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Ozone Advance
c/o Laura Bunte,
US Environmental Protection Agency
Office of Air Quality Planning & Standards Mail Code C304-01
109 TW Alexander Drive
Research Triangle Park, NC 27711

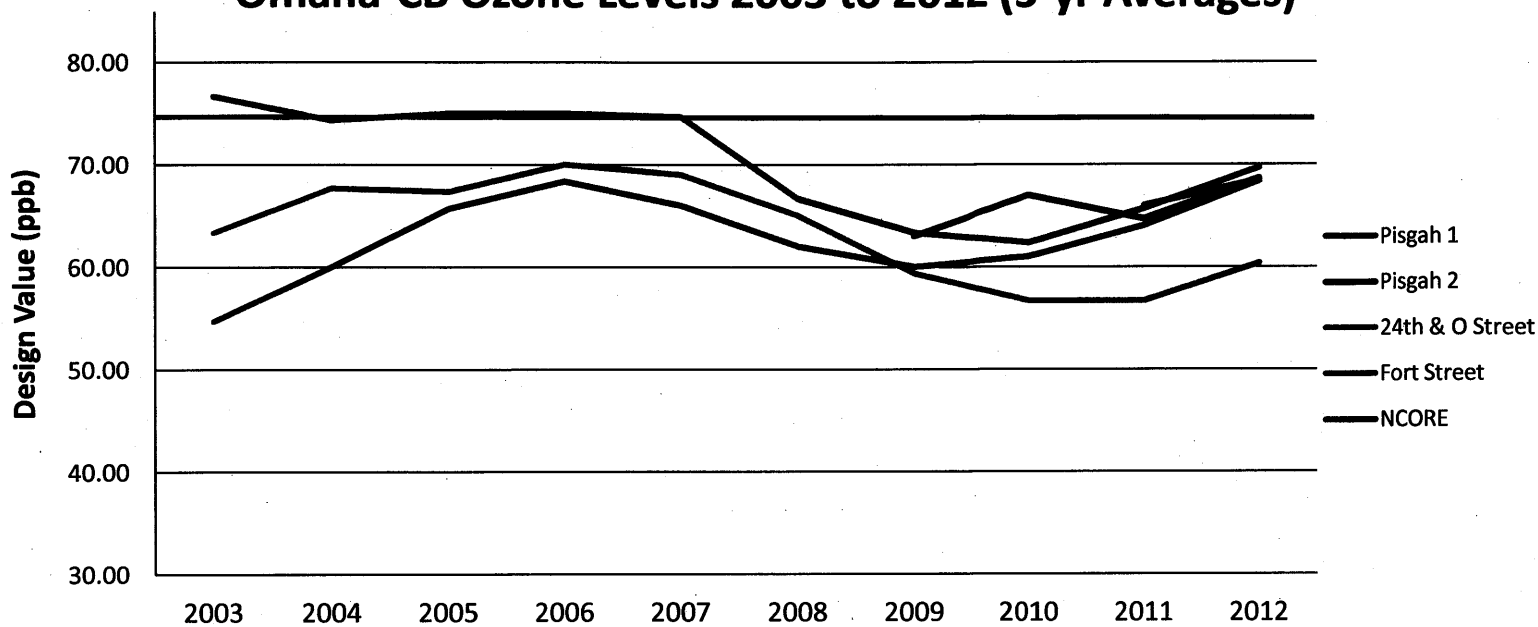
Dear Ms. Bunte:

The City of Omaha's Air Quality Control division (OAQC), Metropolitan Area Planning Agency (MAPA), and Douglas County Health Department (DCHD) are pleased to be a part of the Environmental Protection Agency's Ozone Advance program. The Omaha-Council Bluffs Ozone Advance program began as an extension of the 2010 Clean Air Performance Agreement (CAPA) initially entered into by the States of Nebraska and Iowa with EPA Region VII. This program has focused primarily on public education and outreach about ozone, its health effects, and the impact of potential future non-attainment with the ozone NAAQS. As the Omaha-Council Bluffs Ozone Advance program enters its second year the public education campaign will continue, but voluntary actions aimed at reducing ozone-forming pollutant emissions are becoming more concrete. This letter is intended to serve as the "Path Forward" required for our participation in the Ozone Advance program. It will lay out the immediate and short-term path forward the Omaha-Council Bluffs Ozone Advance program will take to reduce emissions of ozone precursor pollutants.

