(Air Quality) Interagency Coordination Group
LUAM	Land Use Allocation Model
MOVES2014a	EPA's Motor Vehicle Emission Simulator model
MPO	Metropolitan Planning Organization
MVEB	Motor Vehicle Emissions Budget
NAICS	North American Industry Classification System
NAAQS	National Ambient Air Quality Standards
NFRT & AQPC	North Front Range Transportation and Air Quality Planning Council
NFRMPO	North Front Range Metropolitan Planning Organization
RTDM	Regional Travel Demand Model
PPM	Parts per Million
QCEW	Quarterly Census of Employment and Wages
RPP	Regional Priorities Program
RTP	Regional Transportation Plan
SIP	State Implementation Plan
TAC	Technical Advisory Committee
TCM	Transportation Control Measures
TIP	Transportation Improvement Program
UFR	Upper Front Range Transportation Planning Region
VMT	Vehicle Miles Traveled

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CHAPTER 1: INTRODUCTION

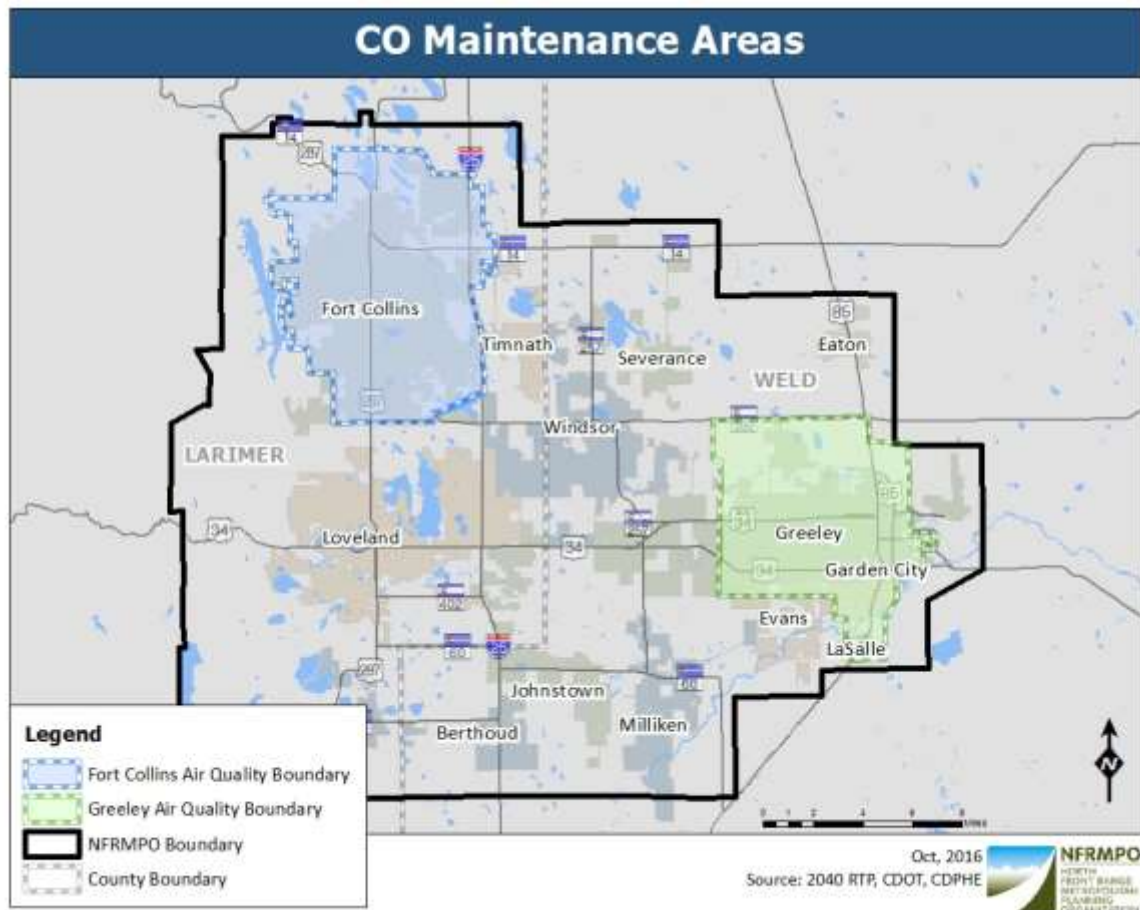
Background – Carbon Monoxide Maintenance Areas

The North Front Range Metropolitan Planning Organization (NFRMPO) serves as the Lead Planning Agency for Carbon Monoxide (CO) air quality issues in the North Front Range region. The NFRMPO has 15 local government members, including portions of Larimer and Weld counties and towns and cities within those counties.

The NFRMPO is required to conduct an air quality conformity determination on the Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP) to determine conformance with the Colorado Statewide Implementation Plan (SIP) and must comply with the Clean Air Act, the Transportation Conformity Regulation, the Statewide and Metropolitan Planning Regulation, and other applicable federal and state requirements.

Portions of the cities of Fort Collins and Greeley and their immediate vicinities are designated as maintenance areas for CO, shown in **Figure 1**.

Figure 1: Fort Collins and Greeley CO Maintenance Area Boundaries



Fort Collins Maintenance Area

The Colorado Air Quality Control Commission (AQCC) adopted the original residential request and Maintenance Plan for Fort Collins in 2002, and adopted the revision for a second 10-year maintenance plan in 2010 to show continued attainment of the federal CO standard for a second 10-year term of 2013 through 2023.

The Environmental Protection Agency (EPA) adopted the original residential request and maintenance plan for Fort Collins in 2003, and adopted the revision for a second 10-year maintenance plan in 2011 to show continued attainment of the Federal CO National Ambient Air Quality Standard (NAAQS) for a second 10-year term of 2013 through 2023.

Greeley Maintenance Area

AQCC adopted the first revision to the maintenance plan for Greeley in 2002, and approved the second 10-year revision in 2009, setting forth a requirement for continued demonstration of attainment of the federal CO standard for the second 10-year term through 2019.

EPA adopted the first revision to the maintenance plan for Greeley in 2005, and approved the second 10-year revision in 2013, setting forth a requirement for continued demonstration of attainment of the federal CO standard for the second 10-year term through 2019.

