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December 31, 2014

Advance Program
c/o Laura Bunte
US EPA, OAQPS, C304-01
Research Triangle Park, NC 27711

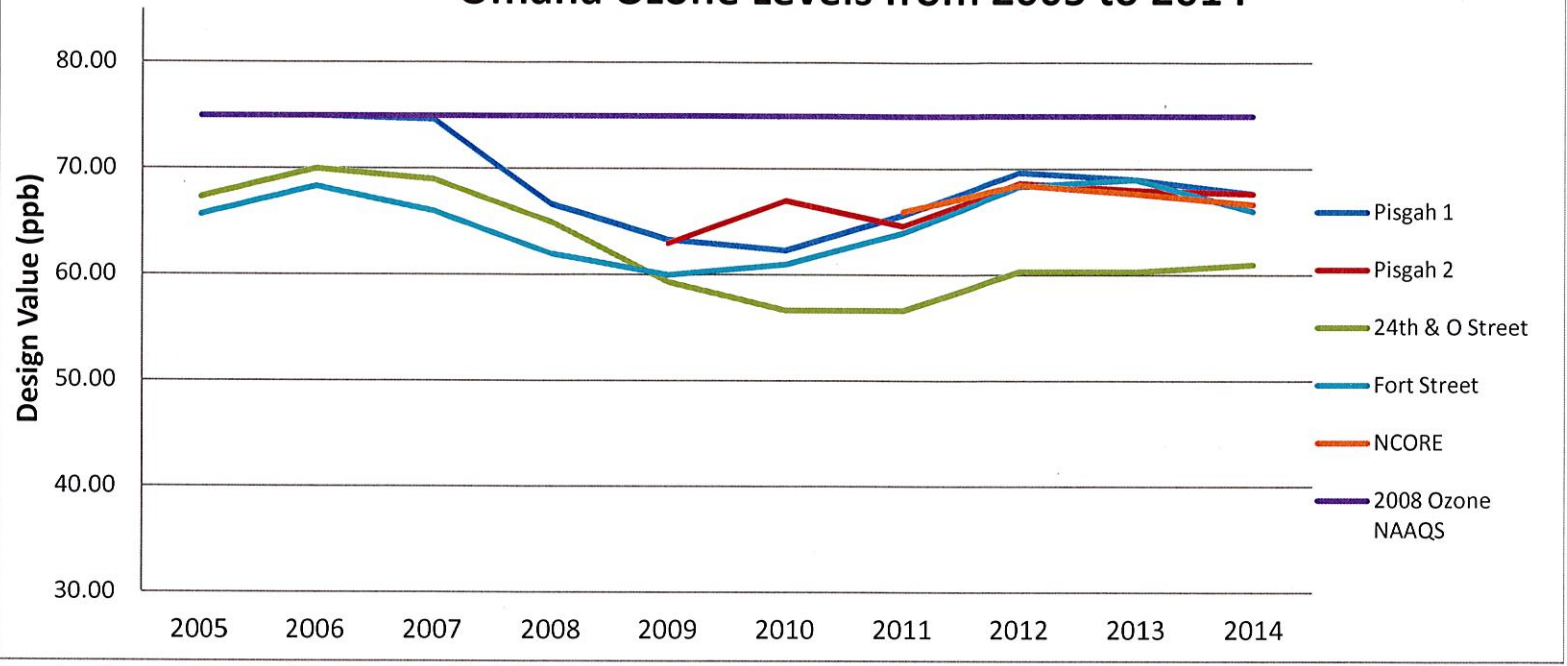
Dear Ms. Bunte:

The City of Omaha's Air Quality Control division (OAQC), Metropolitan Area Planning Agency (MAPA), and Douglas County Health Department (DCHD) are pleased to continue our participation in 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 third 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 update the EPA on the area's ozone reduction efforts in 2013 and 2014 and serve as the "Path Forward" going into 2015.

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:

