



November 15, 2024

Matthew Lakin  
Director, Air & Radiation Division  
ORA-1, USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**RE: Submittal of Clark County's 2015 Ozone NAAQS Attainment Plan for the Las Vegas Valley  
Moderate Nonattainment Area**

Dear Mr. Lakin:


On behalf of Governor Lombardo, as his appointed designee, this letter informs you of the Nevada Division of Environmental Protection's (NDEP) transmittal, submitted electronically to the Environmental Protection Agency's (USEPA) State Planning Electronic Collaboration System (SPeCS), of Clark County's *2015 Ozone NAAQS Attainment Plan for the Las Vegas Valley Moderate Nonattainment Area*. Based on Nevada Revised Statute 445B.205 and Nevada Administrative Code 445B.053, the Administrator of the NDEP has the authority to adopt and submit state implementation plans to the USEPA. The NDEP requests approval of the Ozone attainment plan into the Nevada applicable SIP.

The Las Vegas Valley (Hydrographic Area 212) was designated as a marginal nonattainment area for the 2015 ozone National Ambient Air Quality Standard (NAAQS) effective August 3, 2018. On January 5, 2023, the USEPA determined that the area failed to attain the 2015 ozone NAAQS by the applicable marginal nonattainment date and reclassified the Las Vegas Valley as a moderate nonattainment area. This reclassification established a submission deadline of January 1, 2023, for a moderate attainment plan. On October 18, 2023, EPA issued a finding of failure to submit a moderate attainment plan for the Las Vegas Valley nonattainment area by the required deadline.

Under Sections 172 and 182(b) of the Clean Air Act, Clark County is required to submit a state implementation plan that addresses the following planning requirements for moderate nonattainment areas: emissions inventories, attainment demonstration, nonattainment new source review, 15% rate of progress, reasonably available control measures, reasonably available control technology, motor vehicle inspection and maintenance, contingency measures, and a motor vehicle emissions budget for transportation conformity. This plan fulfills these requirements and resolves the USEPA's finding of failure to submit. It was adopted by the Clark County Board of County Commissioners on November 5, 2024.

If you have any questions regarding this submittal, please contact Ted Lendis, Planning Manager, at (702) 455-1653.

Sincerely,



[Jennifer Carr \(Nov 19, 2024 18:38 PST\)](#)

Jennifer L. Carr, PE, CPM, CEM  
Administrator

cc :

Karina O'Conner, USEPA Region 9  
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