

WASHOE COUNTY HEALTH DISTRICT

ENHANCING QUALITY OF LIFE

September 21, 2021

Chair Steve Yeager
Legislative Commission
401 S. Carson St.
Carson City, NV 89701

Subject: Clean Cars Nevada - LCB File No. R093-20

Dear Chair Yeager and Members of the Legislative Commission,

The Washoe County Health District, Air Quality Management Division (AQMD) respectfully submits the following comments for the September 1, 2021, State Environmental Commission (SEC) meeting regarding Permanent Regulatory Petition R093-20: Bureau of Air Quality Planning – Low and Zero Emission Vehicle Standards and the Clean Cars Nevada (CCN) initiative. In this letter, the AQMD is communicating our strong support for CCN.

Washoe County's current ambient air quality data is violating the health-based National Ambient Air Quality Standard (NAAQS) for ozone, PM_{2.5} and PM₁₀. The transportation sector accounts for nearly 60% of Washoe County's ozone precursor emissions. The most effective strategies to reduce transportation-related emissions are to: (1) Reduce vehicle miles traveled (VMT), and (2) reduce motor vehicle tailpipe emissions.

With the CCN initiative, the Nevada Division of Environmental Protection (NDEP) proposes to incorporate two programs into the Nevada Administrative Code (NAC). The two programs include: (1) the Low Emission Vehicle (LEV) Program which requires reductions in greenhouse gases, criteria air pollutants, and hazardous air pollutants and (2) Zero Emission Vehicle (ZEV) Program which requires a gradually rising percentage of vehicles sold by auto manufacturers in Nevada to be zero-emission.

It is proven that non-compliance with the any of the Environmental Protection Agency (EPA) health-based standards, including ozone, carries significant health and financial consequences. The EPA has concluded the "breathing ground-level ozone can result in a number of health effects that are observed in broad segments of the population"¹ including respiratory symptoms, decrements in lung function and the inflammation of airways. "In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity"¹. Furthermore, the American Lung Association's September 2020 report, "The Road to Clean Air: Benefits of a Nationwide Transition to Electric Vehicles", reports that transitioning to zero-emission transportation technologies could benefit Nevada by avoiding \$746,431,012 in health costs, 65 premature deaths, 767 asthma attacks, and 3,724 lost workdays in 2050. The reduction of ozone precursor emissions associated with the adoption of the California LEV standards and the ZEV program is critical to the attainment of the ozone NAAQS and the protection of the health and welfare of the citizens in Washoe County.

AIR QUALITY MANAGEMENT

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Reducing tailpipe emissions from the transportation sector is a key strategy in the AQMD's Ozone Advance program to maintain compliance with the ozone NAAQS. Not meeting the NAAQS and a non-attainment designation will have long-term negative public health and economic impacts. A non-attainment designation is a threat to businesses considering relocating, expanding, or remaining in the county.

Again, thank you for the opportunity to provide comments on CCN. The AQMD is available for further discussion and can provide additional input on specific elements. Feel free to contact me at 775-784-7200 if I can be of further assistance.

Sincerely,



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

cc (by email): Legislative Commission (LC@lcb.state.nv.us)

Greg Lovato, NDEP

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¹ U.S. Environmental protection Agency, "Health Effects of Ozone in the General Population", <https://www.epa.gov/ozone-pollution-and-your-patients-health/health-effects-ozone-general-population>