Motor Vehicle Emission Budgets

For **Fort Collins**, the Motor Vehicle Emissions Budget (MVEB) is:

- 94 tons per day for 2015 and beyond.

For **Greeley**, the MVEB is:

- 60 tons per day for 2015 and beyond.

Conformity determinations are performed against these emissions budgets. The air quality modeling and analyses address the forecasts of emissions from mobile sources within the maintenance area boundaries for CO.

Technical Evaluation and Model Assumptions

Staff in the Air Pollution Control Division (APCD) of the Colorado Department of Public Health and Environment (CDPHE) run the EPA-approved Motor Vehicle Emission Simulator (MOVES2014a) mobile emissions model. Conformity determinations are made using the output from the MOVES2014a model.

The North Front Range 2040 Regional Travel Demand Model (RTDM) provides the necessary socio-economic and transportation inputs. The 2012 base year model was built using data obtained from the *NFRMPO Household Survey* completed in April 2010, the 2010 U.S. Census for households, and the *Quarterly Census of Employment and Wages* (QCEW) for employment. The parameters for the base year model were applied to the staging years, in addition to the

forecasted socioeconomic data and fiscally constrained network, to determine Vehicle Miles Traveled (VMT), average speed, and lane miles.

The NFRMPO worked cooperatively with an Air Quality Interagency Coordination Group (ICG), consisting of members from the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), EPA, Colorado Department of Transportation (CDOT), Denver Regional Council of Governments (DRCOG), and APCD, to review the assumptions, analysis, and reports. Furthermore, members of the NFRMPO's Technical Advisory Committee (TAC) reviewed the socio-economic data and transportation network prepared for the RTP and TIP, pursuant to the State of Colorado's AQCC Regulation Number 10.¹

Public Participation

The NFRMPO invited public participation throughout the development of:

- the FY2016-2019 TIP,
- the FY 2018-2021 TIP,
- the fiscally constrained 2040 RTP Amendment, and
- this current conformity determination.

A public hearing notice will be published on December 2, 2016, with the documents made available to the public on November 11, 2016. The NFRT&AQPC will hold a public hearing regarding this conformity determination prior to their monthly meeting on February 2, 2017 at the Evans Community Complex, Cottonwood Room at 1100 37th Street, Evans, CO 80620. Minutes of the NFRMPO Council's public hearing will be included and available at the NFRMPO office and website: nfrmpo.org.

The FY2018-2021 TIP will also be made available for a 30-day public comment period from December 2 through December 31, 2016. Public comments will also be taken at the February 2, 2017 NFRT&AQPC meeting. It is anticipated the TIP will be adopted at this meeting.

The FY2016-2019 TIP was adopted on March 5, 2015 and updated on September 3, 2015. Public participation opportunities for the FY2016-2019 TIP included two public meetings and the availability of the document on the NFRMPO website and at the NFRMPO office for public review. A 30-day public comment period is provided for all TIP Policy Amendments.

The Public Involvement Plan (PIP) guides the NFRMPO's public participation activities for all plans and programs.

¹ 5 CCR 1001-12, <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=4498&fileName=5%20CCR%201001-12,2012>

CHAPTER 2: MEMORANDUM OF AGREEMENT RESPONSE

The information in this chapter addresses the required items in the *1998 Memorandum of Agreement (MOA) for Transportation Conformity Evaluations* by and between the Air Pollution Control Division (APCD) of the Colorado Department of Public Health and Environment (CDPHE) and the North Front Range Transportation and Air Quality Planning Council (NFRT&AQPC).

Transportation Control Measures

There are no commitments to Transportation Control Measures (TCMs) in the current State Implementation Plan (SIP), July 18, 2002 and December 12, 2002 respectively, for the Fort Collins or the Greeley Carbon Monoxide Maintenance Areas.

Roadway Networks

Figures 2 through 5 show the existing roadway network, functional classification, and area type for the cities of Fort Collins and Greeley. The networks were reviewed by the staffs of both cities for accuracy and approved, as outlined in Regulation Number 10.

Socioeconomic Data and Assumptions

In 2014, the North Front Range Metropolitan Planning Organization (NFRMPO) Technical Advisory Committee (TAC), serving as the review team, per Regulation Number 10, reviewed the planning assumptions, which were approved by the NFRT&AQPC.

Appendices C and D show the requested socioeconomic data for the CO areas. The tables include the following travel model information: speed by roadway type, VMT summaries, and lane miles by roadway type. The emissions summaries are also included.

