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**Capital Area Council of Governments**  
6800 Burleson Road  
Building 310, Suite 165  
Austin, Texas 78744  
512-916-6000 • Fax 512-916-6001  
www.capcog.org

May 16, 2012

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

Dear Ms. Bunte:

On behalf of my colleagues in the Central Texas Clean Air Coalition (CAC), I would like to thank EPA for its release of the Ozone Advance program guidance. The CAC comprises representatives from Bastrop, Caldwell, Hays, Travis and Williamson counties and wishes to join this partnership with EPA to preserve and improve our region's air quality. Please consider this letter both our notice to sign up for participation in Ozone Advance and our Path Forward letter.

Our five-county coalition coincides with the Austin-Round Rock-San Marcos Metropolitan Statistical Area (Austin MSA) and we are providing the following information to meet the Ozone Advance program (OAP) eligibility:

- The Austin MSA consists of Bastrop, Caldwell, Hays, Travis, and Williamson counties;
- The Austin MSA is designated as attainment under both the 1997 and 2008 ozone National Ambient Air Quality Standards (NAAQS);
- The following air monitors, maintained by the Texas Commission on Environmental Quality (TCEQ), reflect the air quality in the Austin MSA: Austin Northwest C3/A322 (AQS Number 484530014) and Audubon C38 (AQS Number 484530020); and
- Existing emissions inventory reporting requirements have been met by the TCEQ.

Our region is proud of the air quality gains we have made through participation in the 1-hour Ozone Flex program, the Early Action Compact, and the 8-hour Ozone Flex (8-O3 Flex) program. We understand that our efforts under Ozone Advance may benefit Austin MSA by :

- 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.

The Austin MSA's 8-O3 Flex action plan remains in effect through December 31, 2013. The initial phase of our Path Forward is to continue to rigorously implement the 8-O3 Flex action plan through that date under the auspices of Ozone Advance. Although the existing 8-O3 Flex action plan references the 1997 eight-hour ozone standard, its control measures are not specific to that standard. They will control NOX and VOC emissions as effectively under the 2008 ozone standard as they have under the 1997 standard.

The goal of the action plan under the OAP is to maintain the Austin MSA's compliance with the 2008 ozone standard. For the next step of the Path Forward, participants intend to complete an updated, OAP-specific, action plan before December 31, 2013, when the current plan expires. This revised action plan is expected to carry forward applicable existing measures and build on them. It may include some new measures and newly revised measures for implementation.

We agree with EPA that it is in our best interest to work together and in coordination with stakeholders and the public to pursue this goal proactively. We appreciate EPA's forward-thinking leadership in facilitating the voluntary programs that make such a profound difference in the quality of life and health in our communities.

Our region is eager to get started and several participants are considering applying for a DERA grant. As you know, acceptance into the OAP improves an application's chance of success. If it is possible for you to notify us of our status in the OAP program by the end of May, we would be deeply appreciative.

Sincerely,

A handwritten signature in cursive script that reads "Samuel T. Biscoe". The signature is written in black ink and is positioned above the typed name and title.

Samuel T. Biscoe  
Chairman, Central Texas Clean Air Coalition  
Judge, Travis County, Texas