

FORT COLLINS AIR QUALITY PLAN

DECEMBER 2019

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Executive Summary

This 2019 update to the 2011 Air Quality Plan is meant to be a guiding document for City of Fort Collins policies and programs that support the protection of public health and the environment through improvement in outdoor and indoor air quality. For more than 25 years, the City of Fort Collins has been actively involved in addressing air pollution at a local level, and working regionally to address air pollution on a larger scale. Additionally, City and community efforts to combat climate change are closely related to air quality improvements, as many of the same sources that emit greenhouse gases also emit air pollutants, and a changing climate may adversely affect air quality.

Air pollution is a complex issue with many contributing factors, and pollution does not follow jurisdictional boundaries. While outdoor air quality in Fort Collins is generally perceived as good,¹ the City does not meet Federal healthbased air quality standards for ozone,² and our continuing growth as a community brings additional challenges related to air quality impacts from transportation and other human caused sources. To help ensure that efforts to continually improve air quality will succeed, it will be important to continue a local, regional, state and national dialogue which supports innovation and collaboration at all levels. Priorities in this plan look ahead to near-term (1-2 years) and longerterm (3-5 years) strategies and programs, focusing on efforts to:

- Continue ongoing work to reduce emissions, while identifying and implementing ways to quantify, measure and track air quality benefits of greenhouse gas source reductions, and other emission reduction strategies;
- Plan for ozone attainment, by working locally to reduce pollution from sources such as gas and diesel vehicles and engines, and collaborating regionally to decrease transported pollution, such as impacts from oil and gas operations;
- Increase opportunities for community members to identify and manage pollutant sources in their homes and businesses, while leveraging potential air quality benefits of energy efficiency improvements; and
- Prepare for air quality impacts that may come from a changing climate, which can lead to increases in extreme events such as wildfires that can impact air quality locally and regionally.

AIR QUALITY PLAN DEVELOPMENT



Air Quality Forum, March 6, 2019

The first Air Quality Plan was adopted in 1993 and has undergone periodic updates and revisions every five to 10 years.³ This Air Quality Plan was developed in coordination with the City's 2019 comprehensive plan update, which includes long-term land use and transportation planning principles and policies. City Council adopted the revised City Plan on April 16, 2019, and air quality principles, policies and strategies from the City Plan are repeated here. Specific action items in this Plan are updated administratively, and informed by consultation efforts with the community, regional partners and stakeholders including:

- The 2017 Air Quality, Climate and Recycling Survey;⁴
- Consultation with the City's Air Quality Advisory Board and Natural Resources Advisory Board;
- A 2019 Community Air Quality Forum;⁵
- 2019 updates to City Council Air Quality Priorities; and
- Public comments received on the Draft Plan.

What is Air Pollution?

An air pollutant is a gas or particle substance in the air that can have adverse effects on human health and the environment. Long-term exposure to elevated levels of certain air pollutants has been associated with increased risk of cancer, premature mortality, and damage to immune, neurological, reproductive, cardiovascular and respiratory systems.⁶ People at greater risk of experiencing air pollution related health effects include older adults, children and those with heart or respiratory conditions.

Outdoor air pollution is influenced by local, regional and even global sources, as pollutants in the air can be widely distributed and transported. Pollution sources that affect outdoor air quality include those related to human activities, such as operating gas and diesel vehicles, coal-fired power generation and other residential, commercial and industrial activities. Pollution sources can also be naturally occurring, from sources such as wildfires and windblown dust.

Indoor air quality is also a major health concern, and it can often be worse than outdoor air. Poor indoor air quality has been tied to asthma attacks, headaches, fatigue, trouble concentrating, and irritation of the eyes, nose, throat and lungs. Additionally, longterm exposure to indoor pollutants such as asbestos and radon can lead to lung cancer.⁷ Sources of indoor air pollutants can include consumer products, such as paint, cleaning and personal care products, combustion sources such as ovens and fireplaces, and other household materials.



Testing for Carbon Monoxide during Healthy Homes Indoor Air Quality Assessment

Federal/State/City Roles

Under the Clean Air Act (CAA), the Environmental Protection Agency (EPA) is required to regulate emissions of pollutants that endanger public health and welfare. This includes regulation of common air pollutants, referred to as "criteria" pollutants. States are responsible for developing implementation plans to comply with federal regulatory standards for criteria pollutants, which include:

- Carbon monoxide (CO);
- Lead (Pb);
- Nitrogen dioxide (NO₂);
- Ozone (O₃);
- Particulate matter (PM_{2.5} and PM_{10});^8 and
- Sulfur dioxide (SO₂₎.

Climate Action Goals

Climate Action Planning activities have overarching goals aimed at reducing fossil fuel dependency and use, which has the added benefits of reducing air pollutants. The City originally adopted carbon emission goals in 1999, and in March 2015, accelerated community goals were unanimously adopted by the City Council. Community carbon emissions are tracked against the following climate goals:

In 2020, Climate, Energy and Waste policy planning documents will be updated and include a goal of **100% renewable energy for electricity by 2030.**

20%

below 2005 levels by 2020

80%

below 2005 levels by 2030

Carbon neutral by



Additional pollutants, such as Hazardous Air Pollutants (HAPs) include many hundreds of pollutants that are suspected or known to cause cancer or other serious health problems (e.g., benzene, which is often associated with combustion emissions). HAPs emissions are regulated at the federal and state level through air permits for specific sources.

While federal and state agencies have a critical regulatory role, action at the City level also plays a vital role in promoting actions that can lead to protecting and improving air quality. Capacity areas supported by the City which can influence air quality include:

- Transportation and land use planning designed to limit fuel use and vehicle miles traveled;
- Adopting Climate Action Goals for greenhouse gas emissions, where sources of greenhouse gases are also sources of air pollutants;

- Developing and administering public information and outreach, incentive and engagement programs to promote awareness and action;
- Convening and collaborating with stakeholders including businesses, industry and other local and regional partners to limit pollution sources;
- Tracking and reporting air pollution data;
- Developing and implementing local air quality policies, programs and regulations;
- Participating in regulatory rulemaking at county, state and federal levels; and
- Leading by example, by integrating air quality impact considerations in City operations.

Vision, Mission and Motivations

Air Quality Vision



A community that is vigilant about protecting the quality of air we breathe and continually strives to improve it.

