

Appendix A. Supporting Media Coverage for Section 3.1.4

Images and links for media coverage of the September 26, 2020, exceptional event detailed in Section 3.1.4 of the main text is presented below in [Figures A-1 through A-3](#).

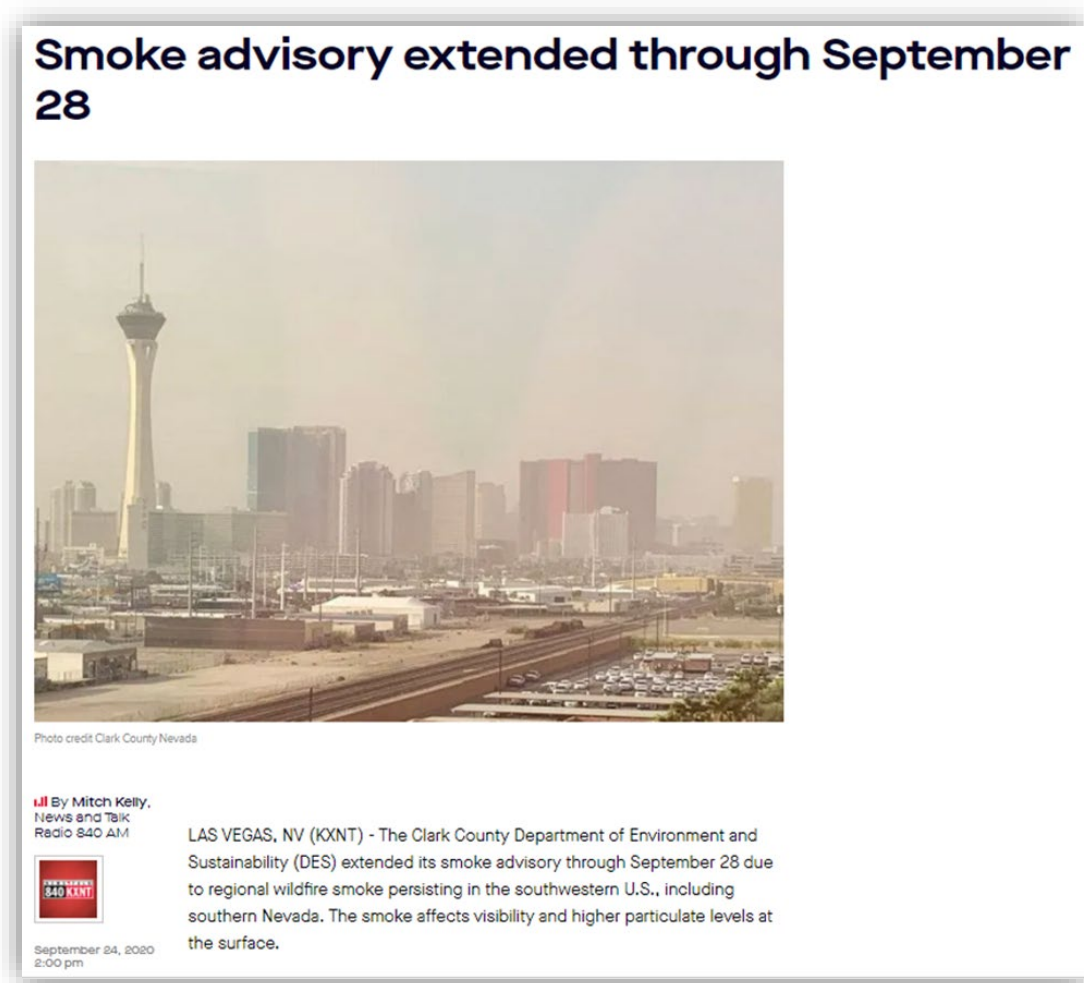


Figure A-1. Article entitled “Smoke Advisory Extended through September 28” (<https://kxnt.radio.com/articles/press-release/smoke-advisory-extended-through-september-28>). Article released by KXNT Radio, a local Las Vegas news outlet, on September 24, 2020.



Figure A-1 (Cont). Article entitled "Smoke Advisory Extended through September 28" (<https://kxnt.radio.com/articles/press-release/smoke-advisory-extended-through-september-28>). Article released by KXNT Radio, a local Las Vegas news outlet, on September 24, 2020.



Figure A-2. News report entitled “Windy changes will help clear our skies” (<https://www.8newsnow.com/weather/windy-changes-will-help-clear-our-skies/>). Report released by 8NewsNow, a local Las Vegas news outlet, on September 25, 2020.

