



August 8, 2012

Ozone Advance
c/o Laura Bunte
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards, C304-01
109 TW Alexander Drive
Research Triangle Park, NC 27711

Dear Ms. Bunte:

The City of Wichita would like to participate in Ozone Advance with respect to its metropolitan area. At this time, this reflects the area within Wichita's corporate city limits. However, over the next year, we will seek voluntary stakeholder participants of other local jurisdictions, agencies, businesses, institutions and organizations throughout the entire Wichita Metropolitan Statistical Area (MSA) that covers the counties of Sedgwick, Sumner, Harvey and Butler.

The City of Wichita wishes to join this Ozone Advance Partnership with EPA to preserve or improve air quality in our regional airshed and we meet the program eligibility criteria as follows:

1. None of the four Wichita MSA counties are designated nonattainment areas for either the 1997 8-hour or the 2008 Ozone National Ambient Air Quality Standards (NAAQS).
2. The proposed Ozone Advance region is the Wichita MSA. The four Wichita MSA counties and cities within these four counties will be asked to participate as voluntary stakeholders. It is important to note that for over a decade, the City of Wichita has operated a Wichita Air Quality Improvement Task Force that includes area business, industry and regional stakeholders. This task force has implemented many voluntary improvement actions to date including air quality education to some extent in all four counties. A list of current task force members is attached.
3. Three ozone monitors are located within the Wichita MSA region - near City of Peck in Sumner County; at the Health Department in Wichita in Sedgwick County; and near City of Sedgwick in Sedgwick County.
4. The Kansas Department of Health and Environment (KDHE) has maintained and reported on the inventory of existing emissions on a regular basis.

City Manager's Office

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We understand that our voluntary efforts under Ozone Advance may benefit the Wichita MSA by potentially:

- Reducing air pollution in terms of ozone as well as other air pollutants;
- Ensuring continued healthy ozone levels,
- Maintaining the ozone NAAQS;
- Helping avoid violations of the ozone NAAQS that could lead to a future nonattainment designation,
- Increasing public awareness about ground-level ozone as an air pollutant, and
- Targeting limited resources toward actions to address ozone problems quickly.


We wish to continue working with business, industries, and organizations to identify and implement voluntary programs that result in cleaner air for our citizens. It would benefit us to make every reasonable, voluntary effort to avoid a future nonattainment designation. In addition to the health concerns associated with such a designation, there are tremendous economic impacts. Stricter permitting and emissions requirements imposed when an area is designated as nonattainment will make it more difficult for us to attract new industry and stifle existing industries wishing to expand. New regulations and programs could also increase the cost of gasoline and other goods and services that our community may be forced to bear.

During the course of the next year, we will prepare and provide you with a plan to go forward. We will implement that plan over the next several years and will provide plan updates on an annual basis.

Our goal is to implement measures and programs to reduce ozone in the Wichita MSA region in the near term. We agree it is in our best interest to work together and in coordination with stakeholders and the public to proactively pursue this goal. We understand that participation in this voluntary, proactive program in no way establishes new regulatory requirements nor harms our community's ability to create flexible, innovative approaches that account for the complex nature of ozone, subject to our community's affordability limitations.

If you have any questions regarding this program, please contact Kay Johnson, Wichita Environmental Initiatives Manager and Air Quality Improvement Task Force Chair at (316)268-4251 or kjohnson@wichita.gov.

Sincerely,



Robert Layton
City Manager

cc: Lachala Kemp, EPA Region VII
Tom Gross, Kansas Department of Health and Environment