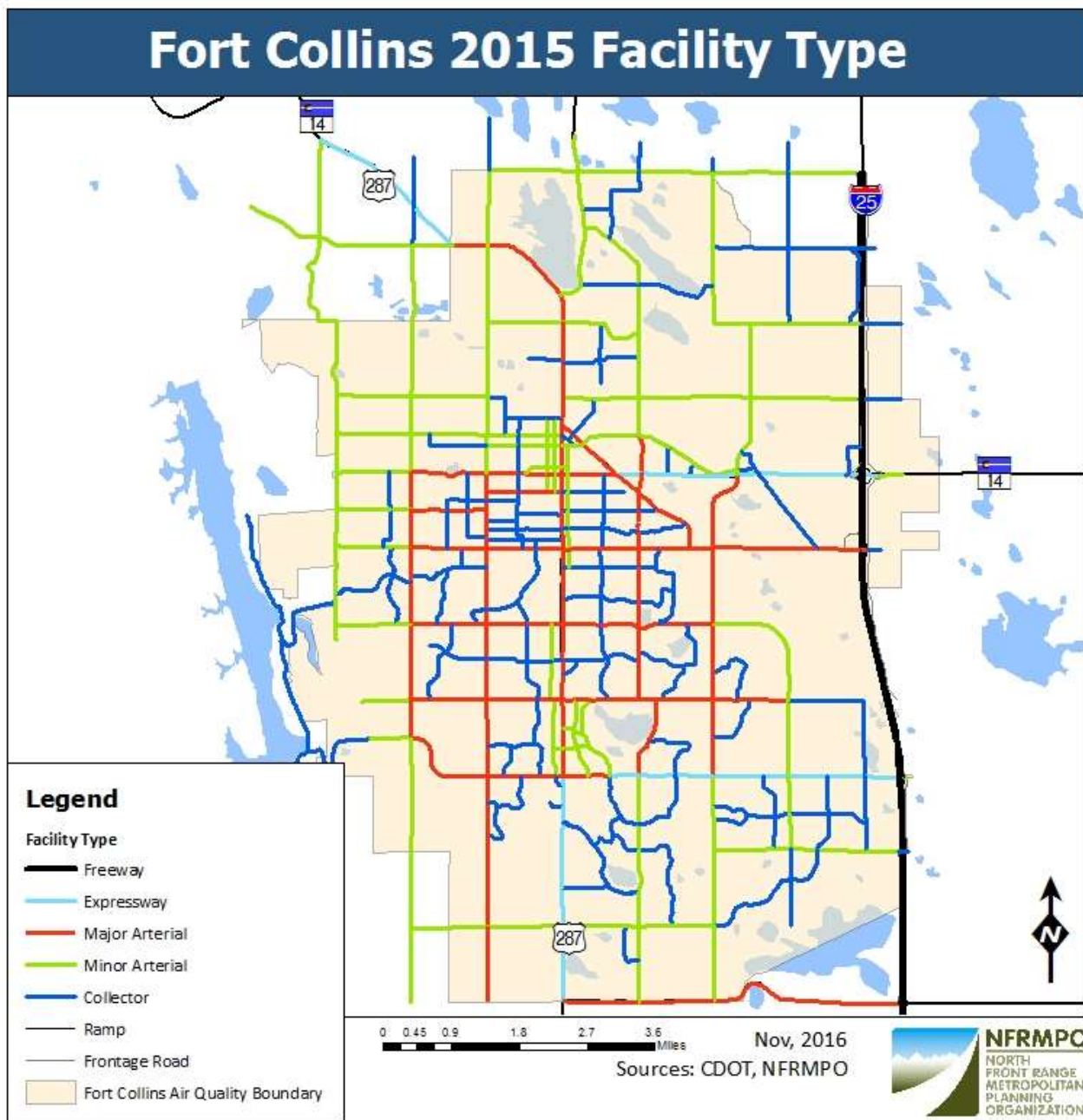
The NFRMPO hired Steven B. Fisher, Ph.D., Phyllis Resnick, Ph.D., and Logan Simpson Design, in conjunction with the State Demographer, to forecast household and employment numbers in five-year increments for the years 2010 to 2040 for the region.

The NFRMPO Land Use Allocation Model (LUAM) used CommunityVIZ software to allocate the control totals developed. The results were reviewed by staff members across the region operating as a review team, per Regulation Number 10.

The process for developing socioeconomic data in the modeling effort was based on a 2012 model base year using 2012 Assessor data, 2010 US Census for household data, and the Quarterly Census of Employment and Wages (QCEW) for the employment data. The employment data was geocoded to locate the employment by transportation analysis zone (TAZ). The employment was based on North American Industry Classification System (NAICS) codes to determine the employment type. The four employment types are Medical, Production, Retail, and Services.

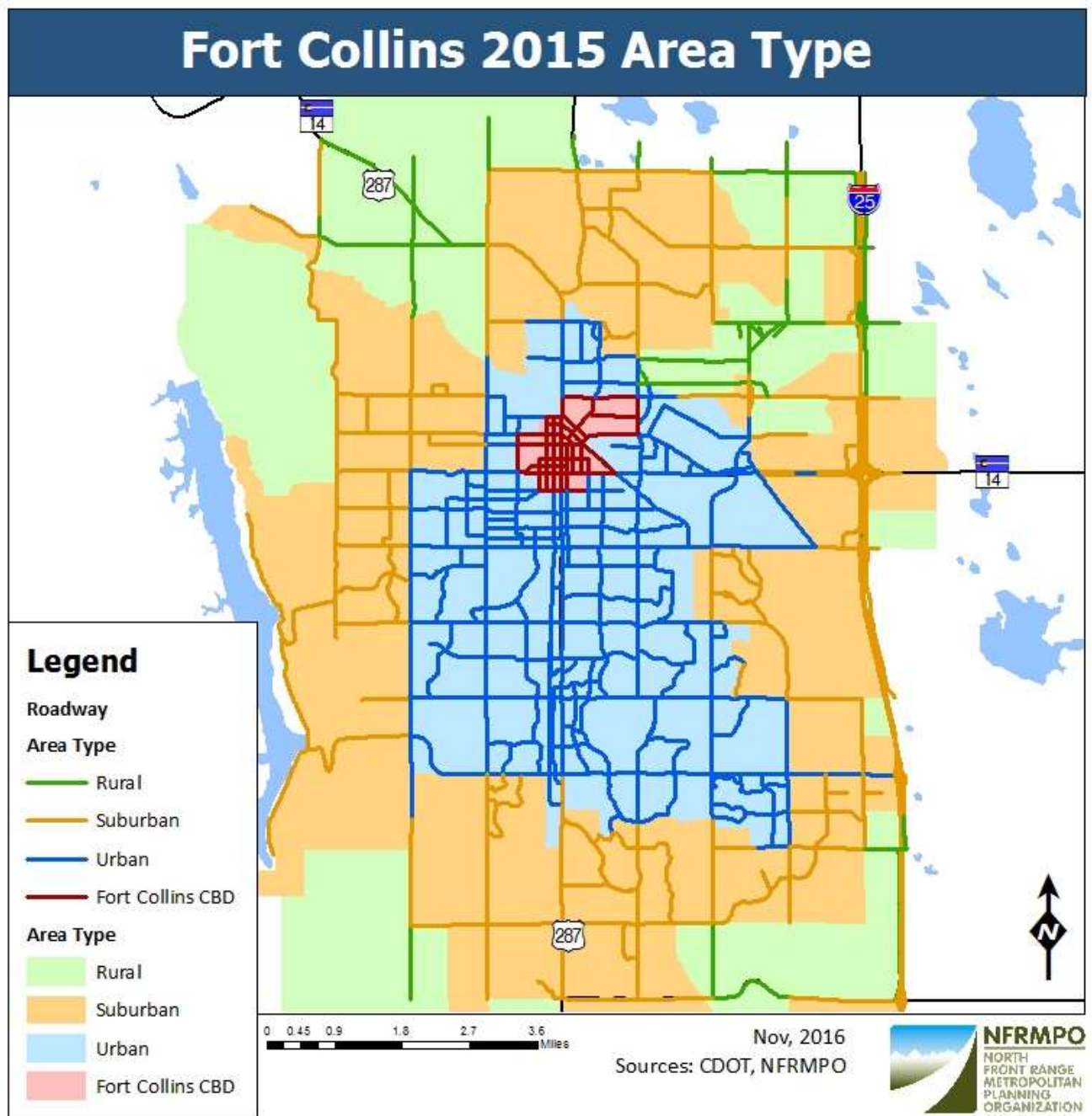
Census blocks were used to collect household size data, while census tracts were used to collect workers per household and income data. This data was grouped by TAZ for the Regional Travel Demand Model (RTDM). The household size, workers per household, and income data was used to determine the trip production rates, while the employment by type and for some trip purposes, total households, was used to determine the trip attraction rates.