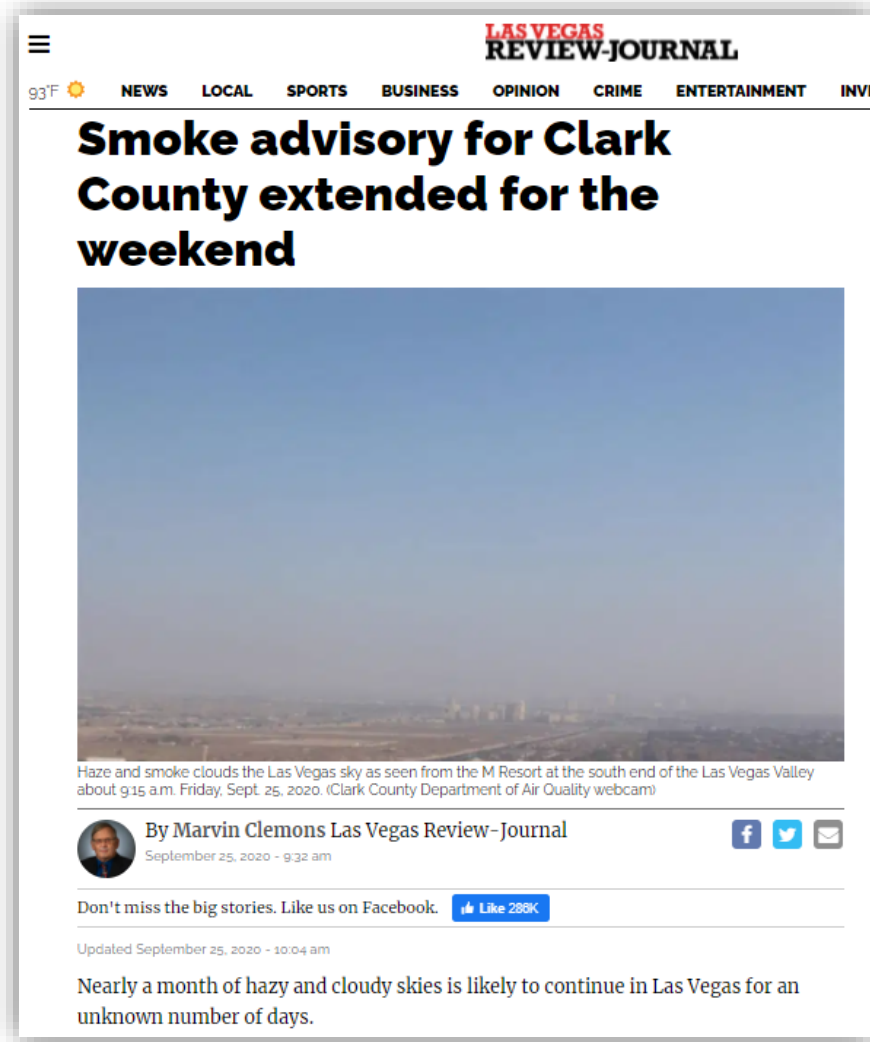


Figure A-3. Article entitled “Smoke advisory for Clark County extended for the weekend” (<https://www.reviewjournal.com/local/local-las-vegas/smoke-advisory-for-clark-county-extended-for-the-weekend-2129747/>). Report released by Las Vegas Review-Journal, a local Las Vegas newspaper, on September 25, 2020.

The majority of Clark County air monitoring stations were showing moderate air quality Friday morning.

Smoke from Western wildfires has clouded the sky for much of September, and the county is forecasting similar conditions through at least Tuesday. A smoke advisory has been extended for the weekend through Monday.

Monitoring sites at Boulder City, Palo Verde and Casino Center were showing good air quality as of 9:15 a.m., while seven others were showing moderate air quality.

“Until the California fires get contained we’re going to have this situation,” said Kevin MacDonald, public information administrator for the Clark County Department of Environment and Sustainability.

People with respiratory issues should limit their outdoor exposure. Changing indoor air filters is also advised.

California fires creating smoke

One of the biggest fires in Southern California that is sending smoke toward Las Vegas is the 114,000-acre Bobcat Fire burning in the San Gabriel Canyon northeast of Pasadena.

It started Sept. 6 and is 55 percent contained. Fire officials say it may be 100 percent contained by Sept. 30.

The Lake Fire has burned more than 31,00 acres west of Lancaster, California. It is 95 percent contained, but firefighters expect it will take until Oct. 12 to completely contain the fire.

The closest fire to Las Vegas, a 1,600-acre fire southeast of Mesquite, is sending some smoke into Arizona and Utah.

Figure A-3 (Cont). Article entitled “Smoke advisory for Clark County extended for the weekend” (<https://www.reviewjournal.com/local/local-las-vegas/smoke-advisory-for-clark-county-extended-for-the-weekend-2129747/>). Report released by Las Vegas Review-Journal, a local Las Vegas newspaper, on September 25, 2020.

Air Quality Index (AQI) maps, daily air quality forecasts, and event notifications are available on the DES website (<https://clarkcountynvairquality.meteostar.com/>). Air quality forecasts and current data are also available through EPA’s AirNow and EnviroFlash systems. DES issues air quality advisories and alerts to warn the public and regulated community if unhealthy levels of a regulated pollutant are anticipated and to provide recommendations on reducing exposure and emissions. Advisories are issued when forecast conditions are favorable for pollutant levels to exceed the NAAQS – i.e., to reach the Unhealthy for Sensitive Groups (USG) level on the AQI, or when public health and safety might be in danger. Alerts are issued when air quality levels have already reached the AQI USG level or are expected to reach that level. **Figure A-4** provides the concentration and AQI values for all NAAQS pollutants in the Metropolitan/Non-Metropolitan and Greater Las Vegas Metro Area on

September 26, 2020. This information was publicly available during the September 26 potential exceptional event. In addition to the near-real-time data available on the DES website, 5-day AQI forecasts were available on September 26 and currently are available to the public here: https://aqportal.clarkcountynv.gov/DES_AQ_Forecast.

Figure A-5 shows the public Air Quality Advisory/News Release for the 2020 ozone season, and Figure A-6 shows the public Air Quality Advisory/News Release for September 24-28, 2020. Additional media coverage and publicly available AirNow AQI maps for the September 26 potential exceptional event date are included in Section 3.1.2 and Section 3.1.4 of the main report.