Air Quality Plan Mission



To protect human health and the environment through continuous improvements in air quality.

Air pollution is not a new problem, and in many respects, increased awareness, improvements in technology and new and evolving air pollution regulations have led to improvements. Continuing efforts are necessary, as Fort Collins faces challenges related to population growth and the associated air quality concerns that come with transportation demand, and other residential, commercial and industrial pollution sources commonly associated with urban environments. Some key motivations include:

- Fort Collins, along with the Denver/North Front Range region, does not comply with EPA health-based standards for ozone;
- Localized impacts of particle pollution from dust and smoke sources (e.g., construction and wood fires) can create nuisance issues and health concerns;

- Visible air pollution, where impairment is sometimes perceived as a "brown cloud," is higher than regional standards approximately one in four days each year;
- Air quality surveys indicate that one quarter of Fort Collins' households report a member with a respiratory ailment;⁹
- Studies show that people spend up to 90% of their time indoors, and indoor air pollution is often much worse than outdoor air pollution;¹⁰ and
- Climate change may contribute to increased air quality risks, such as increased emissions from wildfires, and more high heat days that can contribute to ozone formation.

Principles and Policies



Electric Lawn and Garden Equipment Demonstration

This section lists the principles and policies that guide the City organization's efforts in air quality. Principles and policies were adopted as part of City Plan—the City's comprehensive plan—while associated strategies and actions in this Air Quality Plan are updated administratively.

Principle ENV 4 – Protect human health and the environment by continually improving air quality

The City has had a long-standing principle to continually improve air quality, which includes identifying and implementing opportunities to reduce sources of air pollutants. The policies here provide the guiding framework to support this principle.

POLICY ENV 4.1	POLICY ENV 4.2
Priority Air Pollutants	Air Pollutant Sources
Focus on high-priority air pollutants, as identified in the Air Quality Plan, considering such criteria as health impacts, community concerns, air pollution trends, compliance with current state and federal standards and ability to affect improvements at the local level.	Implement a full spectrum of options—including engagement, incentives and regulation—that focus on prevention of air pollution at the source.
POLICY ENV 4.3	POLICY ENV 4.4
Regional Pollution	Ozone Attainment
Work with local and regional partners to identify and mitigate sources of transported pollutants that influence our local air quality.	Support attainment of Federal standards for ozone by implementing programs and policies that reduce local emissions of ozone-causing pollutants and supporting legislation and policy that reduces regional transport of ozone and ozone-causing pollutants. Coordinate with key partners such as the Regional Air Quality Council (RAQC).
POLICY ENV 4.5	POLICY ENV 4.6
Indoor Air	Vehicles and Non-Road
Provide public information regarding potential indoor air quality concerns and promote	Engines
behavior change and public action to reduce	Promote efforts to reduce fuel consumption and associated pollutant emissions from vehicles

potential risks in homes, schools and

associated pollutant emissions from vehicles and non-road engine sources, such as lawn and garden equipment.

POLICY ENV 4.7

Monitoring and Reporting

Monitor, characterize, track and report ambient air pollutant concentrations to increase awareness of air quality issues and better identify opportunities to improve local air quality conditions and reduce emissions.

Ozone Nonattainment

The Environmental Protection Agency (EPA) has classified the Denver Metro/North Front Range area as a nonattainment area for ozone. This means that, during hot summer months, the highest ozone levels exceed Federal healthbased standards. As a result, the Colorado Air Pollution Control Division and the Regional Air Quality Council are engaged in extensive planning and implementation efforts, identifying both voluntary and mandatory air pollution control measures to reduce pollutants that contribute to ground-level ozone.



Strategies and Actions

2018 HUD Secretary's Award for the City's Healty Homes Program

The strategies listed in this section were adopted as part of the 2019 City Plan update.¹¹ Associated implementation actions included in this Air Quality Plan are meant to be dynamic and guide the development of City programs, staff work plans, budget recommendations, grant proposals and other actions in response to Council priorities. More detailed work plans are updated biennially through the City's strategic planning and Budgeting for Outcomes (BFO) process.

Many ongoing air quality action items are currently in place, and will continue to be evaluated, improved and streamlined to make the most efficient use of funds. Additional action items are divided as follows:

- Near-Term Focus Areas These actions are already underway or planned for implementation within one to three years.
- Emerging Ideas These reflect new and innovative ideas identified through outreach and other planning activities. Actual implementation may be longer-term (>3 years) and will depend on capacity and resources.

Near-term and emerging actions items are also identified under **Sphere of Influence** as either **Direct** or **Indirect** control, depending on whether the item is mainly a City effort, or relies heavily on external collaboration and partnerships.

City of Fort Collins staff play a critical role in helping to implement City Plan strategies in the course of carrying out their regular duties. In the City organization, air quality planning is coordinated through the Air Quality Program, which is a division of the Environmental Services Department in the Sustainability Services Area. Extensive internal collaboration among City departments is important, with key **internal partners** listed in this section. Also listed are key **external partnerships**, such as other local governments, state and federal government agencies, the private sector, academia, industry, advocacy groups, and community members.



Priority Air Pollutants and Associated Sources

Strategy ENV-4a. Update the Air Quality Plan, including identification of priority air pollutants and sources.

Priority levels for pollutants and sources in Fort Collins are determined considering criteria such as health impacts, compliance with current state and federal standards, air pollution trends, and ability to affect improvements at the local level. A summary of priority pollutants and sources, including ozone, particulate matter, and indoor air pollutants, is included in Appendix A. Current strategies and near and longer-term focus areas are summarized below.

IMPLEMENTATION ACTIONS - ONGOING

- **Pollutant Trends** Data reports are prepared annually, which summarize the number of high pollution days and pollutant trends in Fort Collins.¹²
- Emissions Summaries Municipal and citywide community emissions inventories are used to track greenhouse gas emissions, as

related to climate goals. County level emission summaries for other pollutants are generated by the Colorado Department of Public Health and Environment (CDPHE) and used to inform local programs.

- Air Quality Survey The Environmental Services Department conducts periodic Air Quality/Climate/Recycling Surveys to identify community members' beliefs and attitudes about environmental issues, help staff assess current programs and gather input to prioritize planning and outreach efforts.¹³
- Air Quality Advisory Board The Air Quality Advisory Board is appointed by City Council, and advises the City Council regarding policies, plans, and programs to improve and maintain the City's air quality. This Board regularly reviews and responds to evolving air quality priorities and issues.