Figure 2: Fort Collins 2015 Facility Type



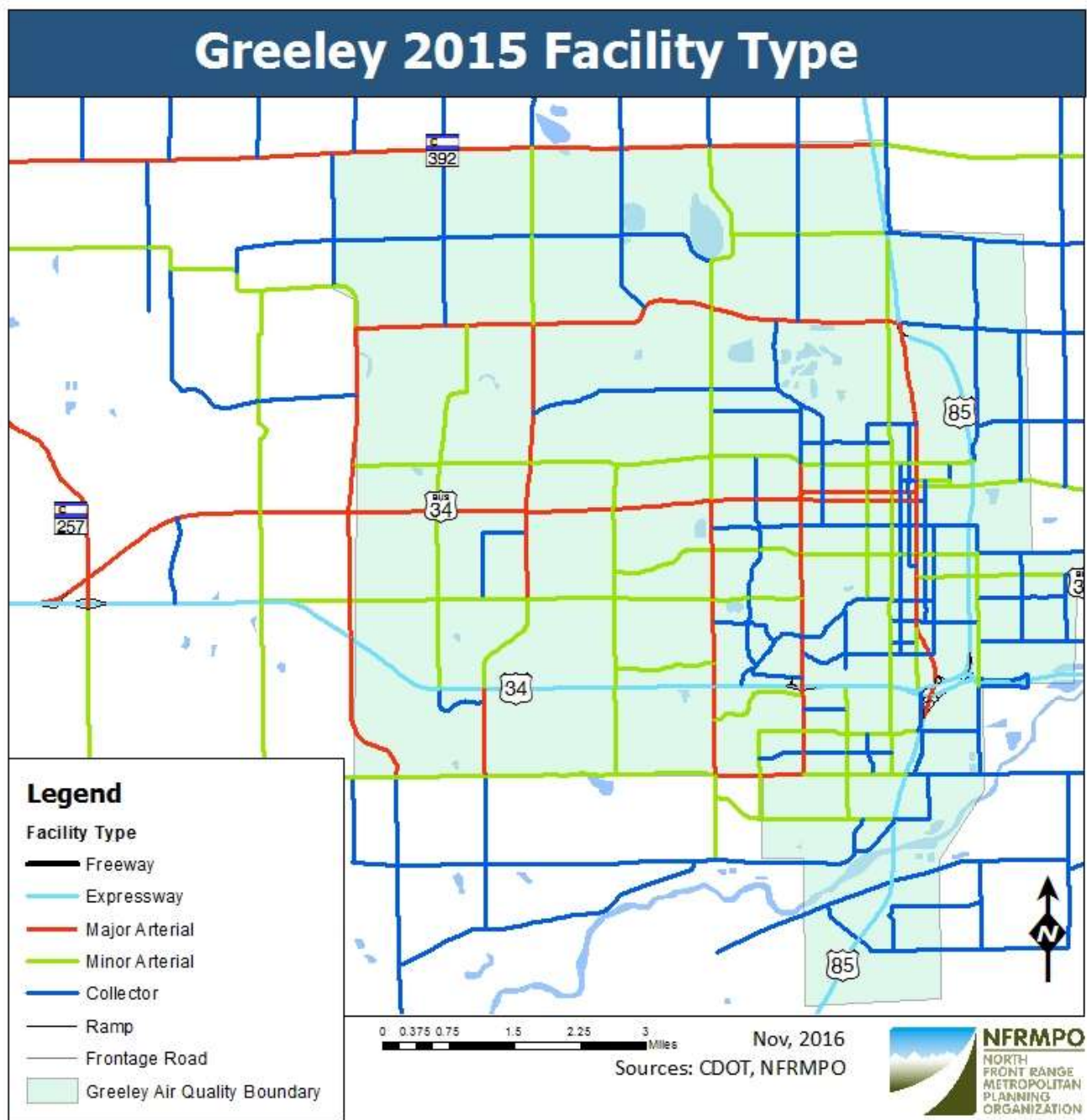
Source: 2040 NFRMPO Travel Demand Model Documentation, <http://nfrmpo.org/ResourcesDocuments/2040RTP.aspx>, 2015

