CITY OF FORT COLLINS AIR QUALITY ACTION PLAN UPDATE MARCH 1996

PROGRESS REVIEW OF AIR QUALITY DATA PROGRESS REVIEW OF '94-'95 ACTIONS UPDATED ACTION PLAN FOR '96-'98

The purpose of this update is to provide:

O A summary of the most current data pertaining to those pollutants of particular concern to Fort Collins, and where applicable, how these data have been affected by the Air Quality Action Plan;

O Current information on the Strategies adopted by Council in March 1994; and;

O Strategies for implementation from May 1996 through December 1998.

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AIR QUALITY PLAN OVERVIEW The Air Quality Policy Plan, adopted by City Council in March 1993 provides the framework for the City's Air Quality Program. The Policy Plan calls for an Action Plan to be reviewed and updated every two years. The first Action Plan was adopted in March 1994. This is the first two-year review.

Policy Plan, 1993	Action Plan, 1994	Two-Y 1996	lear Review,
< Long-term guidance	< Implement short-term action strategies	< <	Evaluate progress Revise Action Plan

The Policy Plan also includes the following guidance, which is repeated here to orient and assist the reader of this Action Plan update.

OOne goal: Continually improve Fort Collins Air Quality as the City grows. This means existing sources must be reduced to more than offset new growth.

OSeven objectives: Reduce the growth of vehicle miles of travel; reduce per-mile tailpipe emissions of high priority pollutants; reduce total emissions of high priority pollutants from commercial and industrial sources; reduce area-wide wood smoke emissions; reduce the number of non-certified wood stoves and conventional fireplaces; and increase the percentage of residences and workplaces taking action to reduce exposure to indoor air pollution.

OProgress measurement: Use air quality indicators (example -- miles driven per day), not just ambient air quality data. "Indicators" are indirect measurements of air quality that focus on the parts of the problem within our control, whereas ambient data include issues outside our control, such as the effects of weather.

OFocus on sources, not pollutants: Action strategies aim at reducing all emissions from a source category (e.g., motor vehicles) rather than at specific pollutants (e.g., carbon monoxide).

OPriority for action is based on the amount of pollution generated by a source. Current priority sources in order of importance: #1 motor vehicles, #2 commerce and industry, #3 homes

OPriority for achieving goals is based on the following hierarchy of actions: #1 actions the City must take, #2 actions the City takes voluntarily to reduce emissions from its own operations, #3 actions the City asks others to take (education, incentives), #4 actions the City requires others to take (ordinances).

Ambient Air Quality Data Summary

Carbon Monoxide is caused mainly by motor vehicles. It has decreased nation-wide, primarily because of new car emissions technologies, oxygenated fuels, and the State inspection and maintenance program.





Particulate pollution comes mainly from wood burning, wind-blown dust, and street sanding. Reduction in wood burning units, and advanced sanding and sweeping techniques have helped reduce particulate pollution.

Ozone near the ground, as opposed to stratospheric ozone, is a pollutant caused by the "cooking" of oxides of nitrogen and hydrocarbons under the hot sun of summer. These emissions are mainly produced by automobiles and industry. It is unclear why surface ozone has remained fairly "flat" over time. Ozone shows a neutral trend put within to a co y R⁻ within the standard co y S⁻ withint

Fort Collins visibility 10/93 to 11/95 was worse than Colorado standards 28% of the time



Visibility, which tells us how the air "looks", has been monitored in Fort Collins since 1993. During that time we exceeded the State Visibility Standard nearly one-third of the year. The length of monitoring is not yet sufficient time to establish a trend, so we do not know if visibility is improving or deteriorating.

Objective#1: Reduce Daily Vehicle Miles Traveled (VMT)

Current Conditions

The dotted line shows VMT has been increasing 3.6% per year (faster than population growth, projected at 2.8% per year). The solid line shows the expected improvement if VMT goals are met through implementation of the various transportation plans.