POLLUTANT AND SOURCE PRIORITIES
IMPLEMENTATION ACTIONS - NEW AND EMERGING

NEAR-TERM FOCUS AREAS	DESCRIPTION
REGIONAL COLLABORATION Leverage updated ozone attribution studies to further identify ozone reduction strategies that are most important for Larimer County and the City of Fort Collins.	Lead City Entity: Environmental Services Sphere of Influence: Indirect External Partners: RAQC, CDPHE, NFRMPO
In 2019 and 2020, the Regional Air Quality Council (RAQC) will update emissions profiles and ozone attribution summaries as part of efforts required by the EPA to meet federal standards for ozone.	
CALCULATE IMPACTS Quantify and track air pollutant emission reductions related to climate policy goals and timeframes. Progress towards greenhouse gas goals has many synergies and benefits for air quality, especially for fossil-fuel based emission sources such as transportation and energy generation.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Planning, Development & Transportation, Utility Services External Partners: RAQC, CDPHE, PRPA
NEIGHBORHOOD ENGAGEMENT	Lead City Entity: Community Development &

Collaborate with neighborhoods, through the City's Sustainable Neighborhoods program,¹⁴ to identify air quality priorities and engage the community at a neighborhood scale in design and implementation of projects to reduce air quality impacts. This program provides a platform for engagement in sustainability efforts by facilitating neighborhood level workshops, projects and events.

Neighborhood Services Sphere of Influence: Indirect Internal Partners: Environmental Services **External Partners:** HOAs

EMERGING IDEAS

BUSINESS ENGAGEMENT

Coordinate City efforts to work with local business to understand an individual business' pollution impact, and help identify and support pollutant reduction goals. This could also include ways to Division, Economic Health Office highlight engaged businesses, such as a recognition event or other promotion of efforts.

DESCRIPTION

Lead City Entity: Environmental Services Sphere of Influence: Indirect Internal Partners: Utility Customer Accounts External Partners: Local businesses

STUDENTS ENGAGEMENT

Engage students to identify air guality issues and participate in developing and implementing environmental strategies.

Lead City Entity: Environmental Services Sphere of Influence: Indirect External Partners: PSD, CSU, FRCC, Non-Government Organizations (e.g., EarthForce)



Ozone Exhibit, Fort Collins, CO

Ozone Causing Pollutant Sources

Ground-level ozone is an air pollutant which, at high levels, irritates respiratory organs and affects plant growth. Ozone is not emitted directly into the air, but rather when pollutants such as nitrogen oxides (NO_X) and Volatile Organic Compounds (VOCs) react with each other to produce ozone. The highest ozone levels are usually recorded in summer months on hot, stagnant days with little wind.

Ozone levels measured in Fort Collins, and along much of the northern Front Range, exceed health-based National Ambient Air Quality Standards (NAAQS) set by the EPA. Because the region violates EPA Standards, the State is required to model and implement plans to control ozone, and the Regional Air Quality Council (RAQC) leads regulatory planning efforts to reduce these emissions. ¹⁶



SYNERGIES

Many synergies exist between actions to mitigate ozone causing air

pollution that have other beneficial outcomes besides the health benefits of improving air quality. Cutting down on ozone precursor emissions also cuts greenhouse gas emissions, which contribute to climate change. Reductions in transportation emissions may also reduce congestion and improve livability within the city.

Locally, it is important to increase awareness of the health effects of ozone and reduce local contributing sources. Sections here identify strategies and actions for the top three major source contributors, including transportation, non-road engines and oil and gas production.

Transportation Sources



Strategy ENV-4b. Promote lower-emission vehicles, reduce VMT and idling time, and collaborate regionally on strategies to reduce vehicle emissions.

Locally, transportation sources are the second largest contributor to ozone causing pollutants, and the second largest contributor to the City's greenhouse gas emission inventory. As the population in Fort Collins and along the northern Front Range continues to increase, strategies and actions that support reduced Vehicle Miles Traveled (VMTs) along with improved vehicle efficiencies and cleaner sources of energy for electric vehicles are key to reduce pollution.

IMPLEMENTATION ACTIONS - ONGOING

- **Transportation and Land Use Planning** In 2019, the City completed updates to City Plan, Transportation Master Plan and the Transit Plan. As noted in the updated City Plan, the City will continue to integrate transportation and land planning efforts in ways that reduce emissions by reducing the need to drive (e.g., denser multi-use development) and enhancing opportunities for alternative modes of transportation (e.g., walking, biking and transit). Continued planning will also include updates to the City's Bicycle and Pedestrian Plans.
- **Traffic Operations** The City of Fort Collins Traffic Operations Department oversees all aspects of traffic related responsibilities within the City. Examples of programs that target reductions in VMTs include pedestrian and bike innovations, congestion management, arterial improvements, roundabouts and adaptive signal timing.¹⁸
- Anti-idling campaigns The City conducts anti-vehicle idling campaigns aimed at reducing unnecessary idling, and associated engine emissions. Signs are available by request for any school or local business, and the City will send outreach letters in response to complaints about excessive idling in neighborhoods. Planning and zoning requirement also limit the number of drive-thru businesses, which can contribute to emissions from idling.
- Clean Vehicles At the state level, there is a commitment to maintaining progress on clean vehicles¹⁹, which was supported by the City of Fort Collins and other local governments in the region. In 2018, this included adoption of a Colorado Low Emission Vehicle (LEV) program, requiring that all new light and medium-duty vehicles meet LEV standards beginning with Model Year 2022. In 2019, the State adopted Zero Emission Vehicles (ZEV) standards, which requires an increasing percent of light duty ZEVs beginning with Model Year 2023.



Sign provided to schools upon request

Air Quality Plan - DRAFT

awareness of air quality alert days.

INCENTIVES

TRANSPORTATION SOURCES IMPLEMENTATION ACTIONS - NEW AND EMERGING

NEAR-TERM FOCUS AREAS

CALCULATE IMPACTS

Quantify air quality impacts for transportation planning scenarios and alternatives.

In 2017, Fort Collins developed a Transportation Air Quality Impacts Guidance Manual intended to guide processes which evaluate, analyze and document the benefits and tradeoffs of transportation investments as they relate to air quality.