Monitor Values

The Omaha-Council Bluffs Ozone attainment area consists of the eight counties in the Omaha-Council Bluffs Core-Based Statistical Area (CBSA): Douglas, Sarpy, Washington, Cass, and Saunders Counties in Nebraska; and Pottawattamie, Harrison, and Mills Counties in Iowa. The area is currently served by five ozone monitors – three within Omaha and two near Pisgah, Iowa, downwind from Omaha with the prevailing winds found during ozone season. All of the monitors in the Omaha-Council Bluffs metro are in attainment with the 2008 ozone standard of 75 ppb. However, historical values have approached or exceeded this level, as seen in the following chart:

Omaha-CB Ozone Levels 2003 to 2012 (3-yr Averages)



Though ozone values in the Metro declined from 2007 to 2010, this decline appears to have been largely weather-related, and as average summer temperatures have climbed back to normal levels, ozone levels have also increased. It is therefore imperative that stakeholders in the Omaha-Council Bluffs metro area take steps to reduce emissions of NO_x and VOCs to avoid future non-attainment with the 2008 ozone standard, as well as any future standard revision.

Past and Current Ozone-Reduction Efforts

Little Steps, Big Impact Outreach Campaign

The 2010 CAPA entered into by the States of Nebraska and Iowa with EPA Region VII was intended as an early-action program to bring together stakeholders to develop an ozone-reduction plan prior to the area entering into non-attainment with the ozone NAAQS. Though no such plan was developed during the CAPA process, the program did result in the creation of the “Little Steps, Big Impact” ozone outreach campaign. This campaign, still ongoing, has included television, radio, newspaper, transit, and billboard ads – as well as the website www.littlestepsbigimpact.com – designed to educate the public on ozone pollution and to prompt them to take action to reduce their impact on ozone in the Metro area.

Ozone Action Day Program

Another significant development from the 2010 CAPA process has been the partnership between OAQC, MAPA, and DCHD to reduce ozone in Omaha. Initially brought in as stakeholders in the CAPA process, our three agencies have subsequently formed the Ozone Action Day Program and now the Omaha-Council Bluffs Ozone Advance Program. The Ozone Action Day Program – still ongoing – is designed to urge action *prior to* ozone reaching levels above 100 on the AQI. In this program, when the 8-hour ozone levels are predicted to be above 67 on the AQI (66 ppb) MAPA and DCHD issue an Ozone Action Day message through Enviroflash emails, press releases, and social media to inform the public that ozone-reduction efforts are needed that day to help prevent ozone from reaching unhealthy levels.

ReEnergize Omaha and City of Omaha Retrofits

The City of Omaha, through a grant from the U.S. Department of Energy, is currently in the midst of its reEnergize Omaha program. This program, a partnership with the City of Lincoln, NE, provides energy audits to commercial and residential buildings, and energy efficiency upgrades to residential homes. Since 2011, the program has completed energy efficiency upgrades on 348 homes within Omaha. By the time the program is completed, 1,600 homes will have been upgraded. This program will not only save citizens money, decrease greenhouse gas consumption, and strengthen the local energy efficiency market, but it will also decrease energy use during the ozone season – resulting in fewer NOx emissions from the North Omaha Power Station.

The DOE grant also provided for energy efficiency upgrades to City of Omaha-owned buildings and traffic lights. At this time, 28 buildings and traffic lights have been retrofitted with energy efficiency improvements such as LED lighting. These retrofits have been a key contributor to the City of Omaha's decrease of 16% in its annual energy use from 2009-2012, which has further decreased demand for electricity, in turn causing fewer NOx emissions from the North Omaha Power Station.

OPPD AC Management Program

The Omaha Public Power District (OPPD), the electric utility serving most of the Nebraska area of the Omaha-Council Bluffs metro area, launched its AC Management Program in 2012. In this program, residential customers are given a \$30 up front credit and \$20 annual credit for agreeing to allow OPPD to install a device on their air conditioning units that cycles the units off during peak demand periods. OPPD set an initial goal of 10,000 households participating last year. Over 11,500 households signed up for the program, reducing peak summer electricity demand by 17.5 MW last year. With another goal of 10,000 new program participants this year, OPPD hopes to reduce peak demand by 50 MW in 2013. This demand reduction comes during prime ozone-forming periods in the summer, reducing the ozone precursor emissions from the largest source of NOx (OPPD's North Omaha Station) on the Nebraska side of the Metro.

Gas Can Exchange Program

In 2012, Omaha Air Quality Control was chosen to participate in the Suzuki Corporation's national VOC emission mitigation project. OAQC received 1799 new 2- and 5-gallon portable fuel containers. From August 2012 until May 2013, these new containers were exchanged for pre-2009, vented gas cans. The old cans were rendered disabled and discarded. This project is estimated to reduce VOC emissions in the Omaha metro area by over 6 tons annually. Additionally, recipients of the new cans were given outreach materials on the Little Steps, Big Impact campaign, further spreading its educational message.