Reporting for September 26, 2020																		
September 26 2020 Select a Different Date																		
Metropolitan Area or Non-Metropolitan County	Air Quality Rating	Critical Pollutant	Air Quality Index															
			Ozone				Carbon Monoxide		Sulfur Dioxide		Nitrogen Dioxide		PM-10 (Std Cond)		PM-2.5 (Lcl Acpt)		PM-2.5 (Lcl Cond)	
			1-Hour		8-Hour		8-Hour		1-Hour		1-Hour		24-Hour		24-Hour		24-Hour	
			AQI	ppb	AQI	ppb	AQI	ppm	AQI	ppb	AQI	ppb	AQI	µg/m³ (25° C)	AQI	µg/m³ LC	AQI	µg/m³ LC
Clark County -- Region 1																		
Apex	Moderate	Ozone	*	65	58	57												
Boulder City	Moderate	Ozone	*	60	64	59						23	25.32					
Greater Las Vegas	Unhealthy for sensitive groups	Ozone	*	86	115	75	10	0.844	1	1.0	37	39.0	48	51.50		59	16.15	
Indian Springs	Moderate	Ozone	*	60	61	58												
Jean	Moderate	Ozone	*	65	77	63							35	38.19		54	13.99	
Mesquite	Good	Ozone	*	55	44	48												
Monitoring Sites in the Greater Las Vegas Metro Area	Air Quality Rating	Critical Pollutant	Air Quality Index															
			Ozone				Carbon Monoxide		Sulfur Dioxide		Nitrogen Dioxide		PM-10 (Std Cond)		PM-2.5 (Lcl Acpt)		PM-2.5 (Lcl Cond)	
			1-Hour		8-Hour		8-Hour		1-Hour		1-Hour		24-Hour		24-Hour		24-Hour	
			AQI	ppb	AQI	ppb	AQI	ppm	AQI	ppb	AQI	ppb	AQI	µg/m³ (25° C)	AQI	µg/m³ LC	AQI	µg/m³ LC
Clark County	Unhealthy for sensitive groups	Ozone	*	86	115	75	10	0.844	1	1.0	37	39.0	48	51.50		59	16.15	
Casino Center	Good	Nitrogen Dioxide								35	37.4							
Green Valley	Moderate	Ozone	*	68	64	59						33	35.15			47	11.75	
Jerome Mack	Moderate	PM-2.5	*	66	54	56			1	1.0	37	39.0	45	48.42		57	15.22	
Joe Neal	Unhealthy for sensitive groups	Ozone	*	86	115	75					13	13.3	47	50.98		54	13.82	
Palo Verde	Moderate	Ozone	*	74	87	66							32	34.82				
Paul Meyer	Moderate	Ozone	*	83	97	69							31	33.59		53	13.37	
Rancho & Teddy	Moderate	PM-2.5					7	0.652			35	37.1				54	13.70	
Sunrise Acres	Moderate	PM-2.5					10	0.844			35	37.6	48	51.50		59	16.15	
Walter Johnson	Unhealthy for sensitive groups	Ozone	*	86	101	71							34	36.27		51	12.47	

Figure A-4. AQI values reported by the Clark County Department of Environment and Sustainability on September 26, 2020.



News Release

County Commission:
 Marilyn Kirkpatrick, Chairman
 Lawrence Weekly, Vice Chairman
 Larry Brown
 James B. Gibson
 Justin Jones
 Michael Naft
 Tick Segerblom
 Yolanda King, County Manager

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Contact: Kevin J MacDonald
 Public Information Officer

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 E-mail: kevmac@ClarkCountyNV.gov

For Immediate Release

Tuesday, March 31, 2020

Seasonal Ozone Advisory Issued Through September

The Clark County Department of Environment and Sustainability issued a season-long advisory for ground-level ozone pollution today that will be in effect from Wednesday, April 1 – Wednesday, Sept. 30.



Ozone is a colorless gas that exists naturally in the Earth's upper atmosphere. At ground level, ozone is a key ingredient of urban smog that can build up during the day in the hottest months of the year because of strong sunlight, hot temperatures, gasoline and chemical vapors, and pollutants from automobiles, wildfires and regional transport. Exposure to ozone can irritate your respiratory system and cause coughing, a sore throat, chest pain and shortness of breath even in healthy people, according to the EPA.

"Even though we're continuing to Stay Home for Nevada as we and the rest of the country work through the COVID-19 pandemic, it is important to remind the community that ozone increases during the warmer months," said Department of Environment and Sustainability Director Marci Henson. "Our Air Quality Division continues to be an essential service to Clark County by enforcing federal, health-based standards. We also remind people they play an important role in helping reduce ground-level ozone."

HELPFUL TIPS TO REDUCE OZONE

Because cars, trucks and other vehicles are major contributors to ozone, people can follow these helpful, everyday tips to reduce ozone:

- Reduce driving – combine errands into one trip.
- Don't idle your car engine unnecessarily.
- Use mass transit or carpool.
- Fill up your gas tank after sunset. Try not to spill gasoline when filling up and don't top off your tank.
- Keep your car well maintained.
- Consider landscaping that uses less water and gas-powered equipment to maintain.
- Turn off lights and electronics when not in use. Less fuel burned at power plants means cleaner air.

[more]

Clark County news releases may be found at www.ClarkCountyNV.gov.
 You may also follow the County on more than 40 social media sites, including Facebook, Twitter, Instagram, LinkedIn, NextDoor, Pinterest and YouTube.

Figure A-5. Seasonal Ozone Advisory issued by the Clark County Office of Public Communication on March 31, 2020, for the 2020 Ozone Season (April 1 to September 30, 2020).

News Release

Environment and Sustainability Seasonal Ozone Advisory, cont.

Also, if you have respiratory issues or other health concerns, consider these tips during ozone season:

- Reduce the time you are active outdoors when ozone levels are elevated, especially if you are engaged in a strenuous activity or have a respiratory disease.
- Schedule activities for the morning or evening when ozone levels are usually lower.
- Substitute a less intense activity – walking instead of jogging, for example.
- Always consult your doctor first for medical advice.

STAY UP TO DATE WITH AIR QUALITY INFORMATION

The Department of Environment and Sustainability monitors air pollution through a network of monitoring sites throughout the Las Vegas Valley. Data is collected from these sites and reported at our monitoring website: AirQuality.ClarkCountyNV.gov. People can stay informed through a couple channels:

- Twitter and Facebook: Read air quality updates in your Facebook news feed or tweets. On Facebook: www.facebook.com/SustainClarkCounty and Twitter: [@SustainClarkCty](https://twitter.com/SustainClarkCty).
- EnviroFlash: Receive daily text or email messages with the latest air quality information. Learn more at www.enviroflash.org. The Dept. of Environment and Sustainability also issues advisories and alerts for ozone and other pollutants such as dust, smoke and other particulate matters.
- AIRNow: Check air quality forecasts, current conditions and the Air Quality Index (AQI) for Clark County at AIRNow's website.

###

Clark County is a dynamic and innovative organization dedicated to providing top-quality service with integrity, respect and accountability. With jurisdiction over the world-famous Las Vegas Strip and covering an area the size of New Jersey, Clark is the nation's 11th-largest county and provides extensive regional services to more than 2.3 million citizens and 45 million visitors a year. Included are the nation's 9th-busiest airport, air quality compliance, social services and the state's largest public hospital, University Medical Center. The County also provides municipal services that are traditionally provided by cities to about 1 million residents in the unincorporated area. Those include fire protection, roads and other public works, parks and recreation, and planning and development.