ELECTRIC VEHICLE READINESS ROADMAP

Implement the City's Electric Vehicle Readiness Roadmap, which outlines short-term, medium-term and long-term strategies to become EV ready as Sphere of Influence: Direct a community.

The roadmap was developed in 2018 to guide plans to encourage, prioritize and support the purchase and use of electric vehicles as alternatives to gas and diesel-powered vehicles. Near-term implementation includes improving awareness of benefits and tax incentives, and making charging stations more accessible.

REGIONAL COLLABORATION

Collaborate with regional partners to reduce emissions from vehicles originating from outside of City limits. This could include supporting employer commuter trip reduction programs, and working with partners to External Partners: NFRMPO, CDOT, add new regional transit services and regional multiuse transportation options such as bike trails.

EMERGING IDEAS

OUTREACH AND EDUCATION

Provide outreach regarding the relative impact of different types of vehicles, to increase awareness to inform consumer choices related to carbon and air quality footprints for specific types of vehicles.

Higher emitting vehicles such as larger trucks and Sport Utility Vehicles are often a preferred choice in our community as demonstrated thought data collected for the climate emissions inventory, while smaller vehicles may lower emissions and help save on fuel costs and lower emissions.

high ozone concentrations to encourage alternatives to single passenger

vehicles. This would be combined with programs to increase access to and

Lead City Entity: Environmental Offer incentives, such as free bus passes, when air quality forecasts predict Services Sphere of Influence: Direct Internal Partners: Planning, **Development & Transportation**

Lead City Entity: Planning, **Development & Transportation** Sphere of Influence: Indirect CSU, Larimer County, regional municipalities

Lead City Entity: Environmental

Sphere of Influence: Indirect

Internal Partners: Planning, **Development & Transportation**

Lead City Entity: Planning **Development & Transportation** Internal Partners: Sustainability Services, Operations Services

External Partners: RAQC, NFRMO,

Lead City Entity: Planning **Development & Transportation** Sphere of Influence: Direct Internal Partners: Environmental Services

DESCRIPTION

CEO

Services

Non-Road Engine Sources



Strategy ENV-4c. Incentivize and promote use of electric or low-emission alternatives to non-road gas and diesel engines such as lawn and garden maintenance equipment, for residential, municipal and commercial use.

A non-road engine is an internal combustion or gas turbine engine used for purposes other than a vehicle operated on public roadways. This includes a wide range of uses such as for equipment used for lawn and garden maintenance, snow removal. and portable energy generators. Locally, non-road engine sources are the third largest local contributor to ozone causing pollutants. where pollution from these types of engines comes from the by-products of the combustion process (exhaust) and from evaporation of the fuel itself.

IMPLEMENTATION ACTIONS - ONGOING

- Residential lawn and garden equipment purchase and exchange program - Since 2009, the City has supported rebates to purchase new electric lawn and garden equipment, and recycle gaspowered equipment.²⁰
- City-owned Commercial lawn and garden equipment on public lands -Beginning in 2016, the City secured grants and allocated funds to accelerate the replacement of City-owned commercial grade gaspowered lawn and garden equipment with electric (battery) powered equipment. In addition to reducing municipal emissions, these efforts will be leveraged to demonstrate feasibility for the private sector, as some of the technology is relatively new.
 Operator feedback has been that electric equipment has met operational needs, reduces noise, reduces the odor of evaporative emissions from gasoline, and in some cases outperforms gas powered alternatives.
- Low Maintenance Landscapes The City offers programs that educate, support and incentivize a switch from the traditional lawn landscape to more regionally appropriate landscapes that reduce yard maintenance, which also reduces emissions from gaspowered lawn and garden maintenance equipment.²¹



Collecting feedback on electric lawn and garden equipment programs at the March 6, 2019 Air Quality Community Forum

NON-ROAD ENGINE SOURCES IMPLEMENTATION ACTIONS - NEW AND EMERGING	
NEAR-TERM FOCUS AREAS	DESCRIPTION
PURCHASING POLICY Revise purchasing policies or work contracted by the City to increase weighting and emphasis on sustainability factors in Request for Proposals (RFPs), such as use of electric lawn and garden equipment for the City's 3 rd party contracts.	Lead City Entity: Financial Services Sphere of Influence: Direct Internal Partners: Environmental Services External Partners: City service providers
BUSINESS ENGAGEMENT Implement engagement opportunities with commercial landscapers and the community to demonstrate feasibility of electric equipment, such as an electric equipment demonstration day and/or showcasing City maintained low- to zero-emission landscaping zones.	Lead City Entity: Environmental Services Sphere of Influence: Indirect Internal Partners: Parks Planning & Development External Partners: Commercial landscaping businesses
EMISSION REDUCTION CALCULATIONS Calculate emission reduction impacts, fuel savings and returns on investment associated with switches to electric commercial grade lawn and garden equipment.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Parks Planning & Development External Partners: RAQC
EMERGING IDEAS	
INFRASTRUCTURE Install and maintain infrastructure to provide electric power options at City facilities for food trucks and other small engine sources. The prominence of food trucks in Fort Collins comes with portable power needs, which often includes gas or diesel generators. Some food truck events and gatherings are conducted in City recreation areas, such as City Park and Fossil Creek Community Park.	Lead City Entity: Parks Planning & Development Sphere of Influence: Direct Internal Partners: Environmental Services, Utility Services External Partners: Food truck businesses
INCENTIVES Incentivize the purchase of commercial grade electric lawn and garden equipment for the private sector.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Parks Planning & Development External Partners: RAQC
NEIGHBORHOOD ENGAGEMENT Facilitate development of equipment rental or resource sharing programs for electric lawn and garden equipment.	Lead City Entity: Environmental Services Sphere of Influence: Indirect Internal Partners: Community Development and Neighborhood Services External Partners: Neighborhoods/HOAs

Oil and Gas Production Sources

Strategy ENV-4d. Support reductions in oil and gas production and development related emissions, update the local Operator's Agreement, and collaborate regionally on strategies to reduce emissions.

Studies have shown that regional emissions transported from oil and gas operations, such as Volatile Organic Compound (VOC) emissions from pipes, valves and storage tanks, are one of the largest contributors to high ground level ozone measurements in Fort Collins. Additionally, Fort Collins community members have expressed continuing concern about the human and environmental health impacts from oil and gas operations, particularly from the hydraulic fracturing treatment used on most Colorado wells.