CNG Conversions

As will be discussed later in this letter, alternative fuels have been and will continue to be a major focus for voluntary emission reduction efforts from mobile sources. The Metropolitan Utilities District (MUD), the water and natural gas utility for most of the Nebraska side of the Metro area, has been very aggressive in recent years in identifying potential conversion targets from gasoline or diesel vehicles to Compressed Natural Gas (CNG). Since 2010, MUD has converted or added 80 CNG vehicles to its own fleet. MUD has also partnered with Happy Cab, the Metro's largest taxicab company, to convert about 50% of its fleet to CNG, and with Omaha Metro, the City's public bus service, to convert 8 buses to CNG. In addition, MUD has built 2 CNG fill stations in Omaha, and has plans for more in the near future. These conversions have dramatically reduced NOx emissions in the Metro from these fleets.

Ozone-Reduction Efforts in 2013 and Beyond

As the Omaha-Council Bluffs Ozone Advance program begins its second year, three areas of focus have been identified: 1) Continued outreach through the Little Steps, Big Impact campaign; 2) Continuing to develop partnerships with businesses, utilities, and citizens to support the goals of the program; and 3) Voluntary emission reduction actions. These three areas have distinct components, but there are significant opportunities for overlap.

Little Steps, Big Impact in 2013

As the Little Steps, Big Impact campaign enters its fourth ozone season, our outreach focus has shifted from primarily general ozone-awareness to urging specific action. In 2013, with the help of Federal Congestion Mitigation for Air Quality (CMAQ) funds, the Omaha-Council Bluffs Ozone Action Program will be holding 12 Ozone Awareness Days. These days (June 10-13, July 15-18, and August 12-15) will feature reduced bus fares (\$.50, down from regular fares of \$1.25) in an effort to encourage greater bus ridership, especially in the summer months. Funds are available for an increase of 1,600 trips each day, a 10% increase over normal ridership. This will decrease ozone-forming emissions on these days, but more important, they will help change commuting habits in at least some of the new riders. This campaign includes extensive television, radio, internet/social media, and bus advertising.

In addition to the Ozone Awareness Days reduced bus fare program, the CMAQ funds for 2013 covered the second annual Ozone Awareness Survey. This survey is meant to assess the effectiveness of the Little Steps, Big Impact campaign on raising public awareness of ozone in the Metro. The 2012 baseline survey revealed a general lack of awareness of any air quality issues in Omaha. The 2013 version failed to show a marked improvement in this awareness. It is hoped that the expanded nature of the 2013 outreach will prove more effective at raising brand and issue awareness in the area. If funds are available, a second 2013 survey will be conducted immediately after the end of the ozone season. Subsequent surveys are planned annually, preferably at the end of each ozone season.

Developing Partnerships

As the Omaha-Council Bluffs Metro Area continues to grow, developing partnerships between public and private entities has become vitally important. The Ozone Advance program is no exception to this and is the result of a new partnership between OAQC, MAPA, and DCHD. As the program continues in 2013 and beyond, forging new partnerships will help spread our outreach message and will help effectively achieve the voluntary emission reductions needed to forestall non-attainment with the ozone NAAQS.

Though the CAPA process included stakeholders, including industrial sources of NOx and VOCs, many of Omaha's largest companies are not in fact industrial, and were excluded from the process. Part of the 2013 Ozone Awareness Days campaign has been to approach area businesses such as Mutual of Omaha, Union Pacific, and ConAgra Foods through the Omaha Chamber of Commerce. By doing so we've begun to engage them as partners – both in helping to spread awareness and in achieving emissions reductions. Several of the largest employers in the area already have car pool and bus ride incentive programs. Through our engagement with them, we aim to increase their participation and to bring in new businesses to participate as well. We also hope to increase their voluntary reductions by obtaining commitments to ozone-reduction actions such as refraining from landscape maintenance on Ozone Action Days, vehicle fleet idle-reduction policies, and evening refueling of fleet vehicles.

Keeping the stakeholders who participated in the CAPA process involved will also be important. Though the stakeholder group has not been convened since 2011, key members have been involved in planning and emission reduction efforts. Individual stakeholders have pursued their own emission reduction actions, either with the goal of reducing ozone-forming emissions or as a co-benefit to other goals. As entities work to accomplish the goals of increased sustainability, energy efficiency, and regulatory compliance, we will see emissions of NOx and VOCs decrease as well. For the purposes of our Ozone Advance program, it is important to keep these stakeholders engaged, to document emission reduction actions, and to urge further voluntary actions.

Voluntary Emission Reduction Actions

Ultimately, building partnerships will not be effective if it raises awareness but does not produce voluntary emission reduction actions. In 2013 and beyond, the primary goal of all our Ozone Advance efforts will be to spur individuals, businesses, and other entities to take action to reduce their ozone-producing emissions. While many of the individual actions urged by the Little Steps, Big Impact campaign are difficult to quantify, there are larger, more quantifiable emission-reduction efforts planned for the immediate future.