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Figure A-5 (cont.). Seasonal Ozone Advisory issued by the Clark County Office of Public Communication on March 31, 2020, for the 2020 Ozone Season (April 1 to September 30, 2020).



News Release

County Commission:
 Marilyn Kirkpatrick, Chairman
 Lawrence Weekly, Vice Chairman
 Larry Brown
 James B. Gibson
 Justin Jones
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Contact: Kevin J. MacDonald
 Public Information Officer

Mobile: 702-232-0931
 E-mail: KevMac@ClarkCountyNV.gov

For Immediate Release

Thursday, Sept. 24, 2020

Smoke Advisory Extended Through Monday Due to Wildfire Smoke

The Clark County Department of Environment and Sustainability (DES) is extending its current smoke advisory **through Monday, Sept. 24** due to regional wildfire smoke persisting in the southwestern U.S., including southern Nevada. The smoke affects visibility and higher particulate levels at the surface.



Smoke is made of small dust particles and other pollutants that can aggravate respiratory diseases and contribute to ground-level ozone formation. Smoke and other pollutants can aggravate respiratory diseases such as bronchitis and asthma or heart disease. Consult your physician if you have a medical condition that makes you sensitive to air quality conditions. Under today's conditions, it may be best for children, the elderly and people with respiratory and heart disease to stay indoors.

HELPFUL TIPS TO LIMIT PERSONAL EXPOSURE TO SMOKE

- Limit outdoor exertion on days with high levels of fine particles in the air. Exercise makes you breathe heavier and increases the amount of particulates you are likely to inhale.
- Keep windows and doors closed.
- Consider changing your indoor air filters if they are dirty.

STAY UP TO DATE WITH AIR QUALITY INFORMATION

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- AIRNow: Check air quality forecasts, current conditions and the Air Quality Index (AQI) for Clark County at AIRNow's website.

[more]

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Figure A-6. Smoke and Ozone Advisory issued by the Clark County Office of Public Communication on September 24, 2020, for September 24-28, 2020.

News Release

Smoke Advisory Extended Through Monday Due to Wildfire Smoke, cont.

About the Department of Environment and Sustainability

The Department of Environment and Sustainability is the air pollution control agency, regional Endangered Species Act compliance program, and sustainability office for all of Clark County, Nevada. Established as the Department of Air Quality by the Clark County Commission in 2001, it was renamed in 2020 and is comprised of three divisions: Air Quality, Desert Conservation Program and Office of Sustainability. Through these three divisions, DES is ensuring the air we share meets healthful, regulatory standards, administering the County's Multiple Species Habitat Conservation Plan and addressing climate change.

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Figure A-6 (cont.). Smoke and Ozone Advisory issued by the Clark County Office of Public Communication on September 24, 2020, for September 24-28, 2020.

Appendix B. Supporting Figures for Section 3.2.3

In addition to MODIS AOD and AIRS CO satellite retrievals, we also examined OMI retrievals of tropospheric NO₂ (Figure B-1). However, over the wildfires in central and southern California, NO₂ retrievals are not available and NO₂ over Clark County is likely just due to urban source effects. Therefore, NO₂ does not provide strong evidence for or against smoke impacts in Clark County during the September 26, 2020, exceptional event.

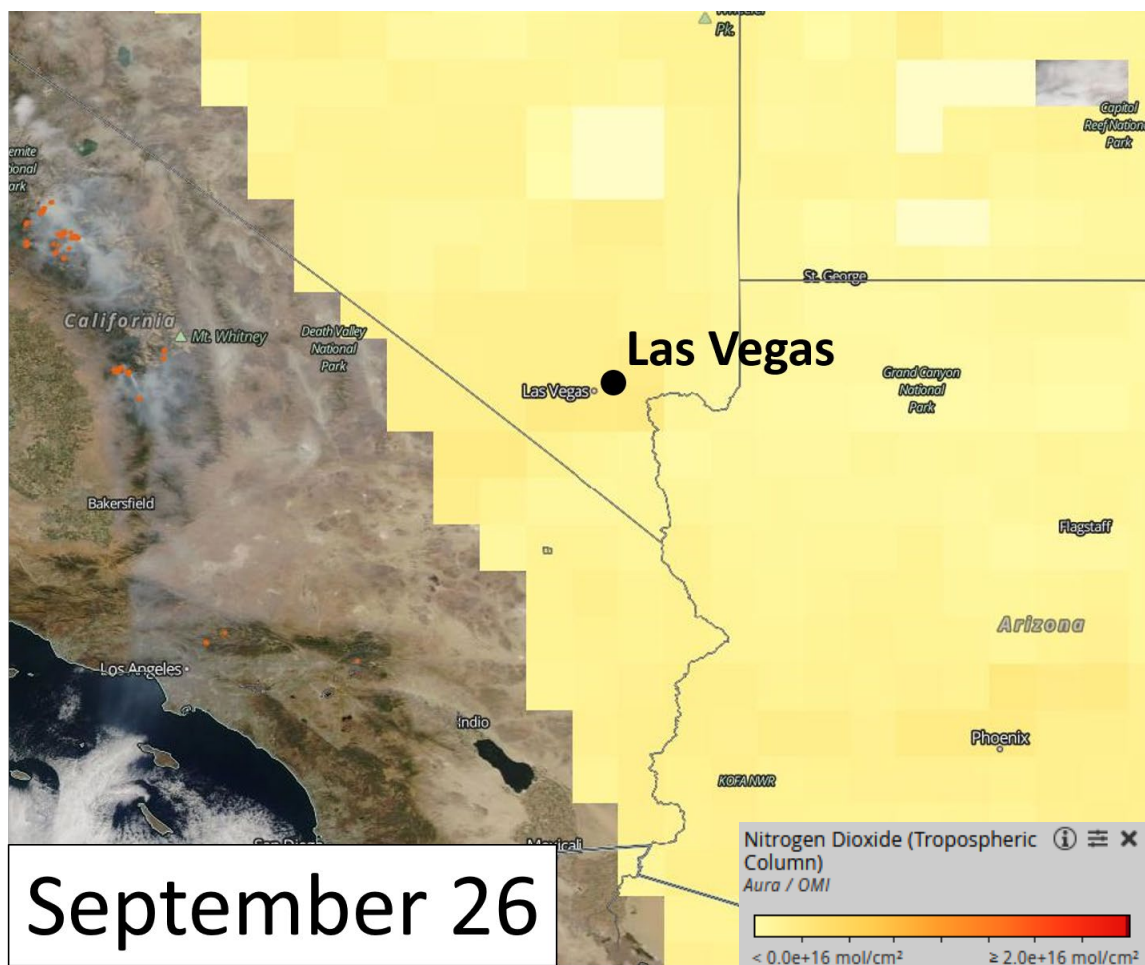


Figure B-1. OMI Aura NO₂ retrieval for the EE on September 26, 2020.