IMPLEMENTATION ACTIONS - ONGOING

State Regulations - Oil and gas development in Colorado is regulated by the Colorado Oil and Gas Conservation Commission (COGCC). Periodically, the Colorado Department of Health and Environment (CDPHE) and the Colorado Oil and Gas Conservation Commission (COGCC) engage in rule-making activity related to oil and gas emissions, and the City monitors and responds to State regulatory changes that might affect regional transport of pollutants and/or local authority regarding oil and gas regulations. With the passage of SB 19-181 on April 3, 2019, the City expects to be engaged with several of the new rulemakings related to protecting public health, safety, welfare, the environment and increasing the scope of local authority.

- Local Government Designee Program The City participates in the COGCC's Local Governmental Designee (LGD) program, which establishes a point of contact between the COGCC and individual counties and municipalities. The LGD is notified of activities such as submittal of new permits, can request extension of public comment periods for permit applications, and can participate in COGCC hearings. Both the City and Larimer County have LGDs as points of contact, and the LGDs share information regarding oil and gas activity in the City's Growth Management Area (GMA).
- Land Use Code The City's Land Use Code includes setback requirements for new development around existing wells and other oil and gas infrastructure (called reciprocal setbacks). These rules were updated in 2018. Conversely, the COGCC regulations include setbacks for the proximately of new wells to existing development.
- **Operators Agreement** Currently, the City administers and Operators Agreement with the oil and gas operator that is within City limits. The agreement contains requirements for air sampling and other Best Management Practices (BMPs) for new wells drilled within Fort Collins City limits.



NEAR-TERM PROGRAMS	DESCRIPTION
LAND USE CODE Implement updates to Land Use Code to provide additional clarity for siting of new oil and gas wells and infrastructure, including consideration of comprehensive updates to complement or replace requirements in the current Operators Agreement.	Lead City Entity: Planning, Development & Transportation Sphere of Influence: Direct Internal Partners: Environmental Services, City Attorney's Office, City Council
EMERGENCY MANAGEMENT PLAN Work with oil and gas facility operator to update an emergency management plan outlining a coordinated inter-agency response for spills or other events.	Lead City Entity: Office of Emergency Management Sphere of Influence: Direct Internal Partners: Environmental Services, Environmental Regulatory Affairs External Partners: PFA, Larimer County, O&G Operators, COGCC
REGIONAL COLLABORATION Collaborate with Larimer County to update and implement regulations in and near the GMA, and on City owned property outside of City limits such as Soapstone Natural Area and Meadow Springs Ranch. In 2019, Larimer County formed an Oil and Gas Task Force to develop County level regulations to supplement State regulations that mitigate impacts on land use and public health and address industry changes.	Lead City Entity: Planning, Development & Transportation Sphere of Influence: Direct Internal Partners: Environmental Services, Natural Areas External Partners: COGCC, Larimer County

EMERGING IDEAS

LEGACY WELLS

Mitigate or eliminate surface impacts from existing active and abandoned wells within residential neighborhoods in City limits and the GMA.

While the oil and gas field in northeastern Fort Collins is small, there are a few wells in the region that are older oil wells (last drilled in 1992) which pre-date current regulations and residential development in the area.

Lead City Entity: Planning, Development & Transportation Sphere of Influence: Direct Internal Partners: Environmental Services External Partners: COGCC, O&G Operators

Indoor Air Quality



Strategy ENV-4e. Implement programs designed to inform residents about potential indoor air quality concerns and mitigation opportunities, through programs such as the volunteer based Healthy Homes Indoor air quality assessments, radon awareness, testing and mitigation, and energy-efficiency programs.

Indoor air quality refers to the air quality within and around buildings and structures, especially as it relates to the health and comfort of occupants. Indoor pollutants like radon. mold, particles and chemicals can build up to unhealthy levels, leading to the findings that indoor air quality can be up to 5 times worse than outdoor air quality.²² The indoor environment is a place where individuals can be empowered to have more control, and the *City supports* programs which enable community members to manage pollutant sources in their homes.

IMPLEMENTATION ACTIONS - ONGOING

• Healthy Homes Indoor Air Quality Assessments – Since 2011, the healthy homes program²³ has provided resources to help address indoor air quality issues related to adverse health effects by recommending low cost or no cost solutions for common indoor air quality issues. The City recruits, trains, supports and recognizes volunteer Master Home Educators to provide free, in-person indoor air quality assessments. An online "Do-It-Yourself" assessment is also available. In 2018, Healthy Homes became a nationally recognized as a recipient of the HUD Secretary's Award for Healthy Homes in the category of Policy and Innovation.



IMPROVING INDOOR

 Radon Awareness Testing, and Mitigation - The City has supported radon outreach, testing and mitigation programs for more than two decades. This includes provision of low-cost test kits, requiring that information on the risks of radon exposure be provided during home purchases, and requiring passive radon mitigation standards in new buildings.²⁴



NEAR-TERM FOCUS AREAS

INDOOR AIR QUALITY

ENERGY EFFICIENCY AND INDOOR AIR QUALITY

IMPLEMENTATION ACTIONS - NEW AND EMERGING

Align energy efficiency and indoor air quality programs to streamline and optimize steps to make homes more comfortable, healthy and efficient. Improving the energy efficiency of buildings usually involves air sealing and other weatherization techniques, which can create or exacerbate indoor air quality issues if not properly ventilated.

DESCRIPTION

Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Utility Services

EQUITY AND INCLUSION

Improve accessibility to indoor air quality improvement opportunities by targeting outreach and engagement opportunities towards the Spanish speaking community, the elderly and low to moderate-income homeowners and renters. Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Utility Services External Partners: PSD, Larimer County

EMERGING IDEAS

CONSUMER PRODUCTS

Increase awareness and promotion of behavior changes around selection and use of consumer products to reduce VOCs, which contribute to indoor air pollution and ozone formation. Common consumer products that are formulated with VOCs, include paint, cleaning products, and personal care products. Lead City Entity: Environmental Services Sphere of Influence: Indirect External partner: Local businesses

VOLUNTEER TRAINING

Develop online training curriculum to make the Healthy Homes Volunteer training curriculum more accessible and available yearround. Currently, volunteers are recruited and trained annually during several evening sessions. Lead City Entity: Environmental Services Sphere of Influence: Direct

CALCULATE IMPACTS

Develop qualitative and quantitative tools that demonstrate the overall impact on health and well-being of indoor air quality improvements for community members in their homes and businesses. Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Utility Services External Partners: CSU

Environmental Regulation

Strategy ENV-4f. Develop and implement effective, enforceable air quality policies and regulations at the local level, where local regulations make sense to augment any federal, state or County regulations.