As mentioned earlier, MUD has been very aggressive in pursuing CNG-related projects and partnerships. One such partnership was announced this spring. The City of Omaha, MUD, Douglas County, the University of Nebraska-Omaha, and a local plumbing company have begun the “Driving Omaha Natural” project. With the help of a grant from the Nebraska Environmental Trust, this project will create a CNG Fleet Fund to offset the added expense of upgrading to CNG vehicle for the partner organizations. There are currently 25 heavy-duty diesel trucks, and gasoline-powered vans and pickups planned to be replaced from 2013 to 2015; as new partners join the project, this number should rise. Additionally, MUD has committed \$1.5 million over the next two years to further convert or replace its own fleet’s vehicles, and will also be building an additional CNG fueling station (from the two currently operating in Omaha) – an action that aims to reduce a barrier to wider CNG adoption. This project, to begin in the fall of 2013 and to be completed by the end of 2015, will have a marked reduction on the emissions of NOx from each participant’s fleet.

In addition to MUD’s strong efforts to participate in CNG conversions and replacements, many other organizations in the Metro area are seeking alternative fuels for their fleets. The most significant project in 2013 will be the switch of bus contractors for Omaha and Millard Public Schools. With this switch, the two school districts will replace nearly their entire fleets (400 buses) of diesel buses with buses fueled by propane autogas. This switch, which will be in effect by the start of the 2013-2014 school year, will not only save both school districts money and decrease greenhouse gas consumption, it will decrease their fleet emissions of VOCs by nearly 40% and of NOx by nearly 20% - all while nearly eliminating diesel particulate emissions around area schools.

The Omaha-Council Bluffs Ozone Advance Program will continue to urge our various stakeholders to commit to emission reduction actions – be they alternative fuel adoption, energy efficiency projects, increased promotion of rideshare and public transportation, or emission controls. We will continue to provide technical expertise, facilitation of productive partnerships (e.g. between MUD and area transport companies), and planning and implementation guidance to these projects. As we have done since this effort began, we will be continually on the lookout for opportunities to help area citizens and businesses reduce their emissions of ozone-forming compounds.

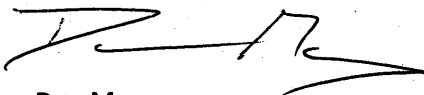
Sustaining the Omaha-Council Bluffs Ozone Advance Program

It is the view of the partners in the Omaha metro area Ozone Advance program that continued efforts to minimize emissions of ozone-forming compounds will be necessary into the future. With the upcoming ozone NAAQS review, continued growth of the Metro area, and a possible upward trend in monitored ozone levels, it will be more important than ever that we work to educate the public and to seek emission reduction commitments. Central to the continuing efforts will be funding. Past and current ozone outreach and emission reduction efforts have largely been funded by federal grant funds. Barring a drastic shift or a move into non-attainment status, this seems likely to remain the case in the near and long term future. MAPA has already secured CMAQ funding from the Iowa Department of Transportation for the 2014 ozone season campaign. It is currently applying for funding to perform a second ozone awareness survey to be conducted after the 2013 outreach campaign. Future efforts will likely be dependent on the ability to obtain further grant funds.

Funding notwithstanding, the current approach – public education, partnership forming, and seeking voluntary emission reduction actions – will continue to be the focus of our efforts. Other specific projects which may benefit our goals – such as an improved emissions inventory of the area or modeling – will be undertaken if and when funding can be secured. As 2013 is the first year in which our outreach efforts have been coupled with a specific emission reduction action (the reduced bus fare campaign), it will provide us with the first real opportunity to evaluate whether our approach is able to achieve real emission reduction actions by the general public. Ridership statistics during “Ozone Awareness Days” and the post-campaign survey (if conducted) will be used to inform our 2014 campaign planning. If we do not see significant ridership increases and/or increased awareness ozone issues in the Metro we will have to modify our message and approach to outreach. We will expect to conduct this type of evaluation after each ozone season, continually honing our message to more effectively change behaviors and communicate the issue to the public. It should also be expected that we will seek increased participation from area utilities, industries, and non-industrial businesses in our efforts – particularly if our attainment status is jeopardized.

The Omaha-Council Bluffs Ozone Advance Program will continue in 2014 and beyond understanding the following: that this effort remains vital, that resources are limited, and that the engagement of the general public and local businesses in this effort will be crucial to our success. Keeping these items in mind, we will work to maximum extent possible to reduce ozone-forming emissions within the Metro area. We look forward to working with the EPA to achieve this goal.

Sincerely,



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