Figure 3: Fort Collins 2015 Area Type



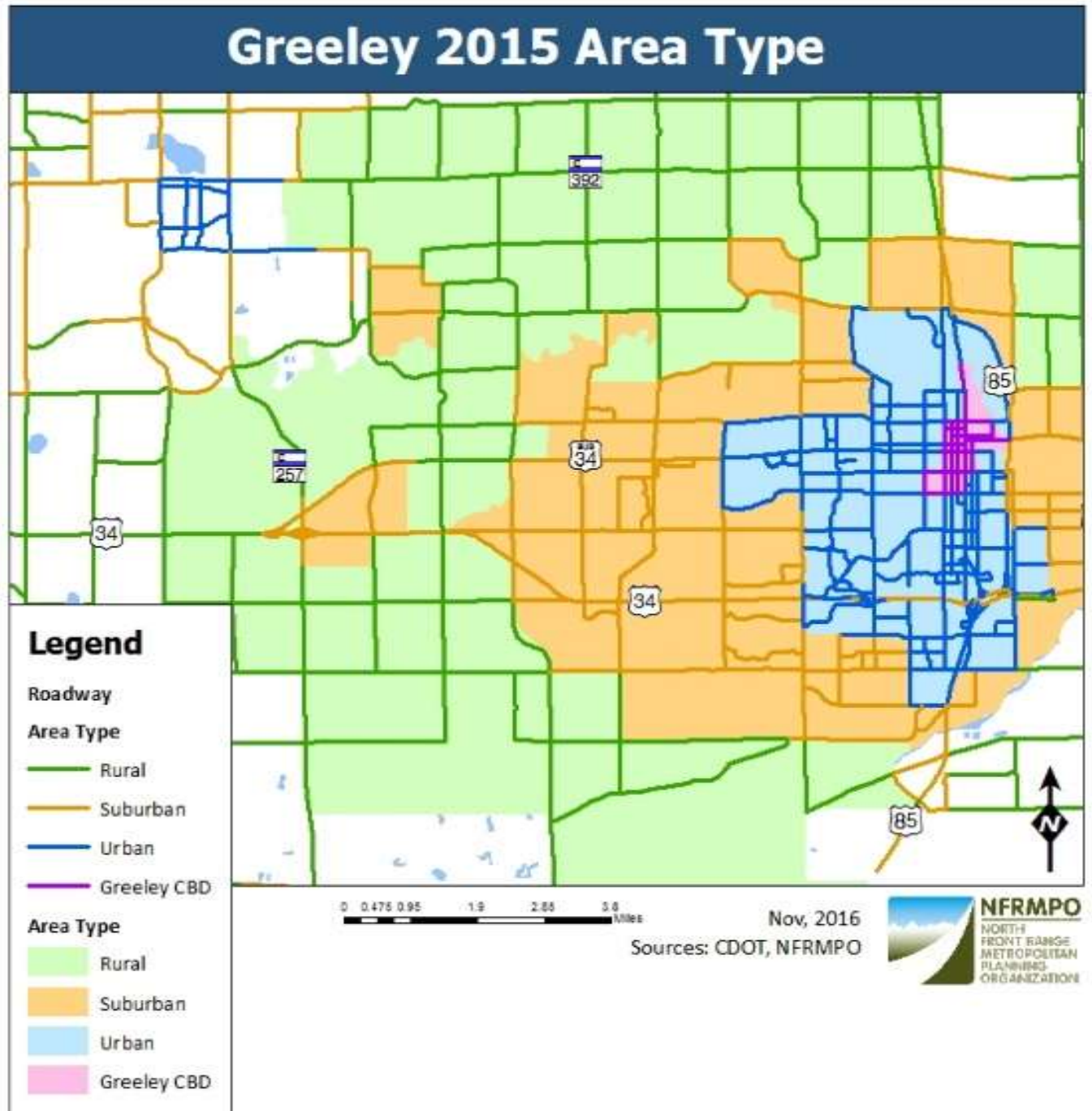
Source: 2040 NFRMPO Travel Demand Model Documentation, <http://nfrmpo.org/ResourcesDocuments/2040RTP.aspx>, 2015

Figure 4: Greeley 2015 Facility Type



Source: 2040 NFRMPO Travel Demand Model Documentation, <http://nfrmpo.org/ResourcesDocuments/2040RTP.aspx>, 2015

Figure 5: Greeley 2015 Area Type



Source: 2040 NFRMPO Travel Demand Model Documentation, <http://nfrmpo.org/ResourcesDocuments/2040RTP.aspx>, 2015

Projects in Model

Appendix E contains a list of projects included in the RTDM for air quality conformity. All the projects included are currently under construction, or will be built by the designated network year. All capacity improvements (widening) or regionally significant projects are included. Funding sources for these projects include federal funds (including TIGER), state funds (including Regional Priorities Program (RPP) and FASTER), local funds, and/or private funds. Projects not federally funded either have committed funds from a local jurisdiction or a private developer within the NFRMPO region.

Documentation of Changes to the Transportation Model

The NFRMPO used a 2012 base year RTDM, which incorporated results from the *NFRMPO Household Survey* completed in April 2010 and the *NFRMPO On-Board Transit Survey* completed in September 2009. The household survey was used to develop the trip generation rates, trip length frequency distributions, and auto occupancy rates. The transit survey was used in combination with the household survey to produce updated mode share targets. In addition, the model was revalidated with traffic count data collected between 2008 and 2013. The overall model structure was not changed.

Documentation of Changes to the Air Quality Model

APCD used the MOVES2014a model to estimate motor vehicle emission factors.

CHAPTER 3: MODEL OUTPUTS AND EMISSION TESTS

The transportation, land use, transportation modeling outputs, and air quality inputs for the future horizon years are summarized in **Appendices A and B**, for the Fort Collins and Greeley Maintenance Areas. **Appendices C and D** show the budgets for the Fort Collins and Greeley Maintenance Areas from the latest approved State Implementation Plan (SIP) for the staging years and the results of the conformity tests,² which passed for all years.

² 40 CFR 93.118, <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=6510ea8b0d1f191866069575d2f918a6&ty=HTML&h=L&mc=true&r=PART&n=pt40.20.93>, 2015

Appendix A: Carbon Monoxide Emissions Modeling Summary

Table 1: Fort Collins Modeling Summary		
	2015 (Base)	2040 (Horizon)
Socioeconomic Data (Fort Collins Area)		
Population	185,589	259,078
Employment	109,844	135,355
Households	70,857	99,959
Speed by Roadway Type		
Freeway	61.7	42.2
Expressway	32.3	20.6
Major Arterial	29.5	22.4
Minor Arterial	30.9	21.5
Frontage Road	44.6	31.3
Collector	28.0	22.7
Ramp	20.3	6.8
Centroid Connector	24.9	24.9
Average	31.2	23.5
Daily VMT Summaries		
Freeway	388,988	659,726
Expressway	411,730	608,296
Major Arterial	1,187,851	1,729,475
Minor Arterial	557,984	946,296
Frontage Road	17,628	67,848
Collector	276,838	602,512
Ramp	16,006	28,712
Centroid Connector	366,888	598,166
Total	3,225,475	5,241,031
Lane Miles by Roadway Type		
Freeway	36	43
Expressway	46	49
Major Arterial	203	227
Minor Arterial	168	173
Frontage Road	14	14
Collector	163	178
Ramp	4	4
Centroid Connector	266	266
Total	899	953
Source: NFRMPO 2040 Regional Travel Demand Model, 2040 Regional Socioeconomic Forecast		