Local regulations are important when there are gaps in existing State and Federal regulations, or opportunities that are better addressed locally. The City's Environmental regulation efforts include enforcing compliance, and regularly reviewing and updating policies as gaps are identified and best practices evolve. Promoting compliance generally involves providing education, outreach and other assistance to encourage voluntarily compliance before a regulatory response is initiated.

IMPLEMENTATION ACTIONS - ONGOING

- Air quality complaints City staff investigate and respond to air quality complaints and concerns. Often, this can mean identifying appropriate county or state requirements and compliance resources.
- **Municipal Health and Environment Code** Citywide rules related to air quality include limitations on smoking in public areas, radon disclosure requirements for home transactions, and requirements for control of dust emissions.
- **Municipal Air Pollution Nuisance Code** City code prohibits public air pollution nuisances. This code was updated in 2019 to add specific requirements for nuisances related to outdoor wood burning fires.
- Industry Agreements Emissions from industrial sources are regulated at the federal and state level, but businesses are often interested in proactive measures and agreements with the City to reduce pollutant sources. The City currently administers a Memorandum of Understanding (MOU) with an asphalt manufacturer, and an Operators Agreement (OA) with an oil and gas operator. These types of agreements are developed cooperatively with the respective industrial sources.
- **Regional Policy** Annually, the City updates a Legislative Policy Agenda; a broad set of policy statements meant to convey position on regional legislative policy issues that affect our community. In 2019, this included policy statements related to air quality that guided City engagement in legislative action at the state level related to vehicle regulations, and oil and gas development.

IMPLEMENTATION ACTIONS - NEW AND EMERGING NEAR-TERM FOCUS AREAS	DESCRIPTION
OUTDOOR RESIDENTIAL WOOD BURNING Evaluate implementation of new 2019 updates to air pollution nuisance code related to outdoor residential wood burning. In 2019, code updates included a 10pm curfew outdoor wood burning fires, and a 15-ft setback requirement for locating wood fires away from adjacent property lines.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Community Development and Neighborhood Services External Partners: PFA
FUGITIVE DUST Update training and technical assistance resources to support compliance with municipal code related to fugitive dust, or particulate matter that has become airborne by wind or human activities. A Fugitive Dust Ordinance, adopted in 2016 and updated in 2018, requires owners and operators of dust generating activities to incorporate best management practices to reduce off-property transport of fugitive dust.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Environmental Regulatory Affairs, Community Development and Neighborhood Services, Engineering External Partners: Larimer County, CDPHE
EMERGING IDEAS	
RADON Explore additional policy options related to radon testing, disclosure and notification requirements for real estate and rental transactions. In 2018, a radon working group identified several specific regulatory options of interest related to testing, disclosure and notification.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: City Attorney's Office City Council External Partners: Larimer County, CDPHE
AIR POLLUTION NUISANCES Develop further clarity on the operational definition of a public air pollution nuisance and provide additional resources for community members to address private nuisances.	Lead City Entity: Environmental Services Sphere of Influence: Indirect Internal Partners: Community Development and Neighborhood
City jurisdiction applies to public nuisances, which affect an entire community or many people, as opposed private nuisance effects an individual or the property rights of a small number of people. The city	Services

individual or the property rights of a small number of people. The city often hears concerns about private nuisances and could provide additional resources for community members to better address these concerns.

Air Quality Monitoring

Strategy ENV-4g. Support implementation and expansion of the air quality monitoring network to track and report on air quality indicators

Monitoring and reporting air pollution data contributes to increased awareness of air quality issues and identifies opportunities to improve local air quality conditions. Measured data are also used to forecast future air quality impacts, such as ozone alert days. and to determine compliance with Federal and State standards. Air quality monitoring data, real-time visibility camera images and air quality alerts are available through www.fcgov.com/airguality.

IMPLEMENTATION ACTIONS - ONGOING

- **Criteria Pollutants** Criteria pollutants, or pollutants with Federal air quality standards, are monitored per EPA requirements by the CDPHE. In Fort Collins, this includes ozone and particulate matter. While the State has primary responsibility of monitoring outdoor air pollution per Federal standards, the City works with the State to track and report air pollution data and provide recommendations for updates to State monitoring plans.
- Air Quality Exhibit- In 2018, a new ozone monitoring and education exhibit was installed as a feature at the Gardens on Spring Creek. This site includes real time displays of ozone, particulates, and weather information such as precipitation, temperature and relative humidity.
- **Visibility Monitoring** Visual qualities of the atmosphere are some of the most obvious indicators of air quality, with haze episodes sometimes known as "brown clouds." Indicators of visibility (e.g., light extinction) have been measured in Fort Collins continuously since 1993. A visibility camera system was added in 2016, which provides images showing the real-time visible impacts of smoke or haze.
- **Night Sky** Night sky visibility can be affected by both light pollution and air pollution. In 2018 the City deployed the Sky Quality Meters at air quality monitoring sites. These meters establish a measurement of light pollution as a baseline upon which future efforts related to reductions in light pollution can be measured.
- **City as a Platform** The concept of "City as a Platform" revolves around a growing understanding that new communication and collaboration frameworks are needed between community members and the public and private sectors in order to foster greater sustainability, inclusion, and innovation. Regarding air quality, university and private sector businesses are increasingly collaborating with Cities to leverage municipal infrastructure to test monitoring equipment. As an example, in 2018, CSU worked collaboratively with the City to test innovative community-scale monitoring equipment in downtown Fort Collins as part of a grant through the National Oceanic and Atmospheric Administration (NOAA).