Actions

Strategies: 1994 - 1995	Strategies: 1996 - 1998			
1. Transportation Plan	ning and Implementation			
OR egional Transportation Plan:		96	97	<u>98</u>
Adopted objective, to reduce drive-alone trips	$\boldsymbol{\varnothing}$ Continue implementation.	ļ	ļ	!
10% by 2015. Guides further implementation. <i>OCongestion Management Plan:</i>				
Adopted policy, to limit VMT growth to the				
population growth rate. Guides further planning.	Ø Continue implementation.	i	i	i
OMaster Transportation Plan (in				
preparation):				
Includes level-of-service criteria for transit,				
cycling, walking & transit, transportation, facility	Complete and implement			
design standards for all modes, and review procedures for traffic from new developments.	Ø Complete and implement.	:	:	:
OTransportation Demand Management				
Program (in preparation):				
Includes "mobility report card" to track progress,				
"SmartTrips" marketing program for alternative				
transportation, and employer-based				
transportation coordinators.	$\boldsymbol{\varnothing}$ Complete and implement.	i	i	!
OTransit Development Plan:				
Increases transit services and ridership.				
	Complete and implement			
	Ø Complete and implement.			
		•	•	•

Strategies: 1994 - 1995	Strategies: 1996 - 1	1998		
1. Transportation Planning a	nd Implementation (continu	ıed)		
<i>OBicycle Plan:</i> Includes construction of bike facilities, improved design and maintenance of bike facilities, policy changes to support cycling, and active promotion of cycling .	Ø Continue implementation.	<u>96</u> !	<u>97</u> !	<u>98</u> !
<i>OPedestrian Plan (in preparation):</i> Includes improved design, connectivity, and maintenance of pedestrian facilities.	Ø Complete and implement.	ļ	ļ	ļ
2. Land Use Planning	g and Implementation			
<i>OCity Plan (in preparation):</i> Includes a visual preference survey (results support human-scale design to improve cyclist, transit and pedestrian experience), a community goals and vision statement, a structure plan for compact urban growth, with activity centers, mixed land use, higher densities, and urban design standards to increase attractiveness of alternative modes, and a capital improvement program to support the structure plan. Area plans implement alternative-mode-friendly designs at the neighborhood level.	Ø Complete and implement.	<u>96</u> !	<u>97</u> !	<u>98</u> !
3. Internal	City efforts			
OLand Use, Transportation and Air Quality Team (LUTRAQ): Coordinates interdepartmental efforts within City planning and operations.	Ø Continue.	<u>96</u> !	<u>97</u> !	<u>98</u> !
<i>OCity Don't Drive One in Five Program:</i> Annual program to increase use of alternative transportation among City employees.	Ø Continue. Increase commitment of resources to make it an exemplary program. Natural Resources Department to assist Multi-modal Transportation Group.	!	!	ļ

Objective #2: Reduce Per-mile Motor Vehicle Emissions

Current Conditions



***Per-mile emissions** refer to any air pollution caused by movement of a motor vehicle, and includes exhaust pipe emissions and road dust kicked up by automobile tires.

Actions

Strategies: 1994 - 1995	Strategies: 1996 - 1998				
1. Emissions Sticker Ordinance					
<i>O Emissions Test Law:</i> Adopted State emissions test law into City Code in 1994 to simplify enforcement city-wide, and to increase compliance among CSU students. Overall compliance has risen from 75% to 85%. City initiated program in cooperation with CSU Parking Services.	Ø Continue working with CSU students and Parking Services. Turn over enforcement to CSU by spring 1998.	<u>96</u> !	<u>97</u> !	<u>98</u> !	
2. Education on Emiss	sion Sticker Ordinance				
OInformation Campaign: Conducted information campaigns on the CSU campus for last three years. Campaigns included posters, letters to campus residents, coupons for discounts on tests, warning tickets, articles in the <i>Coloradoan</i> , and information with parking permits.	Ø Continue to assist CSU with information campaign through spring 1998.	<u>96</u> !	<u>97</u> !	<u>98</u> !	