Appendix C. Supporting Figures for Section 3.2.4

The ratio of $PM_{10}/PM_{2.5}$ is examined at each event site where $PM_{2.5}$ and PM_{10} data are available in [Figures C-1 through C-2](#) to determine if a dust event had a significant contribution to abnormal $PM_{2.5}$ concentrations in Clark County during the event period. Elevated $PM_{2.5}$ concentrations that are caused by a dust event can be identified by an even greater increase in PM_{10} . In other words, there would be an accompanying increase in the $PM_{10}/PM_{2.5}$ ratio. Contributions to $PM_{2.5}$ concentrations due to a dust event could confound the assertion that wildfire influence in Clark County can be identified by elevated or abnormal levels of $PM_{2.5}$. As seen in the following figures, the daytime rise in $PM_{2.5}$ at each site on September 26 was not accompanied by an increase in the $PM_{10}/PM_{2.5}$ ratio. Throughout the event period, the $PM_{10}/PM_{2.5}$ ratio remained near or below the expected average at both sites. This demonstrates that a dust event did not significantly contribute to the elevated $PM_{2.5}$ concentrations measured in Clark County on September 26, 2020, lending evidence to the assertion that wildfire smoke was present at the surface.

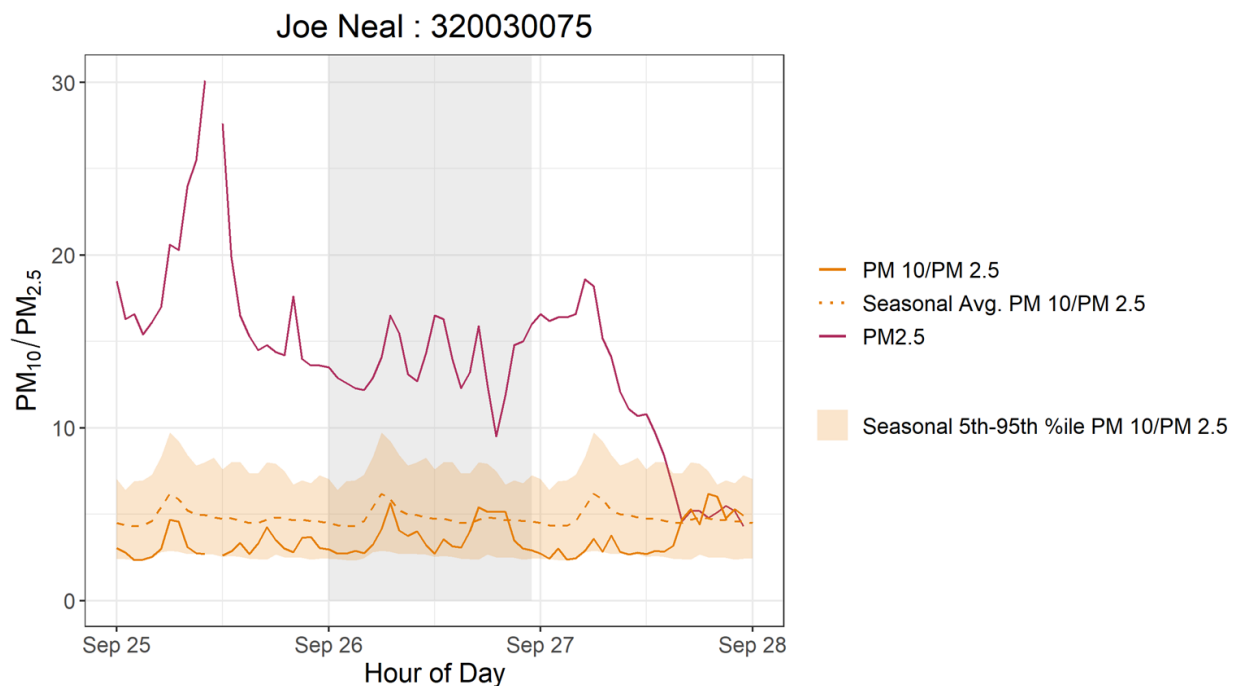


Figure C-1. $PM_{10}/PM_{2.5}$ ratio (yellow) and $PM_{2.5}$ (maroon) concentration at Joe Neal during the September 26, 2020, event period. The seasonal average hourly $PM_{10}/PM_{2.5}$ ratio is shown as a dashed line, and the 5th-95th percentile seasonal average hourly $PM_{10}/PM_{2.5}$ ratio is shaded in yellow. The gray bar highlights September 26, 2020.