NEAR-TERM FOCUS AREAS	DESCRIPTION
VISIBILITY EXHIBIT Develop an education exhibit related to air quality and visibility. This will leverage real-time images from a visibility camera that was installed at the Fort Collins Museum of Discovery in 2019.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Cultural Services External Partners: CSU, CIRA, NPS
EMERGING IDEAS	
COMMUNITY-SCALE MONITORING Enable the expansion of community-scale monitoring. As air quality monitoring instrumentation becomes more inexpensive and portable, the City could explore ways to facilitate participatory approaches to gather and report more spatially representative data to better identify localized impacts.	Lead City Entity: Environmental Services Sphere of Influence: Indirect Partners: CDPHE, CSU
OZONE MONITORING Implement regulatory monitoring recommendations that might allow for better understanding of upwind background, and regional transport of pollutants. In 2017, an NCAR report evaluated contributions to ozone in Fort Collins, and recommended additional monitoring considerations such as the addition of a NOX monitor, and relocation of one of the City's ozone monitors.	Lead City Entity: Environmental Services Sphere of Influence: Indirect External Partners: CDPHE, NCAR
VISIBILITY PERCEPTION STUDY Update visibility standard, using a citizen science-based visibility perception study. A non-regulatory visibility standard currently used in Fort Collins is based on a 1989 Denver study, which was based on perception of "acceptable" vs. "unacceptable" visibility or haze conditions. An updated study would refresh metrics and be more specific to the judgment of Fort Collins community members for Fort Collins viewsheds.	Lead City Entity: Environmental Services Sphere of Influence: Direct External Partners: CDPHE, CIRA, NPS
PARTICULATE MATTER COMPOSITION Install monitors that measure the composition of fine particulate matter, or PM _{2.5} . Understanding PM _{2.5} composition can helps define strategies to reduce particle pollution. This could include exploration	Lead City Entity: Environmental Services Sphere of Influence: Indirect External Partners: CDPHE

strategies to reduce particle pollution. This could include exploration

of opportunities to leverage national monitoring networks.

Climate Adaptation

Strategy ENV-4h. Implement programs for adaption to potential air quality impacts from climate change, such as increased risk of smoke from wildland fires.

The relationship between air quality and climate change is complex, yet clearly connected. Climate change effects, such as a hotter drier climate. can affect air quality in a number of ways. Impacts to air quality include increased frequencies of high heat days and increased risk of wildfires, which contribute to regional ozone and particle pollution events. Adaptation strategies to improve the community's climate resilience include increasing awareness of health risks associated with smoke events. sharing information about pollution events, and providing tools for community members to protect themselves during poor air quality events.

IMPLEMENTATION ACTIONS - ONGOING

- **Regional Collaboration** The City works with regional partners to identify and mitigate the risk of wildland fires in and around Fort Collins and the GMA. In 2012, the City collaborated with PFA, Larimer County and the U.S. Forest Service during the High Park Fire, to deploy particulate monitoring equipment, and connect the community to resources and information about smoke forecasts and air quality impacts.
- Parks pilot program In 2016, the City's Recreation Department began using the EPA Air Quality Index (AQI) to make informed decisions about moving community recreation programs and activities indoors or cancelling when air quality is expected to be poor.

AQI (AIR QUALITY INDEX)



The Air Quality Index is a tool used by the EPA to communicate current and forecasted air pollution levels, and potential impacts.

IMPLEMENTATION ACTIONS - NEW AND EMERGIN NEAR-TERM PROGRAMS	DESCRIPTION
WILDFIRE SMOKE RESPONSE PLAN Develop internal communications protocol and an outreach plan to streamline the process of connecting community members to information to better prepare and respond to air quality impacts before, during and after a wildfire.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Office of Emergency Management External Partners: PFA, CDPHE, Larimer County
OUTREACH AND EDUCATION Implement Air Quality Index (AQI) outreach and awareness campaigns to better connect the community to air quality alerts and action days, which are provided by the CDPHE when ozone or particulate concentrations are forecast to be high.	Lead City Entity: Environmental Services Sphere of Influence: Direct External Partners: RAQC, CDPHE, Larimer County
EVENT PLANNING GUIDANCE Develop community guidance to assist event planners in decision making that is responsive to forecasted or measured air pollution events. This would be based on guidance used by the City's recreation department.	Lead City Entity: Environmental Services Sphere of Influence: Direct Internal Partners: Parks and Recreation External Partners: CSU, PSD
WILDFIRE RESPONSE MONITORING PLAN Identify additional monitoring resources that could be deployed to better characterize particulate pollution impacts during a wildfire event.	Lead City Entity: Environmental Services Sphere of Influence: Direct External Partners: NPS, USFS, CDPHE, Larimer County, CSU
EMERGING IDEAS	
HOME ASSESSMENTS	Lead City Entity: Utilities Sphere of Influence: Direct

Use the Epic Certificate process to identify homes that have been professionally air sealed and are equipped with appropriate filtration systems to potentially mitigate impacts from wildfire smoke.

Lead City Entity: Utilities Sphere of Influence: Direct Internal Partners: Environmental Services

SMOKE SHELTERS

Identify and inventory public buildings which have appropriate filtration to mitigate wildfire smoke.

Lead City Entity: Utilities Sphere of Influence: Indirect Internal Partners: Utilities

Lead by Example

Strategy ENV-4i. Implement municipal policies to lead by example in efforts to reduce and mitigate emissions associated with City operations, such as energy efficiency programs; anti-idling; and low-emission fleet and lawn and garden equipment purchasing policies.

The City strives to lead by example in efforts to improve local air quality, by reducing air pollution emissions affected by City operations. In 2019, the City developed the Municipal Sustainability and Adaptation Plan (MSAP), which is the employee roadmap for operating and building a healthy and sustainable organization, including objectives to lead by example in reducing emissions from energy generation, fossil fuel combustion and other activities.