Strategies: 1994 - 1995	Strategies: 1996 - 2	1998		
3. Emissions Te	sting and Repair			
 OImproved Inspection & Maintenance (I/M) Program: Design a program to fit Fort Collins; adopted by the North Front Range Transportation & Air Quality Planning Council (NFRT&AQPC) to devise a regional program. Status: Project is on hold until more data are available from Denver enhanced program and there is a clearer understanding of legislative intent at the federal and state levels. 	 Convene a committee of Fort Collins experts to recommend early action on non-testing I/M issues, e.g., public information, incentives, remote sensing, and mechanic training. Convene an I/M study committee under the auspices of the NFRT&AQPC to recommend an improved local/regional program, considering both testing and non-testing issues. 	<u>96</u> !	<u>97</u>	<u>98</u>
4. Alternative Fu	el Vehicles (AFV)			
OCity Takes Leadership Role: As of January 1996, the City had 103 AFVs.	ØExpand the City AFV fleet by 25 vehicles each year	<u>96</u> !	<u>97</u> !	<u>98</u> !
ORegional Partnership - "Clean Cities" The City of Fort Collins coordinated an AFV program with Weld and Larimer counties and Rocky Mountain National Park (Weld/ Larimer/RMNP) to promote use of alternative fuels by fleets and to seek a Clean Cities designation from the U. S. Department of Energy.	through 2001. Continue to coordinate the Weld-Larimer-RMNP Clean Cities partnership. Develop a monitoring program to track the emissions-reduction impacts of AFVs in private and public fleets. Work with other cities to strengthen a "Clean Fuels" corridor between Colorado Springs and the Wyoming border.	!	!	!

Strategies: 1994 - 1995	Strategies: 1996 -	1998		
5. Street Sandin	g and Sweeping			
OBest Management Practices The City Streets Department continues to use the state of the art techniques to reduce particulate emissions from street sanding. All of Streets staff have formal training in particulate pollution reduction.	 Continue to use advanced pavement treatments for ice and snow control. Increase the budget to sweep up sand more quickly after snow storms and to install a real-time monitoring system allowing use of liquid de-icers. Implement joint project with Larimer County to identify and reduce UGA street dust emissions, including sweeping paved roads and paving or controlling dust from unpaved roads. 	<u>96</u> !	<u>97</u> !	<u>98</u> !
6. Diesel	vehicles			
	 Increase enforcement of anti-smoking regulations for both diesel and gasoline vehicles. Eliminate unnecessary idling of diesel vehicles through education, or by ordinance if necessary. Evaluate options to enforce vehicle-related City and State air pollution laws. Make a recommendation to the City Manager. Participate in Task Force to reduce through truck traffic. 	<u>96</u>	<u>97</u> ! !	98

Objective #3: Prevent Total Motor Vehicle Emissions from exceeding Low Point

Current Conditions

Total daily motor vehicle emissions are estimated by multiplying daily vehicle miles traveled (see Objective #1) by per-mile emissions (see Objective #2). The figures below show per-mile and total emissions of carbon monoxide in Fort Collins. Other pollutants from motor vehicles include hydrocarbons, nitrogen oxides, particulate, and toxics.

Actions



If VMT growth is reduced to 2.6% per year...

This analysis assumes that the Transportation Plan goal for VMT growth is met, dropping levels from the current 3.6% down to 2.6% per year.

...and if technology cuts CO emissions to half of 1990 levels...

Emissions per mile are expected to drop due to federal new car standards and state inspection and maintenance and oxygenated fuels programs, and local use of alternative fuels. If a local inspection and maintenance program is implemented, emissions will drop further than shown.

...then total CO levels will meet our objective through 2009.

Although reduced VMT growth will still out-pace technological improvements after the year 2000, we will meet our objective, shown as a horizontal line, through 2009. Stricter new car standards or a local inspection and maintenance program, if adopted, would improve this picture.

Objective #4: Reduce Total Emissions from Commerce and Industry

Current Conditions

Commercial and industrial emissions are compiled in tons per day using State data in the Aerometric Information Retrieval System (AIRS). The chart at right shows emissions of high priority pollutants in tons per year. This is the first year the City has tracked this data, so trend information is not available.

Note 1 -- Nitrogen dioxide (NO₂) and volatile organic compounds (**VOC**) together contribute to the formation of ozone.

Commercial/industrial

emissions, TONS/YEAR



Note 2 -- Hazardous air pollutants (HAP) include chemicals like formaldehyde, benzene, hydrochloric acid, and hydrogen fluoride, which increase the chance of experiencing serious health problems, such as cancer and neurological diseases. Many HAP are also VOC.

