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Marci Henson, Director

August 18, 2020

Ms. Cristina Davis
Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: CARB Heavy Duty NOx Omnibus Proposal

Dear Ms. Davis:

Clark County Department of Environment and Sustainability (DES) is providing comments on California Air Resources Board's (CARB) proposed "Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments" (HD Omnibus Regulation) announced on June 26, 2020 in the California Regulatory Notice Register 2020, Volume Number 26-Z (p. 930). Although most people think of us as Las Vegas, Nevada, Clark County is all of southern Nevada, and we share a down-wind border with California. DES is the local air quality agency responsible for protecting the quality of the air for over two million citizens and over 40 million annual visitors.

DES strongly supports CARB's effort with the HD Omnibus Regulation to reduce NOx by 90%, improve emission verifications methods, ensure all duty cycles meet the standards, require longer lived controls and warranties, and incorporate emerging technologies for NOx from highway heavy-duty (HD) engines. We estimate that between 10–15% of NOx emissions in the Las Vegas Valley can be attributed to HD engines. Of added significance is the fact that Interstate 15 starts in southern California and passes directly through the heart of Las Vegas and Clark County. Therefore, DES believes that the citizens of Clark County will benefit when every heavy-duty truck traversing the valley complies with the NOx reductions generated by this initiative.

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DES appreciates the opportunity to provide input on CARB's HD Omnibus Regulation and urge that the Board approve this program. If you have any questions related to this, please don't hesitate to contact me at (702) 455-1615 or Sword@clarkcountynv.gov.

Sincerely,



Mike Sword, P.E., CEM, Planning Manager
Clark County Department of Environment and Sustainability

cc:

[Marci Henson, Director, DES]

[Jodi Bechtel, Assistant Director, DES]