

December 24, 2019

Angela Fuss, AICP
Planning Manager
Community Development Department
City of Reno
P.O. Box 1900
Reno, Nevada 89505

Subject: City of Reno December 2019 Intake

Dear Ms. Fuss:

The Washoe County Health District, Air Quality Management Division (AQMD) respectfully submits comments on the projects listed below.

1. SPR20-00005 (Swope Middle School Addition and Renovation)
2. LDC20-00036 (Splash Express Car Wash)
3. LDC20-00033 (Coffee N' Comics)
4. LDC20-00038 (Sharlands Business Resource Center PUD Amendment)
5. LDC20-00035 (Project TUSK)
6. LDC20-00032 (Brewer's Cabinet Amendment)
7. LDC20-00031 (Caliber Collision Electric Fence)
8. LDC20-00034 (Reno Logistics Center)
9. LDC20-00002 (Verdi Boat and RV Storage)

The following comments support the goals in the City of Reno's Resolution 8189 (Adopted April 13, 2016). The resolution recognizes the collaborative effort needed by regional partners, such as the City of Reno and Health District, to meet federal air quality standards.

These comments also align with the Ozone Advance Path Forward,¹ ReImagine Reno Master Plan, the City of Reno's Sustainability and Climate Action Plan, the 2019 Truckee Meadows Regional Plan, and the AQMD's Ozone Advance presentation at the March 6, 2019 Reno Planning Commission meeting.

1. National Ambient Air Quality Standards (NAAQS): The U.S. Environmental Protection Agency (EPA) establishes health-based NAAQS for six pollutants including ozone. The ozone NAAQS is 0.070 ppm and Washoe County's most recent design value for 2016-18 is 0.071 ppm. Our ozone levels are directly related to our community's vehicle trips, vehicle miles traveled (VMT), motor vehicle fleet mix, industrial activity, and energy

¹ U.S. Environmental Protection Agency; Advance Program Participants - Washoe County, NV;
<https://www.epa.gov/advance/program-participants-washoe-county-nv>;

usage. Not meeting the NAAQS can have long-term negative public health and economic impacts.

2. Ozone Advance Strategies: The AQMD is one of 30 areas in the country currently accepted into EPA's Ozone Advance program. Ozone Advance's primary goal is to encourage local governments to take proactive steps that improve air quality and prevent a "non-attainment" designation for ozone. The most effective approach to implementing Ozone Advance is to include those strategies into each jurisdiction's codes. AQMD will continue to participate in Reno's Title 18 update and is committed to incorporating Ozone Advance strategies into Washoe County and Sparks' codes. Although the following strategies are voluntary, they are not uncommon in areas that are designated as "non-attainment" for the ozone NAAQS.
 - a. Transportation: Motor vehicles are the largest category of ozone precursors (nitrogen oxides and volatile organic compounds). As appropriate, these projects should incorporate elements that minimize: Vehicle trips, VMT, and tailpipe emissions. Examples include connected active transportation networks; employee trip reduction programs; electric vehicle charging infrastructure; park and ride areas; and Safe Routes to School programs.
 - b. Energy: Buildings use large amounts of energy and water. Short-term investments during construction can reduce the consumption of energy and have long-term air quality benefits. As appropriate, these projects should incorporate an ENERGY STAR or LEED construction standard.
 - c. Schools: Schools attract hundreds to thousands of students who must travel to and from school each day. Infrastructure within two miles of a school determines students' transportation choices. Multiple access points before and after school can greatly reduce travel distances for students that walk and bike. As appropriate, these projects should incorporate: Active transportation infrastructure; connectivity; and Safe Routes to School programs.
 - d. Urban Heat Island (UHI): Summertime temperatures in the Truckee Meadows have been increasing for several decades. Warmer temperatures increase ozone formation as well as increase the energy demand for cooling buildings and motor vehicles. As appropriate, these projects should incorporate best practices that minimize factors contributing to Washoe County's UHI such as: Minimizing heat absorbing impervious surfaces; increasing vegetative cover; incorporating cool corridors and islands; applying cool roof practices to all buildings; Low Impact Development (LID) parking lots; and increasing tree canopies.
 - e. Construction Impacts: Off-road motor vehicles, such as construction equipment, are the second largest category of ozone precursor emissions. Grading operations are also a large source of PM₁₀. As appropriate, these projects should: Incorporate contractors with technologies and policies that reduce unnecessary

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engine idling; discourage higher polluting construction equipment (Tier 0 or 1 diesel engines); and encourage cleaner construction equipment (Tier 3 or cleaner diesel engines). Two funding resources for contractors with older diesel construction equipment are: 1) EPA's Diesel Emissions Reduction Act (DERA), and 2) VW Mitigation Funds.

Again, thank you for the opportunity to provide comments on these projects. Feel free to contact 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 above the first name.

Francisco Vega, Director
Air Quality Management Division
Washoe County Health District