Table 2: Greeley Modeling Summary		
	2015 (Base)	2040 (Horizon)
Socioeconomic Data		
Population	127,044	223,091
Employment	74,862	115,059
Households	48,503	86,680
Speed by Roadway Type		
Freeway	-	-
Expressway	43.1	32.8
Major Arterial	36.5	29.5
Minor Arterial	32.1	25.1
Frontage Road	-	-
Collector	29.2	27.0
Ramp	28.2	23.8
Centroid Connector	24.9	24.9
Average Total	33.6	27.7
Daily VMT Summaries		
Freeway	0	0
Expressway	430,102	667,461
Major Arterial	510,051	942,490
Minor Arterial	526,240	965,470
Frontage Road	0	0
Collector	133,592	348,744
Ramp	11,042	17,731
Centroid Connector	245,449	447,157
Total	1,856,476	3,390,052
Lane Miles by Roadway Type		
Freeway	0	0
Expressway	75	75
Major Arterial	124	138
Minor Arterial	189	204
Frontage Road	0	0
Collector	159	161
Ramp	5	5
Centroid Connector	129	129
Total	681	711
Source: NFRMPO 2040 Regional Travel Demand Model, 2040 Regional Socioeconomic Forecast		

Appendix B: CO Emissions Tests (Tons per Day)

Table 3: Fort Collins CO Emissions Test (Tons per Day)						
	SIP Budget	2017	2023³	2025	2035	2040
Carbon Monoxide (CO)	94	32.12	24.59	22.07	12.63	12.43
Pass/Fail		PASS	PASS	PASS	PASS	PASS

Table 4: Greeley CO Emissions Test (Tons per Day)						
	SIP Budget	2017	2019⁴	2025	2035	2040
Carbon Monoxide (CO)	60	20.57	19.25	15.29	9.10	9.24
Pass/Fail		PASS	PASS	PASS	PASS	PASS

³ Socio-economic and vehicle travel data were interpolated for 2023 (for Fort Collins) and for 2019 (for Greeley) between the 2015 and 2025 model years in the regional travel model. The emissions test was run for these interpolated years, per 40 CFR 93.118(d)(2).