IMPLEMENTATION ACTIONS - ONGOING

- Municipal Lawn and Garden Equipment The MSAP outlines a strategy to "Convert municipal small engines, such as lawn and garden equipment, to be fossil fuel free." Since 2017, the City has received \$55K in grant funding from the Regional Air Quality Council (RAQC) to pilot use of commercial grade electric lawn and garden equipment and accelerate progress towards a full fleet of electric powered equipment for municipal lawn and garden maintenance.
- **Municipal Fleet** The MSAP outlines a strategy to "Increase electric vehicles in the City fleet by making 100% of light duty vehicle purchases plug-in electric by 2025." Fort Collins' Fleet Services division was named a Top 10 Leading Fleet in 2018 by the Government Fleet and American Public Works Association. This award recognizes public-sector fleets for their leadership, efficiency and vision. Additionally, the Northern Colorado Clean Cities (NCCC) presented the City of Fort Collins with the 2018 Leading Public Fleet for the Year for reducing fuel use from the municipal fleet.
- **Employee Vehicle Use** The City has strategies to "Support City employees to lead by example in sustainable vehicle use and commuting." This includes an idling policy that prohibits unnecessary idling of longer than 30-seconds for City vehicles and equipment with internal combustion engines.
- **Transit** In April 2019, the City was awarded nearly \$1.5 million from the Colorado Department of Transportation through the Volkswagen Settlement Trust. This funding will go toward three small alternative fuel buses and the replacement of two diesel buses with battery electric buses and two electric vehicle charger stations.

LEAD BY EXAMPLE IMPLEMENTATION ACTIONS - NEW AND EMERGING	
NEAR-TERM FOCUS AREAS	DESCRIPTION
SUSTAINABLE PURCHASING Update sustainable purchasing practices that encourage mitigation of air pollution impacts from 3rd party City contacts for City services.	Lead City Entity: Sustainability Services Sphere of Influence: Direct Internal Partners: Financial Services
CITY TRANSPORTATION SYSTEMS Continue progress towards a goal for the City fleet to make 100% of light duty vehicle purchases plug-in electric by 2025.	Lead City Entity: Operations Services Sphere of Influence: Direct External Partners: RAQC, CDOT, COE
LAWN AND GARDEN EQUIPMENT Define goals to continue progress towards a fully electric lawn and garden maintenance fleet.	Lead City Entity: Parks Sphere of Influence: Direct Internal Partners: Environmental Services External Partners: RAQC
EQUIPMENT DECOMMISSIONING Evaluate equipment decommissioning practices for surplus City property, such as gas -powered equipment, to determine appropriate disposal methods that limit potential future contributions to emissions.	Lead City Entity: Parks Sphere of Influence: Direct Internal Partners: Environmental Services

NEW/EMERGING IDEAS

CITY BUILDINGS

Implement a resiliency analysis, which in part will identify and prioritize facility updates and repairs related to potential indoor and/or outdoor.

Lead City Entity: Operations Services Sphere of Influence: Direct Internal Partners: Utilities, Environmental Services

ENDNOTES

- ¹ In the City of Fort Collins 2017 Citizen Survey, 83% of respondents rated the air quality as "excellent" or "good." <u>https://www.fcgov.com/airquality/survey.php</u>
- ² Since 2004, the City of Fort Collins has been part of the Denver Northern Front Range nonattainment area for ozone, meaning that measurements here are sometimes higher than federal health-based standards. <u>https://www.colorado.gov/pacific/cdphe/ozone-planning-chronology</u>
- ³ <u>http://www.fcgov.com/airquality/plans-policies.php</u>
- ⁴ Air Quality survey results are available at <u>http://www.fcgov.com/airquality/survey.php</u>.
- ⁵ The Air We Breathe: A Community Conversation on Air Quality report is available at <u>https://www.fcgov.com/airquality/reports</u>
- ⁶ U.S. EPA, 2007. The Plain English Guide to the Clean Air Act. EPA-456/K-07-001. Available at <u>http://ww.epa.gov</u>
- ⁷ <u>https://www.osha.gov/SLTC/indoorairquality/</u>
- ⁸ PM_{2.5} is particulate matter less than 2.5 micrometers in diameter and PM₁₀ is particulate matter less than 10 micrometers in diameter.
- ⁹ <u>https://www.fcgov.com/airquality/survey.php</u>
- ¹⁰ <u>https://www.epa.gov/indoor-air-quality-iaq</u>
- ¹¹ The Comprehensive City Plan is available at <u>https://www.fcgov.com/planfortcollins/</u>
- ¹² Air quality reports are available at <u>https://www.fcgov.com/airquality/reports</u>.
- ¹³ Full survey reports are available at <u>https://www.fcgov.com/airquality/survey.php</u>
- ¹⁴ More information available at <u>https://www.sustainableneighborhoodnetwork.org/fortcollins</u>
- ¹⁶ <u>http://raqc.org/</u>
- ¹⁸ <u>https://www.fcgov.com/transportation/</u>
- ¹⁹ On June 19, 2018, Governor Hickenlooper sign Executive Order B 2018 006, Maintaining Progress on Clean Vehicles.
- ²⁰ <u>www.fcgov.com/airquality/rebate</u>
- ²¹ <u>https://www.fcgov.com/utilities/residential/conserve/water-efficiency/xeriscape</u>
- ²² <u>https://www.epa.gov/report-environment/indoor-air-quality</u>
- ²³ <u>www.fcgov.com/healthyhomes/</u>
- ²⁴ www.fcgov.com/airquality/radon

ACRONYMS

AGZA	American Green Zone Alliance
AQI	Air Quality Index
BMP	Best Management Practice
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CEO	Colorado Energy Office
CIRA	Cooperative Institute for Research in the Atmosphere
COGCC	Colorado Oil and Gas Conservation Commission
CSU	Colorado State University
EPA	Environmental Protection Agency
FRCC	Front Range Community College
GMA	Growth Management Area
НОА	Homeowners Association
HUD	Housing and Urban Development
LEV	Low Emission Vehicle
LGD	Local Government Designee
MSAP	Municipal Sustainability and Adaptation Plan
NAAQS	National Ambient Air Quality Standards
NCCC	Northern Colorado Clean Cities
NFRMPO	North Front Range Metropolitan Planning Organization
ΝΟΧ	Oxides of Nitrogen
NPS	National Park Service
O ₃	Ozone
PM	Particulate Matter
PM 10	Subset of particulate matter with aerodynamic diameters less than or equal to 10 μm (micrometers)
PM _{2.5}	Subset of particulate matter with aerodynamic diameters less than or equal to 2.5 μm (micrometers)
PRPA	Platte River Power Authority
PSD	Poudre School District
RAQC	Regional Air Quality Council
RFP	Request for Proposal
USFS	United States Forrest Service
VMT	Vehicle Miles Travelled
VOC	Volatile Organic Compounds
ZEV	Zero Emission Vehicle