Strategies: 1996 - 1	1998		
revention (P ₂)			
	<u>96</u> !	<u>97</u> !	<u>98</u> !
e w A pin ta la pa e a p	Continue current program, working with the P_2 Technical Advisory Group to guide the rogram. Use emissions enventory data to strategically arget businesses that emit arge amounts of "high priority" collutants such as HAP, VOC, nd particulate .	96 <	96 97 96 97 96 97 <td< td=""></td<>

Strategies: 1994 - 1995	Strategies: 1996 -	1998		
2. New Sou	urce Review			
ONew Sources of Industrial/Commercial Emissions Determine whether or not to adopt emission reduction standards that go beyond State regulations for new commercial/industrial sources of emissions.	 Take an active role in the State permit review process, i.e., participate in regulatory revisions; assure the City is notified of each Air Pollution Emission Notice filed; and register local sources with the State health department that are not now registered. Prepare an issue paper on "How well does the State regulatory system work for Fort Collins." Provide information to the community on commercial and industrial air pollution. Evaluate State new source review regulations and determine whether the City needs to adopt development review requirements that go beyond State rules. If so, then amend City land development regulations. 	<u>96</u> !	<u>97</u> ! !	<u>98</u>
3. Fugi	tive Dust			
<i>OFugitive Dust Law</i> Work with the City Storm Water Utility and Engineering Department and Larimer County Health Department on procedures to ensure compliance with State and City dust control laws, to reduce surface erosion and wind-blown dust for nearby inhabitants.	Ø Complete and implement	<u>96</u> !	97	98

Objective #5: Reduce wood smoke emissions, and Objective #6: Reduce the Number of Non-certified Wood Stoves and Conventional Fireplaces

Current Conditions

This chart shows the decline in carbon monoxide emissions from wood burning. This change is due to conversion of wood burning fireplaces to gas, the dismantling or upgrade of old, dirty-burning wood stoves to new, certified units, and a declining trend in solid fuel usage. CO emissions from wood burning have decreased by 54% since 1985, based on surveys of area residents.





Fort Collins' ZILCH program, wood smoke complaint line, and information program may be credited with having an additional effect on wood burning emissions, with a steady decline in the number of wood burning fireplaces and older, noncertified wood stoves since the programs began in 1990.



Acti	ions			
Strategies: 1994-1995	Strategies: 1996 - 19	98		
1. ZILCH - Zero Interest Lo	oans for Conservation Help			
OProgram: Z ero interest loans are provided to Fort Collins residents to help them convert wood burning fireplaces to gas, or upgrade or dismantle non-certified wood stoves to a cleaner-burning, certified units. The repayment schedule and loan cap were reduced to make payback quicker and loans more available. Over 200 wood burning units have been upgraded or dismantled since the program began in 1990. OLoan Fund:	Ø Continue the ZILCH program. Maintain current repayment schedule and re-evaluate biennially to ensure it is compatible with market prices.	<u>96</u> !	<u>97</u> !	<u>98</u> !
The revolving loan fund is capped at \$90,000. Money is reloaned as it is paid back. <i>OWood Smoke Survey</i> : A wood smoke survey was conducted in April 1995 to determine the number of wood fireplaces and non- certified wood stoves, and to calculate wood smoke emissions, and citizen attitudes.	 Seek additional funding if demand for loans increases by 20%. Conduct another wood smoke survey in the spring of 1996 and then establish a biennial schedule coordinated with the Air Quality Action Plan review time-table. 	ļ		
2. Clean Wood bu	urning Education			
OSeasonal effort (September through March): Encourage clean wood-burning techniques, and fireplace/stove upgrades through articles in <i>Environmental News</i> and the <i>Coloradoan</i> , weekly reports on City Line, KCSU radio, and the wood smoke complaint telephone line.	ØContinue education program, complaint line, media outreach, and articles.	<u>96</u> !	<u>97</u> !	<u>98</u> !

3. Regulations				
		96	97	98
	$\boldsymbol{\varnothing}$ Adopt an ordinance requiring	ļ		
	that wood burning devices be			
	upgraded to low-polluting units			
	when a home is sold.			
	Ø Make minor changes in current	i		
	ordinances on new wood burning			
	units and use of cottonwood.			

Objective #7: Increase Indoor Air Quality (IAQ) Actions



Current Conditions

Since 1994 when the IAQ information program began, actions taken to reduce exposure to carbon monoxide (CO) and radon have increased, while actions to reduce exposure to tobacco smoke have remained neutral. The IAQ program has focused on radon and CO.

The charts on this page reflect data from 1994 and 1995 IAQ surveys.

- * Residents who regularly have their furnaces checked.
- + Residents who do not allow anyone to smoke in their homes.
- # Residents who have had their homes tested for radon.