Appendix C: NFRMPO Regional Travel Demand Model Projects

Figure 6: Map of NFRMPO Regional Travel Demand Model Projects

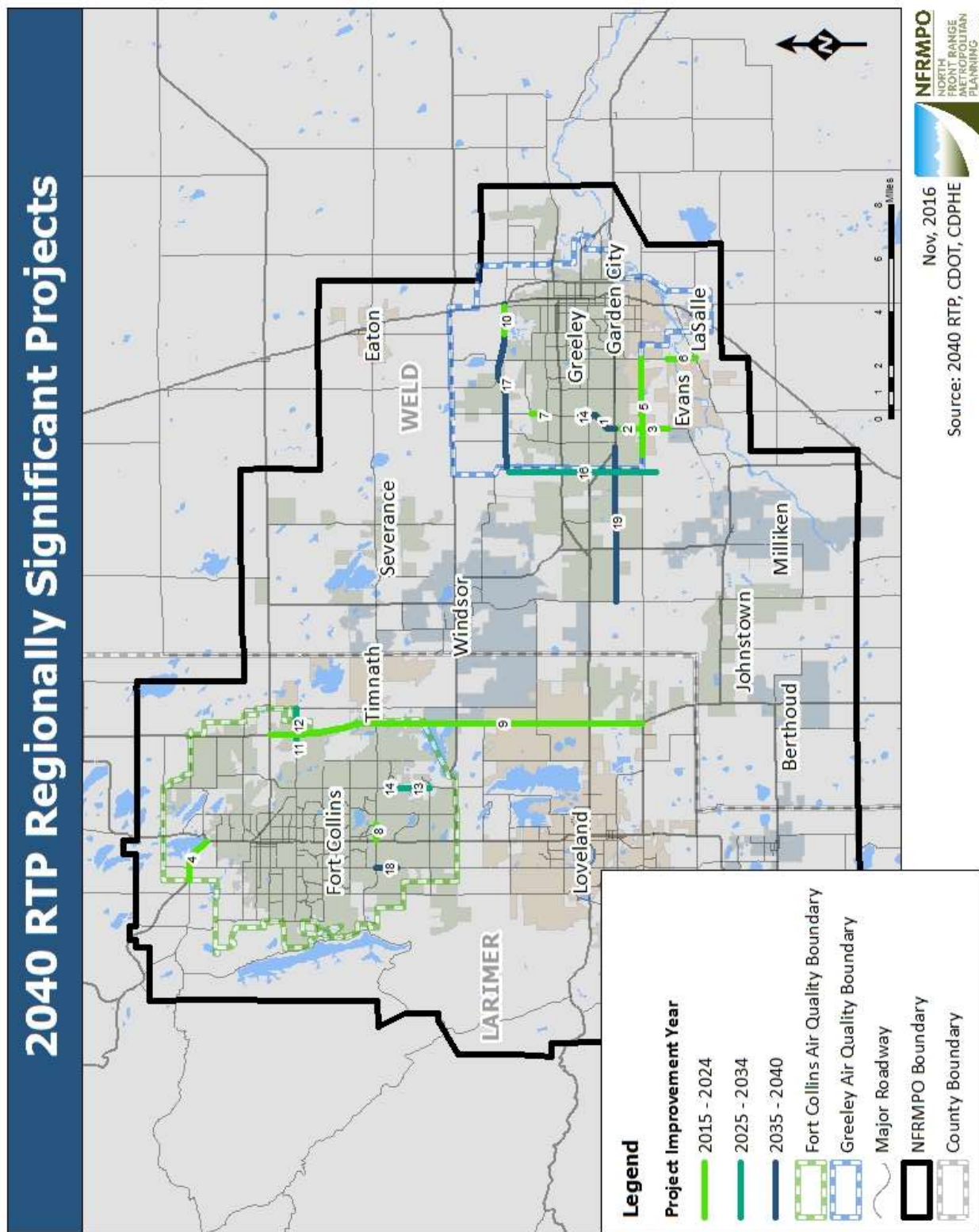


Table 5: List of NFRMPO Regional Travel Demand Model Projects

Map #	Street Name	From	To	Description of Improvement		Year of Improvement	Cost (thousands)	Funding Source
				Before	After			
2015-2024 Network								
1	59th Avenue	20 th Street	US 34 Bypass	2	2 (Center turn lane)	2015	\$1,500	Greeley – Capital Improvement Program
2	65th Avenue	US 34 Bypass	Weld CR 54	2	4	2015	\$3,000	Greeley – Road Development Funds
3	65th Avenue	37 th Street	49 th Street	2	4	2016	\$1,000	Evans – Capital Projects Street Fund Future Development
4	US 287	Shields Street	LaPorte Bypass	2	4	2016	\$22,000	CDOT – FASTER Safety/RAMP
5	37th Street	35 th Avenue	Two Rivers Parkway	2	4	2018	\$1,500	Evans – Capital Projects Street Fund Future Development
6	35th Avenue	49 th Street	Weld CR 35 & Weld CR 394	0	4	2020	\$1,500	Evans – Capital Projects Street Fund Future Development
7	59th Avenue	4 th Street	C Street	2	4	2020	\$2,400	Greeley – Road Development Funds
8	Harmony Road	College Avenue	Boardwalk Drive	4	6	2020	\$9,349	Fort Collins – Street Oversizing Fund, Developer Contribution, Sales Tax

Table 5: List of NFRMPO Regional Travel Demand Model Projects

Map #	Street Name	From	To	Description of Improvement		Year of Improvement	Cost (thousands)	Funding Source
				Before	After			
2015-2024 Network (Cont.)								
9	I-25	SH 402	SH 14	4	6	2020	\$250,000	CDOT – Regional Priority Program, FASTER, Surface Treatment, TC Contingency, HPTE, Strategic Transit, RoadX, Strategic Funds; Federal – FAST Freight State Allocation, TIGER; Local Funds; Private Funds; Flexible Funds – RTP, Other STBG, CMAQ; Tolling Revenue
10	O Street	11 th Avenue	Weld CR 37	2	4	2021	\$7,222	STBG; Greeley – Road Development Fund; Weld County – General Fund; Adjacent Developers
2025-2034 Network								
11	Prospect Road	Summit View Drive	I-25	2	4	2025	\$7,500	Fort Collins – Street Oversizing Fund, Developer Contribution, Sales Tax
12	Prospect Road	I-25	Growth Management Area Boundary	2	4	2025	\$3,000	Fort Collins – Street Oversizing Fund, Developer Contribution, Sales Tax
13	Timberline Road	Trilby Road	Kechter Drive	2	4	2025	\$15,000	Fort Collins – Street Oversizing Fund
14	Timberline Road	Kechter Drive	Stetson Creek Drive	2	4	2025	\$7,755	Fort Collins – Street Oversizing Fund, Developer Contribution, Sales Tax

Table 5: List of NFRMPO Regional Travel Demand Model Projects

Map #	Street Name	From	To	Description of Improvement		Year of Improvement	Cost (thousands)	Funding Source
				Before	After			
2035-2040 Network								
15	59 th Avenue	US 34 Bypass	20 th Street	2	4	2035	\$3,500	Greeley – Road Development Funds
16	83 rd Avenue	Weld CR 54	Weld CR 64	2	2 (Center turn lane)	2035	\$7,000	Greeley – Road Development Funds
17	O Street	SH 85	83 rd Avenue	2	2 (Center turn lane)	2035	\$4,700	Greeley – Road Development Funds
18	Shields Street	Fossil Creek Drive	Harmony Road	2	4	2035	\$6,500	Fort Collins – Street Oversizing Fund
19	Weld CR 56	US 34 Bypass	Weld CR 17	0	2	2035	\$21,000	Greeley – Road Development Funds

***Appendix D: Resolution 2017-01 North Front Range Transportation & Air Quality
Planning Council (NFRT&AQPC) Adoption***



REVISED
RESOLUTION NO. 2017-01
OF THE NORTH FRONT RANGE TRANSPORTATION & AIR QUALITY PLANNING COUNCIL
ADOPTING CONFORMITY REDETERMINATIONS
FOR THE NORTH FRONT RANGE METROPOLITAN PLANNING AREA 2040 FISCALLY
CONSTRAINED REGIONAL TRANSPORTATION PLAN AMENDMENT
AND THE FY2018-2021 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)
AND FOR THE NORTHERN SUBAREA OF THE UPPER FRONT RANGE TRANSPORTATION
PLANNING REGION 2040 REGIONAL TRANSPORTATION PLAN, THE FY2016-2019 TIP, THE
2040 UPPER FRONT RANGE TRANSPORTATION PLANNING REGION RTP, AND COLORADO
FY2017-2020 STATEWIDE TRANSPORTATION IMPROVEMENT PROGRAM

WHEREAS, 49 CFR PART 613 §450.324 requires development through continuing, cooperative, and comprehensive (“3C”) multimodal transportation planning process of a fiscally constrained Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP) for Metropolitan Planning Organizations (MPOs); and

WHEREAS, the Planning Council as the MPO is the agency responsible for developing and amending the RTP and TIP; and

WHEREAS, portions of the cities of Fort Collins and Greeley are currently designated as maintenance areas for carbon monoxide (CO) for which the Planning Council performs conformity determinations; and

WHEREAS, the Planning Council through a Memorandum of Agreement (MOA) (2008) has agreed to perform ozone conformity determinations for the Northern Subarea of the Denver-North Front Range 8-hour ozone nonattainment area which includes portions of Larimer and Weld counties outside the MPO contained in the Upper Front Range Transportation Planning Region (UFRTPR); and

