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August 20, 2020

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

RE: Proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments

Dear Ms. Davis:

On behalf of the Maricopa County Air Quality Department I am greatly encouraged by and wholeheartedly support the Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments the California Air Resources Board (CARB) has proposed. Maricopa County Air Quality Department (MCAQD) has reviewed the rules and associated technical support documents, and several publicly available reports on additional emissions control technologies for heavy duty diesel engines. The detailed feasibility assessments conclude that much more can be done to cost-effectively reduce emissions of oxides of nitrogen (NOX).

Maricopa County is currently designated a marginal nonattainment area with respect to the 2015 ozone standard. Maricopa County does not have a big industrial base, and as such, the majority of ozone precursor emissions come from mobile sources. Mobile sources are responsible for about 45% of anthropogenic VOC, over 80% for NOx and over 90% of the carbon monoxide emissions in the County. As a result, reducing NOX emissions from mobile sources will be critical to the ability of the County to attain the 2015 ozone standard.

As a downwind jurisdiction that is in nonattainment of the ozone standard, MCAQD appreciates all efforts made by CARB to reduce emissions of ozone precursors. These efforts will directly benefit Maricopa County and other downwind jurisdictions by reducing ozone transport. In addition, due to the high volume of heavy-duty truck traffic that travels from California and through Maricopa County, a cleaner fleet in California is also likely to reduce emissions in Maricopa County and other jurisdictions. If adopted, the Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments will also give other states the ability to reduce emissions from their fleets, even if the U.S. Environmental Protection Agency fails to adopt more stringent standards for heavy-duty engines.

The numerous evaluations that have been conducted regarding the costs and feasibility of additional NOx controls conclude that the technology exists and is both effective and affordable. In addition, the proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments will help Maricopa County attain the 2015 ozone standard. Consequently, I support CARB moving forward with adopting and implementing the proposed rules.

Sincerely,

A handwritten signature in blue ink that reads "Philip A. McNeely".

Philip A. McNeely, R.G.
Director