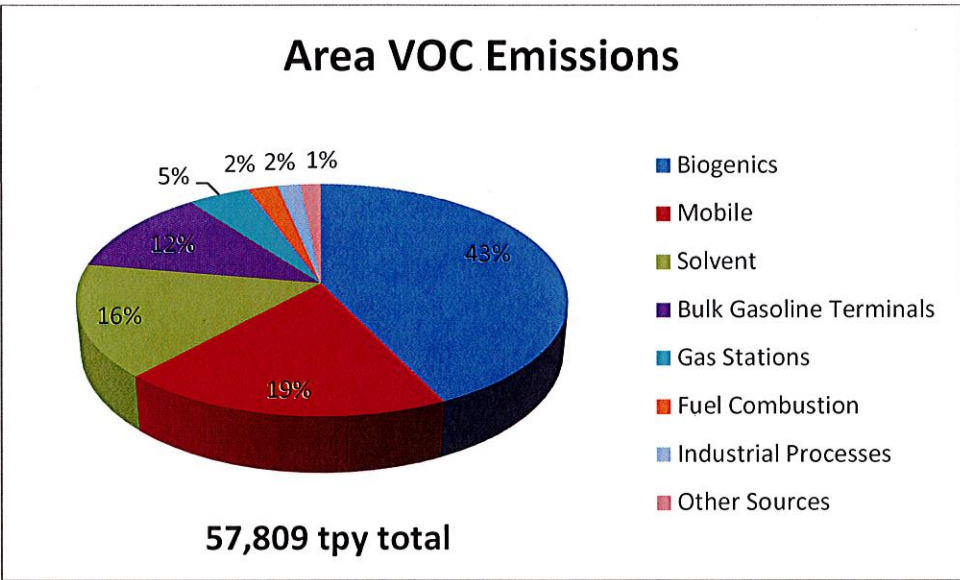
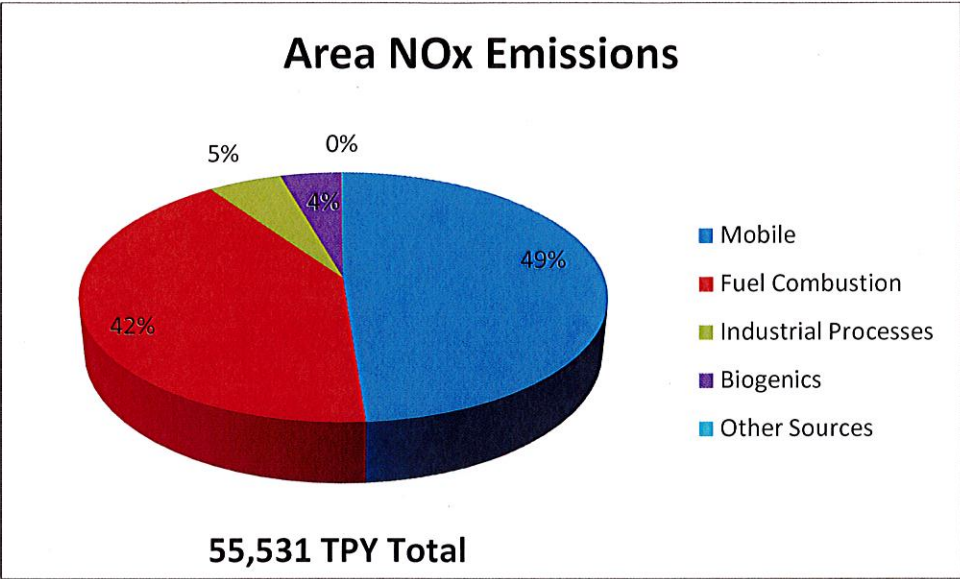
Omaha Ozone Levels from 2005 to 2014



Ozone levels in the Metro area continue to be largely tied to the weather. A mild summer in 2014 brought a slight decline in the monitor design values in the CBSA. However, as the design values remain within the range of 65-70 ppb proposed by the EPA for a new standard to be finalized in 2015, it is imperative that stakeholders in the Omaha-Council Bluffs metro area take steps to reduce emissions of NOx and VOCs to avoid future non-attainment with the ozone standard.

Area Emission Inventory

In the absence of modeling, an area emissions inventory provides the best means for setting targets for emissions reductions. The 2011 NEI – compiled for the area by EPA Region 7 – provides a glimpse into which sectors would be the most beneficial as the focus of our efforts. As the two charts below show, the past strategy of targeting Fuel Combustion and Mobile Source emissions appears to offer the most promise going forward as well.



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.

What Can You Do?



Fill 'er Up Cool. Delay refueling vehicles and equipment until after 7pm.

Choose Clean Air!

Learn More @ LittleStepsBigImpact.com

A message from the Metropolitan Area Planning Agency (MAPA).
Funding provided by Nebraska DEQ, Iowa DNR and EPA Region VII.

As the Little Steps, Big Impact campaign entered its fourth ozone season in 2013, our outreach focus shifted from primarily general ozone-awareness to urging specific action. With the help of Federal Congestion Mitigation for Air Quality (CMAQ) funds, the Omaha-Council Bluffs Ozone Advance Program Held 12 Ozone Awareness Days. These days were spread out one week each in June, July, and August and featured 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 campaign includes extensive television, radio, internet/social media, and bus advertising.

In 2014, the reduced bus fare campaign was focused solely on the month of July, as the month was declared Ozone Awareness Month. This campaign resulted in an average increase of 1,100 riders per reduced bus fare day. The campaign also included extensive television, radio, internet/social media, and bus advertising.

Additionally, MAPA's annual commuter challenge was merged with Live Well Omaha's National Bike Challenge to create a five month-long program focused on promoting all forms of alternative transportation. This program was marketed in conjunction with the Little Steps, Big Impact campaign.

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 (currently 66 ppb ozone) 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.