WHEREAS, Section 93.110(a) of the conformity rule requires conformity determinations based on the most recent planning assumptions in force at the time of conformity analysis; and


WHEREAS, the planning assumptions for the Northern Subarea were updated prior to conformity analysis, updating from forecast year 2035 to 2040; and

WHEREAS, the air quality conformity redeterminations conducted on the MPO’s fiscally constrained 2040 RTP Amendment, the FY2016-2019 TIP, FY2018-2021 TIP, and the Colorado FY2017-2020 Statewide TIP (STIP) using the 2040 planning assumptions were within the federally approved emissions budgets; and

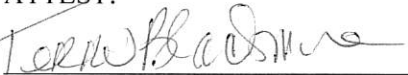
WHEREAS, the Planning Council received no public comment opposing the finding of conformity during the public comment period or during the public hearing;

NOW, THEREFORE, BE IT RESOLVED BY North Front Range Transportation & Air Quality Planning Council, the fiscally constrained 2040 RTP Amendment, the FY2016-2019 TIP, FY2018-2021 TIP, the 2040 Upper Front Range, and the Colorado FY2017-2020 STIP conform to the State Implementation Plan (SIP) demonstrating positive air quality conformity redeterminations.

Passed and adopted at the regular meeting of the North Front Range Transportation & Air Quality Planning Council held the 2nd day of March, 2017.



Kevin Ross, Chair

ATTEST:


Terri Blackmore, Executive Director

Appendix E: Colorado Air Quality Control Commission Conformity Concurrence



COLORADO
Air Quality Control Commission
Department of Public Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

Ms. Terri Blackmore, Executive Director
North Front Range Metropolitan Planning Organization
419 Canyon Avenue, Suite 300
Fort Collins, CO 80521

December 15, 2016

The Colorado Air Quality Control Commission (AQCC) has reviewed your agency's conformity determinations for its Regional Transportation Plan and FY2018-2021 Transportation Improvement Program (TIP). The AQCC agrees that the North Front Range Metropolitan Planning Organization's (NFRMPO) 2040 Fiscally Constrained Regional Transportation Plan Amendment, FY 2018-2021 TIP, the Upper Front Range's (UFR) 2040 Regional Transportation Plan, and the NFRMPO portion of the Colorado FY 2017-2020 Statewide Transportation Improvement Program (STIP), as of December 15, 2016, conform to the State Implementation Plan (SIP) and emissions budgets for ozone precursors and carbon monoxide.

The North Front Range Metropolitan Planning Organization's and the Air Pollution Control Division's analyses indicate that emissions budgets for these pollutants will not be exceeded in any of the project or plan horizon years. Therefore, the AQCC concurs with this conformity determination.

Should you have any questions regarding the AQCC's action, please contact Paul Lee at the APCD, at 303-692-3127 or at paul.lee@state.co.us.

Sincerely,

John Clouse, Chair
Air Quality Control Commission

Cc: Tim Russ, U.S. EPA, Region 8
Bill Haas, FHWA
Steve Cook, DRCOG
Rose Waldman, CDOT
Paul Lee, APCD



Appendix F: U.S. Department of Transportation Conformity Finding



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

March 3, 2017

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000

Terri Blackmore
Executive Director, NFRMPO
419 Canyon Avenue, Suite 300
Fort Collins, CO 80521

Subject: Conformity Determination for the NFRMPO 2040 RTP Amendment and Amended 2016-2019 TIP

Dear Ms. Blackmore:

In accordance with the Clean Air Act of 1990, as amended, and 23 CFR 450, the U.S. Department of Transportation (USDOT) is required to make air quality conformity determinations of Regional Transportation Plans (RTP) and Transportation Improvement Programs (TIP) in non-attainment and maintenance areas. Consistent with the Federal Highway Administration (FHWA)/ Federal Transit Administration (FTA) Region 8 Memorandum of Agreement for Transportation Planning Oversight (MOA), the FHWA Colorado Division office signs the letter on behalf of FTA Region 8.

The North Front Range Metropolitan Planning Organization (NFRMPO) adopted an air quality conformity determination for the Fort Collins and Greeley urbanized areas for the 2040 RTP Amendment, as well as for the northern subarea of the Upper Front Range Transportation Planning Region (Upper Front Range TPR) 2040 RTP and the portion of the 2017-2020 State Transportation Improvement Program within the Upper Front Range region on February 2, 2017. On March 2, 2017, NFRMPO adopted a conformity determination for the Amended 2016-2019 TIP. The NFRMPO adopted both conformity determinations in its capacity as the Metropolitan Planning Organization.

Based on our evaluation of the NFRMPO 2040 RTP Amendment and Amended 2016-2019 TIP conformity determinations, in coordination with the EPA, the Denver Regional Council of Governments, the NFRMPO, the Colorado Air Quality Control Commission, the Regional Air Quality Council, and the Colorado Department of Transportation, we have determined that Fort Collins and Greeley urbanized areas have met the requirements of 40 CFR 51 and 93, 23 CFR 450, and 49 CFR 613 along with FHWA/FTA policies and guidance. Furthermore, the NFRMPO conformity determination is consistent with the 2008 DRCOG/NFRMPO 8-Hour Ozone MOA.

A conformity determination for the NFRMPO 2040 RTP Amendment and Amended 2016-2019 TIP is hereby made. We are also making a conformity determination for the northern subarea of the Upper Front Range TPR 2040 RTP and the Upper Front Range portion of the 2017-2020 State Transportation Improvement Program. This conformity determination does not restart the clock for conformity for either the NFRMPO Amended 2040 RTP or the Amended 2016-2019 TIP. Our action is consistent with the FHWA/FTA Transportation Planning MOA.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Cater". The signature is stylized with a large initial "J" and a long horizontal stroke.

John M. Cater, P.E.
Division Administrator

cc: Doug Rex, DRCOG
Barbara Kirkmeyer, Upper Front Range TPR
Paul Lee, APCD
Marissa Gaughan, CDOT
Tim Kirby, CDOT
Larry Squires, FTA
Ranae Tunison, FTA
Tim Russ, EPA