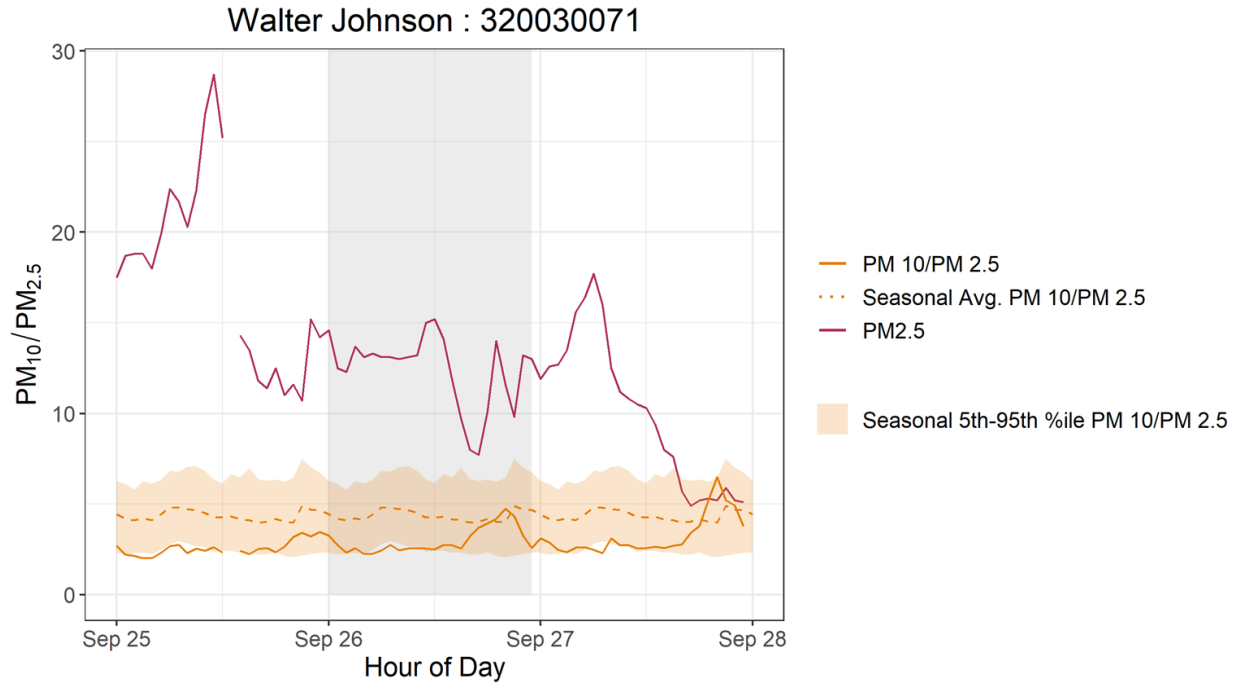


Figure C-2. PM₁₀/PM_{2.5} ratio (yellow) and PM_{2.5} (maroon) concentration at Walter Johnson during the September 26, 2020, event period. The seasonal average hourly PM₁₀/PM_{2.5} ratio is shown as a dashed line, and the 5th-95th percentile seasonal average hourly PM₁₀/PM_{2.5} ratio is shaded in yellow. The gray bar highlights September 26, 2020.

Appendix D. Supporting Figures and Documents for Section 3.3.2

The subset of meteorologically similar days included in the similar day analysis in Section 3.3.2 includes a date, June 8, 2018, when ozone measurements in Clark County exceeded the 70-ppb standard. **Figure D-1** below shows the 18:00 UTC HRRR smoke forecast on June 8, 2018, with smoke particles present in Clark County at the near-surface level. However, modelled HYSPLIT trajectories ending at 12:00 UTC do not show air intersecting any smoke plumes on June 8, 2018 (**Figure D-2**). Air comes from the Los Angeles basin which is a reliable source of elevated ozone. In contrast, modelled HYSPLIT trajectories ending at 12:00 UTC on the event date show air arriving in Clark County from the same general direction, but northward of the main urban center of Los Angeles (Figure C-2). Further, the overlaid HMS Smoke and Fire products in the plot of September 26, 2020, conditions show air trajectories intersecting a smoke plume, and further, the expansion of the smoke plume into Nevada, directly north of Clark County.

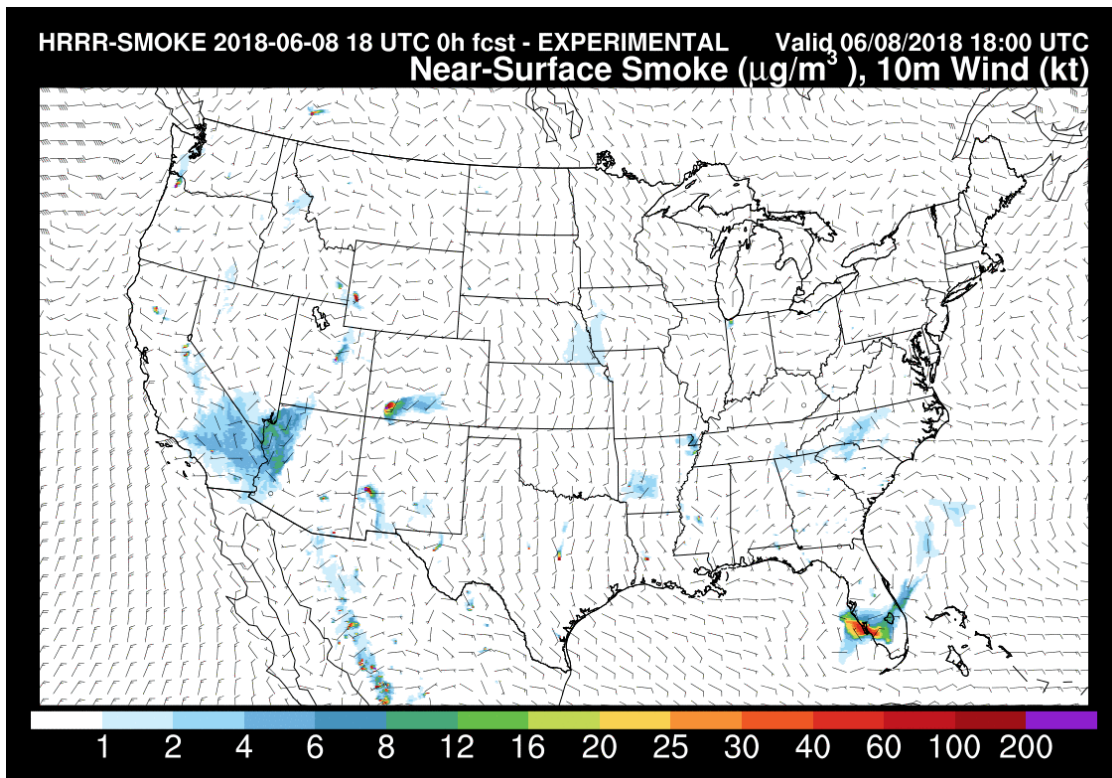


Figure D-1. HRRR-SMOKE forecast for June 8, 2018, at 18:00 UTC.