Ozone Action Day

Alternative Fuel Conversions

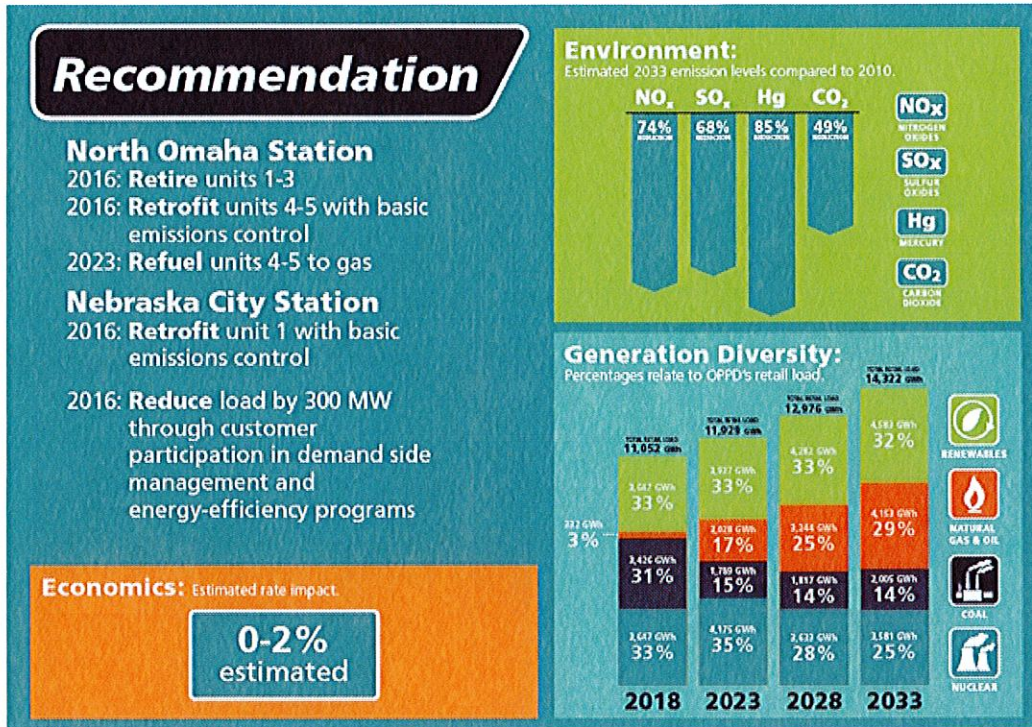
Alternative fuels have been and will continue to be a major focus for voluntary emission reduction efforts from mobile sources. The Metropolitan Utilities District (MUD), the water and natural gas utility for most of the Nebraska side of the Metro area, has been very aggressive in recent years in identifying potential conversion targets from gasoline or diesel vehicles to Compressed Natural Gas (CNG). Since 2010, MUD has converted or added over 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 3 CNG fill stations in the Omaha area, with more possible in the future. These conversions have dramatically reduced NOx emissions in the Metro from these fleets.

Additionally, 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 by the end of 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 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. In 2013, the Omaha and Millard Public School districts switched bus contractors. With this switch, the two school districts replaced nearly their entire fleets (400 buses) of diesel buses with buses fueled by propane autogas. This switch will not only save both school districts money and decrease greenhouse gas consumption, it will also 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.

Other Emission Reduction Efforts

As part of its Mercury and Air Toxics (MATS) rule compliance plan, Omaha Public Power District, the electric utility for most of the Nebraska side of the Metro area, has announced plans to dramatically reduce the emissions from the North Omaha Power Plant – the largest source of NOx emissions on the Nebraska side of the Metro. The plan calls for the retirement of three of the five coal-fired boilers at the plant by 2016, and the refueling of the other two by 2023. Additionally, through existing energy efficiency programs and demand-side management, the utility plans to reduce energy demand by 300 MW in 2016. OPPD estimates that the plan will reduce NOx emissions from North Omaha and its Nebraska City plant (not part of the Omaha-Council Bluffs MSA) by 74%:



In the fall of 2014, the U.S. Department of Transportation announced that Metro, the City of Omaha’s public bus system, would receive a federal TIGER grant for the construction of a Bus Rapid Transit (BRT) line down the main transportation corridor in Omaha. This BRT, expected to begin operation by the end of 2018, will significantly reduce emissions of NOx and VOCs from mobile sources.

Ozone Reduction Efforts Going Forward

Little Steps, Big Impact in 2015

In addition to the Ozone Awareness Days reduced bus fare program, the CMAQ funds for 2013 and 2014 covered the Ozone Awareness Surveys. The surveys conducted after the last two campaigns indicate that a revised approach to the 2015 Little Steps, Big Impact campaign is needed. While the availability of funds will play a large role in determining the exact nature of the 2015 campaign, plans are currently underway to work more directly with some of the Metro area’s largest employers to encourage alternative transportation, including reduced bus fares. This revised approach will seek to capture more choice riders than the past campaigns have captured, thus more effectively reducing ozone precursor emissions from mobile sources.

Ultimately, the Omaha-Council Bluffs Ozone Advance program and its associated awareness campaign will not be effective if it raises awareness but does not produce voluntary emission reduction actions. In 2015 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.

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 revision and continued growth of the Metro area, 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 been successful in securing federal CMAQ funds from both the States of Iowa and Nebraska. 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. After each ozone season, the partners in this Advance Program will evaluate our progress and adjust our efforts accordingly.

The Omaha-Council Bluffs Ozone Advance Program will continue in 2015 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,



Dan May
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Cc: Lachala Kemp, EPA Region VII
Greg Youell, MAPA
Russ Hadan, DCHD