Since 1994, more residents have taken actions when radon levels exceeded 4 picocuries per liter of air (pCi/L), the level at which USEPA recommends action be taken. Fort Collins and most of Colorado are in a USEPA Zone 1 radon area where natural levels tend to be above 4 pCi/L.



More Actions Taken to Fix Radon Problems

Act				
Strategies: 1994 - 1995	Strategies: 1996 -	1998		
1. Indoor Air Qu	ality Issue Paper			
		96	97	98
	$\boldsymbol{\varnothing}$ Write an issue paper		ļ	
	outlining "who is doing what"			
	on indoor air quality in			
	government and private			
	sectors. Recommend an			
	appropriate role for the City			
	that complements, rather than			
	duplicates, the efforts of			
	others.			
	Problems and opportunities			
	to consider:			
	Whether to update the			
	tobacco smoke ordinance.			
	Pollution Prevention program			
	for households patterned after			
	Master Naturalist			
	Program. Workshops on do-			
	it-yourself radon mitigation.			
	Develop a computer model of			
	IAQ health risks by pollutant.			
	Discontinue IAQ strategy that focuses on the workplace.			
	Work through neighborhood			
	organizations to increase			
	awareness and actions relating			
	to IAQ. Provide public			
	workshops on air toxics.			
	workshops on an wates.			

Actions

Strategies: 1994 - 1995	Strategies: 1996 - 1998				
2. IAQ Survey					
 11994 and 1995: Surveys were conducted in the summer of 1994 and winter of 1995 to determine residents' knowledge of specific IAQ issues and whether they were taking appropriate actions to reduce exposure to indoor air pollutants. The results of the 1994 survey were used to develop an outreach/information program. The 1995 survey was used to measure the success of the current program and to ask residents about additional IAQ issues. Results were used to refocus the IAQ program. 	Ø Continue a biennial survey schedule. Restructure survey based on recommendations of Issue Paper referenced in #1.	<u>96</u>	<u>97</u> !	98	
3. Reg	ulations				
	Ø Proposed Radon Ordinance: City ordinance requiring that newly- constructed homes be tested, and results provided to buyers.	<u>96</u> !	<u>97</u>	<u>98</u>	

Strategies: 1994 - 1995	Strategies: 1996 - 1998				
4. Indoor Air Quality (IAQ) Education and Information					
<i>OOverall Program:</i> Emphasis on radon, carbon monoxide and tobacco smoke initially. In 1996 expanded to include other IAQ issues such as formaldehyde, lead-based paint, asbestos, and other household toxics. Three workshops held dealing with IAQ, one in 1994, and two in 1995. <i>ORadonEducation Committee</i> :	Ø Continue as is until completion of Issue Paper referenced in #1 . Then, re- evaluate City's role and design program accordingly.	<u>96</u> !	<u>97</u> !	<u>98</u> !	
Made up of Realtors, radon inspectors, builders, citizens and City staff. Their goal is to increase the number of houses tested. Began by working with the real estate community to reach buyers at point-of-sale. Workshop held in November 1995 for fifty Realtors. A radon brochure is being developed, for use by the real estate community in particular, and as a general information tool for all homeowners, which will be completed April 1996. A radon booklet will be provided to fifth and sixth graders at four schools during the 1995 - 1996 school year. <i>OBuilding code changes</i> : Work with building departments in Fort Collins and Larimer County to provide radon abatement	Ø Continue unless directed differently by recommendations of Issue Paper referenced in #1 .	ļ	ļ		
specifications to builders.	Ø Work with the City building department to incorporate radon mitigation building standards into existing codes during the next building code review cycle.			ļ	

Supporting Policy Directions

This section deals with two actions: (1) those that strengthen our efforts to improve air quality; and, (2) those that provide the scientific basis by which we measure our success to allow for periodic resetting of goals and strategies:

Specific activities:

 Intergovernmental Partnerships at the state, county and city levels;
 Data collection and monitoring; and,
 Legislation.