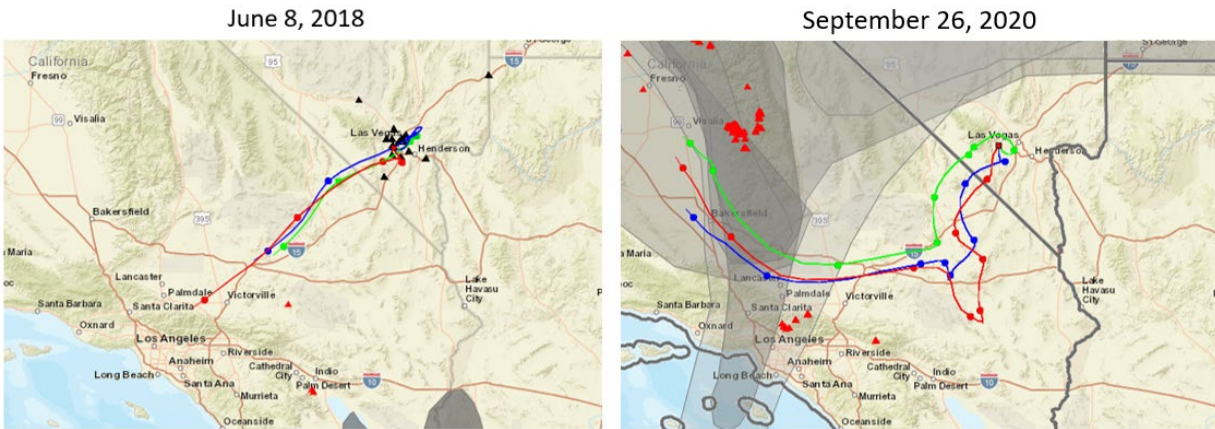


Figure D-2. 50 m (green), 500 m (blue) and 1,000 m (green) HYSPLIT back-trajectories ending at 12:00 UTC on June 8, 2018, and September 26, 2020, calculated using NAM 40-km and NAM 12-km meteorology respectively. HMS Smoke and Fire products are overlaid. Shaded grey areas represent the extent of smoke plumes on each date, and red triangles represent active fires.

Identification of matching meteorologically similar days includes a comparison of meteorology maps between September 26, 2020, and each date subset from candidate matching days. Surface and upper-level maps for September 26, 2020, and each date listed in Table 3-14 (see Section 3.3.2) show highly consistent conditions. All dates show a surface low pressure system over Clark County. Surface maps for September 26, 2020, and each date in Table 3-14, are shown in [Figure D-3 through D-14](#). Upper-level maps show a very low gradient of height contours at 500 mb and an upper-level region of high pressure over Clark County. 500 mb maps for September 26, 2020, and each date in Table 3-14 are shown in [Figure D-15 through D-26](#).

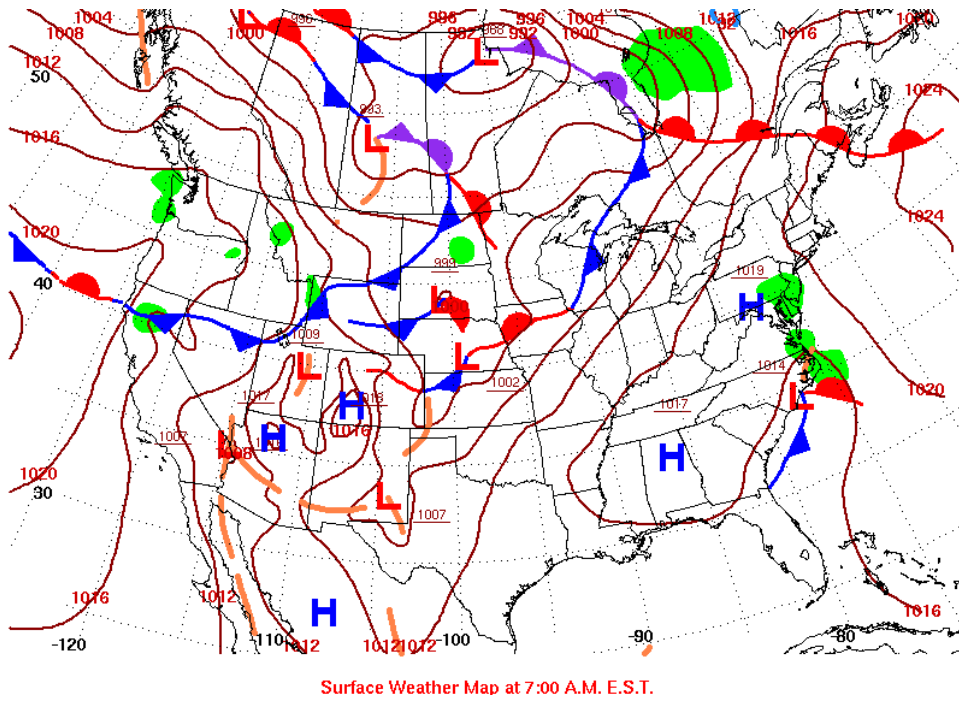


Figure D-3. Surface meteorology map on September 26, 2020 (the event date).

