



Environmental Services

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MEMORANDUM

DATE: July 30, 2014

TO: Budget Lead Team

CC: Lawrence Pollack, Budget and Performance Measurement Manager
Michael Beckstead, Chief Financial Officer
Ross Cunniff, Council Liaison to AQAB

FROM: Tom Moore, Chair
Air Quality Advisory Board

RE: 2015-2016 BFO Process and Proposed Offers

The Air Quality Advisory Board (AQAB) welcomes the opportunity provided by the City Council to provide input to the Budget Lead Team and inform the development of the 2015-16 budget that the Team will propose to the Council.

At our July 21, 2014 meeting, the AQAB reviewed the budget enhancement offers that we felt were the most likely offers to have an impact on air quality. The AQAB subsequently voted 6 to 0 to approve this memorandum to identify priority offers which we recommend the Budget Lead Team address and include as it develops a proposed budget.

To begin with, the AQAB believes that the entire budgeting process – and not just the review of specific budget enhancement offers – should proceed with an eye toward serious, ongoing air quality issues that substantially impact the health, economic well-being, and quality of life of Fort Collins residents, businesses, and visitors. The AQAB is concerned that air quality in Colorado’s northern Front Range, including in the City of Fort Collins, currently fails to meet National Ambient Air Quality Standards (NAAQS). In particular, air quality monitors within the City limits continue to register “exceedances” of the 75 parts per billion (ppb) NAAQS for ozone pollution (aka “smog”).

Although we believe City leaders are well aware of our city’s current “nonattainment” status for ozone pollution, they may not be aware that the United States Environmental Protection Agency (EPA) is under a court order to decide by December 1, 2014 whether to propose revisions to the Ozone NAAQS. EPA’s decision will be informed by the findings of an independent Clean Air Scientific Advisory Committee (CASAC). On June 26, 2014, CASAC sent a letter to the EPA Administrator advising EPA that, “based on the scientific evidence, a level of 70 ppb provides little margin of safety for the protection of public health... Thus, our policy advice is to set the level of the standard lower than 70 ppb within a range down to 60 ppb.”

The AQAB recognizes that ozone pollution is a regional problem that is not entirely caused by, and cannot be completely solved by, activities that occur in Fort Collins. However, given the strong evidence that the ozone standard which our City already exceeds is not protecting public health with an adequate margin of safety, and the distinct possibility that federal regulatory requirements may be made even more stringent in the future, the AQAB feels that the City of Fort Collins should refrain to the greatest possible extent from including in its budget any public investments or expenditures that will directly or indirectly increase air pollution, particularly the types of pollution that contribute to smog (e.g., motor vehicle emissions).

We recommend that the City enhance its investments in infrastructure and programs that directly or indirectly reduce air pollution. Foremost among those investments should be those that reduce emissions from the City's own infrastructure projects, equipment, and operations. We can't control everything, but it makes sense to control what we can. In particular, transportation-related actions which lead to fewer and cleaner motor vehicle trips will reduce ozone-forming emissions and reduce greenhouse gas emissions. The AQAB also wishes to express a strong preference for direct action over additional planning activities.

With those over-arching recommendations in mind, the AQAB offers its *support* for the following budget offers (sorted by offer #, not priority):

- **(8.1) Paved Recreational Trail Development:** These trails encourage greater use of bicycles as a transportation alternative and thus reduce emissions. It will also enable travel that exposes riders to less vehicle exhaust.
- **(17.1) KFCG Green Street Implementation Project:** The AQAB feels that the value of this approach is as yet unproven but is worthy of testing/demonstrating. If successful, it will encourage greater use of bicycles as a transportation alternative to vehicles and thus reduce emissions.
- **(25.1) Alleys Improvement Program:** This program would directly reduce fugitive dust emissions in densely developed neighborhoods.
- **(47.4) Healthy Sustainable Homes Program Expansion:** This program is a proven success and directly addresses indoor air quality, which can have even greater impacts on public health than outdoor air quality.
- **(47.11) Air Quality Program Support:** The AQAB has first-hand experience with the unforeseeable nature of air quality programs and appreciates the need for City staff to have more resources at their disposal to address urgent, unforeseen air quality issues without detracting from important planned and ongoing work.
- **(47.13) KFCG Municipal Energy Efficiency Fund:** The AQAB feels that this program is especially important because it can directly reduce emissions from buildings (mostly due to natural gas space heating), indirectly reduce power plant emissions by reducing electricity demand, and do so in a way that reduces the long term energy bills for City operations.

- **(47.16) Regional Air Quality Council:** Fort Collins needs to be part of regional air quality discussions. This is the forum for those discussions and we need to fund this to have a seat at the table.
- **(59.2) Utilities Community Renewables:** This is another example of our preference for action over planning. This offer would accelerate the deployment of renewables that can indirectly reduce emissions from regional fossil fuel power plants.
- **(63.6) 1.0 FTE - Program Manager, On-Street Pay Parking:** The AQAB feels that parking in congested parts of the City is provided as a public service but it should be paid for by users. Free parking encourages the use of vehicles for short trips that could be taken via alternative, less polluting modes of transportation.
- **(141.1) Transportation Air Quality Impacts Guidance Manual:** This has been a high priority for the AQAB for some time. When our Board hears presentations about transportation projects, the presenters are invariably unable to discuss the expected air quality impacts in anything other than vague, qualitative terms. We believe it is essential for City staff to develop the ability to assess transportation air quality impacts in a more rigorous and (ideally) quantitative way.

The items listed above were identified by the AQAB as high priority items. The Board at this time is not taking a position in support or opposition to any other budget offers.

If you have any questions concerning the AQAB's recommendations, please don't hesitate to contact me at 970.988.4055 or tmoore@westar.org. We appreciate the opportunity from the Council to provide input to the Budget Lead Team input and look forward to continued public discussion of the City's budget and priorities.