Intergovernmental Partnerships

Strategies: 1994 - 1995	Strategies: 1996 - 1998			
1. City, County,	State Government			
1Liaisons: Liaison process initiated to annually coordinate air quality work plans of the City with County and State health departments, to increase effectiveness and avoid duplication of effort.	ØComplete and implement.	<u>96</u> !	<u>97</u>	<u>98</u>
2. Local G	overnment			
OReduce Risks From Air Toxics: Established an air toxics partnership with health officials from other cities, counties, and state and federal agencies, to reduce health risks from air	Ø Continue.	<u>96</u> !	<u>97</u> !	<u>98</u> !
toxics.	Ø Participate in "Local Government Environmental Staff," an ad-hoc Front Range group	ļ	ļ	ļ

Strategies: 1994 - 1995	Strategies: 1996 -	1998			
3. State Implementat	3. State Implementation Plan Update (SIP)				
ONon-Attainment Status: Fort Collins is designated "non-attainment" with respect to the federal carbon monoxide (CO) standard. Fort Collins has not violated the Federal air quality standard for CO since 1992.	© Review our choice of contingency measure, currently enhanced inspection and maintenance (Denver program), to be used if we unexpectedly violate the CO	96	97 !	<u>98</u> !	
	standard. Ø Decide whether or not to seek redesignation as an attainment area (certain federal transportation funds dry up if we redesignate). If so, complete redesignation request.			!	
4. Benchn	nark Study				
	Ø With the Air Quality Advisory Board, identify "first class" air pollution-control programs, and where applicable, apply their techniques to Fort Collins.	<u>96</u> !	<u>97</u> !	<u>98</u>	
5. Cities for Climate Protection Campaign					
	\varnothing Join with other cities to reduce greenhouse gas emissions, mostly CO ₂ from energy use. Adopt a resolution establishing a reduction target and develop a local action plan. \varnothing Implement the action plan.	<u>96</u>	<u>97</u> !	<u>98</u>	

Data Collection & Monitoring

Strategies: 1994 - 1995	Strategies: 1996 - 1998					
1. Action Plan Up	1. Action Plan Update (this document)					
<i>OReview:</i> Review monitored data and air quality indicators. Review implementation of strategies and propose future actions.	Ø Prepare 1998-2000 Action Plan Update	<u>96</u>	<u>97</u> !	<u>98</u> !		
2. Air Quality Monitoring Plan						
<i>O Current identified needs include:</i> Continue visibility monitoring, integrate visual and optical data Special source apportionment study of PM- 2.5, followed by regular PM-2.5 monitoring Reevaluate the permanent CO and PM-10 monitoring sites Study to determine if pollutants concentrate in valleys.	Ø Continue to update the air pollution monitoring strategy every two years	<u>96</u>	<u>97</u> !	<u>98</u> !		

Strategies: 1994 - 1995	Strategies: 1996 - 1998			
3. Edu	ication			
3. Edu O Air Quality Data Reporting: Report carbon monoxide, ozone, and visibility data in the Coloradoan and on channel 14, KCSU, and City Line (the City's information help line).	 Continue, and improve delivery of monitoring data to the public. Use pictures, not just data, to show visual air pollution levels. Simplify communication of air quality data and trends to increase awareness and encourage behavior change. Publicize A.Q. actions the City takes on its own. Survey residents to determine air quality awareness, effectiveness of information program, and basis 	<u>96</u> !	97 ! !	<u>98</u> !
	of public's concerns regarding air quality.			

Strategies: 1994 - 1995	Strategies: 1996 - 1998				
4. Special Monitoring Studies					
<i>O Visibility Monitoring:</i> The City's visibility monitoring site became operational in October 1993. The State Health Department has since taken over operation of the site.	Ø Continue	<u>96</u> !	<u>97</u> !	<u>98</u> !	
O PM-2.5 (particles smaller than 2.5 micrometers)	© Conduct a source apportionment study (one year) in cooperation with the North Front Range Air Quality Study created by HB 95- 1345, followed by continuing PM-2.5 monitoring. © Evaluate the location of the	!	i		
O Carbon Monoxide	permanent CO site relative to the changing traffic pattern over the next ten years.		ļ		

State Legislation

Strategies: 1996 - 1998			
lation			
Ø Monitor legislative actions. Respond where appropriate. (<i>The City has found it difficult, potentially time-consuming, and often ineffectual to successfully influence state legislation without a full-time lobbyist and full cooperation of other counties and municipalities.</i> <i>The City will therefore continue to follow pertinent legislation and join forces with other constituents where appropriate. We anticipate no major legislative efforts at this</i>	<u>96</u> !	<u>97</u> !	<u>98</u> !
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