

**WASHOE COUNTY
HEALTH DISTRICT**
ENHANCING QUALITY OF LIFE

August 25, 2020

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

Subject: Washoe County Code Chapter 110 (Development Code), Article 412 (Landscaping)

Dear Ms. Davis:

The Washoe County Health District, Air Quality Management Division (AQMD) respectfully submits the following comments on the 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). The AQMD supports the establishment of new, more stringent nitrogen oxide (NOx) emission standards and related requirements for heavy-duty trucks and engines across all load levels. Approximately 70 percent of NOx emissions in Nevada are generated by mobile sources, for which federal standards are essential for control and reduction.

Washoe County, Nevada is currently designated attainment for the 2015 ozone National Ambient Air Quality Standard (NAAQS), but recent ozone design values have been 100 percent (or more) of the NAAQS. On-road motor vehicles, including heavy-duty trucks, represent the largest source of NOx emissions in Washoe County. The Washoe County Health District joined EPA's Ozone Advance program in 2016 to improve ozone levels and avoid a nonattainment designation. Reducing air quality impacts from on-road motor vehicles, including heavy-duty trucks, is one of five goals in the Health District's Ozone Advance Path Forward. Freight/goods movement by heavy-duty trucks is a major factor in Northern Nevada's economy. Reno/Sparks is home to many warehouses and distribution centers that generate heavy-duty truck trips. Just east of Reno/Sparks is the world's largest industrial center (Tahoe-Reno Industrial Center), which also generates heavy-duty truck trips. In addition, Interstate 80 is the primary transportation corridor for goods moving east from the Port of Oakland, generating even more heavy-duty truck trips through the Reno/Sparks area. The AQMD has permitting authority for only a very small portion of the county's NOx inventory and NOx reductions from sources subject to AQMD permits will be costly.

AQMD supports the swift establishment of a single national highway heavy-duty truck and engine program. In the absence of such initiative, AQMD supports the new, more stringent standards as proposed in the Heavy-Duty Omnibus Regulations; the proposed standards and regulations will achieve, among others, a reduction in NOx emissions of at least 75 percent from current in-use levels starting with model year 2024 and 90 percent with model year 2027. AQMD supports the implementation and adoption of technologies and compliance and performance testing across all duty cycles of heavy-duty truck operations that will lead to a reduction in NOx emissions.

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Again, thank you for the opportunity to provide comments on the proposed Heavy-Duty Omnibus Regulation. Feel free to contact Mr. Daniel Inouye or me at 775-784-7200 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Francisco Vega". The signature is written in a cursive style with a horizontal line underlining the first name.

Francisco Vega, P.E., MBA
Director, Air Quality Management Division
Washoe County Health District