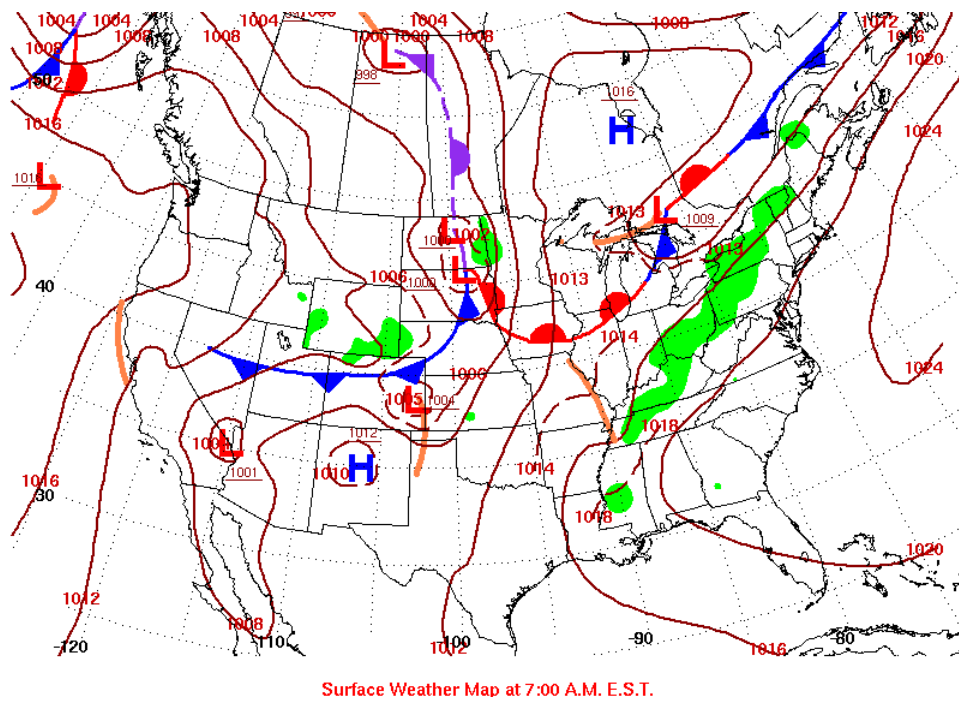


Figure D-4. Surface meteorology map on August 31, 2014.

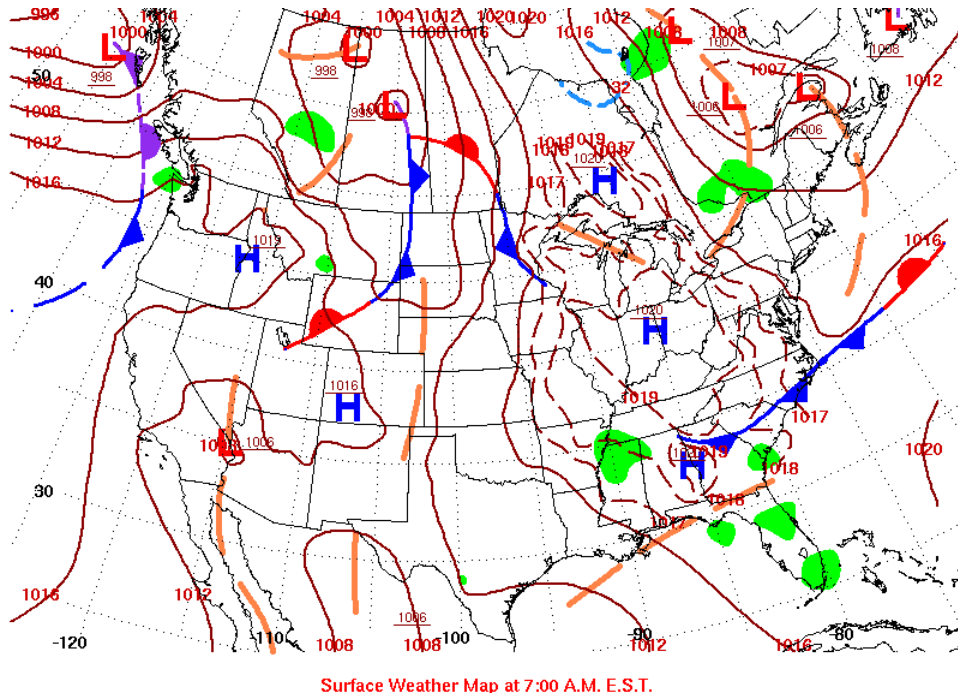


Figure D-5. Surface meteorology map on June 2, 2017.

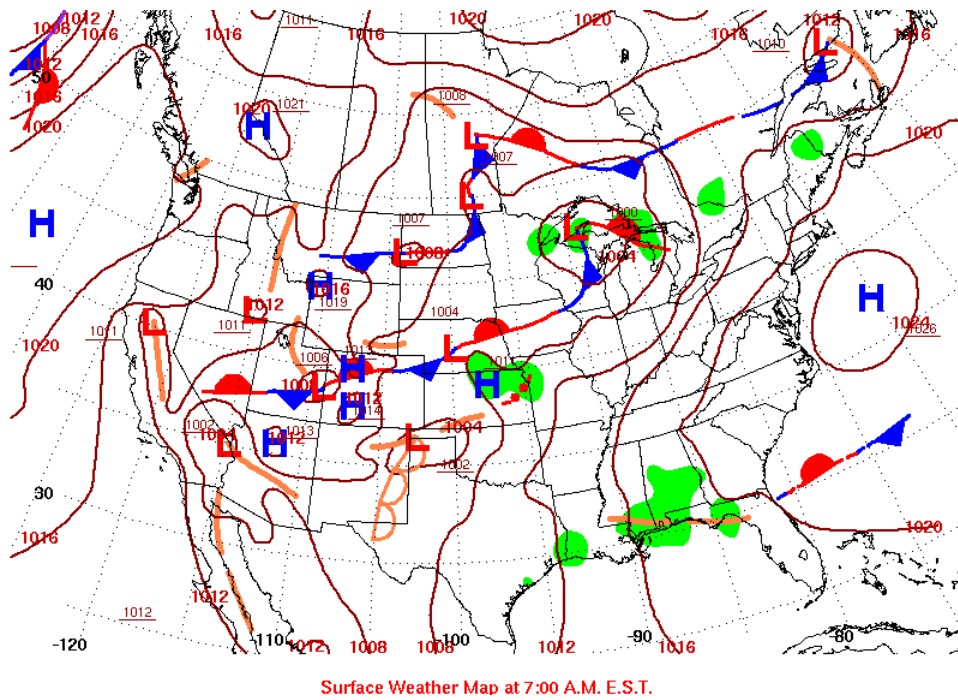


Figure D-6. Surface meteorology map on June 29, 2017.

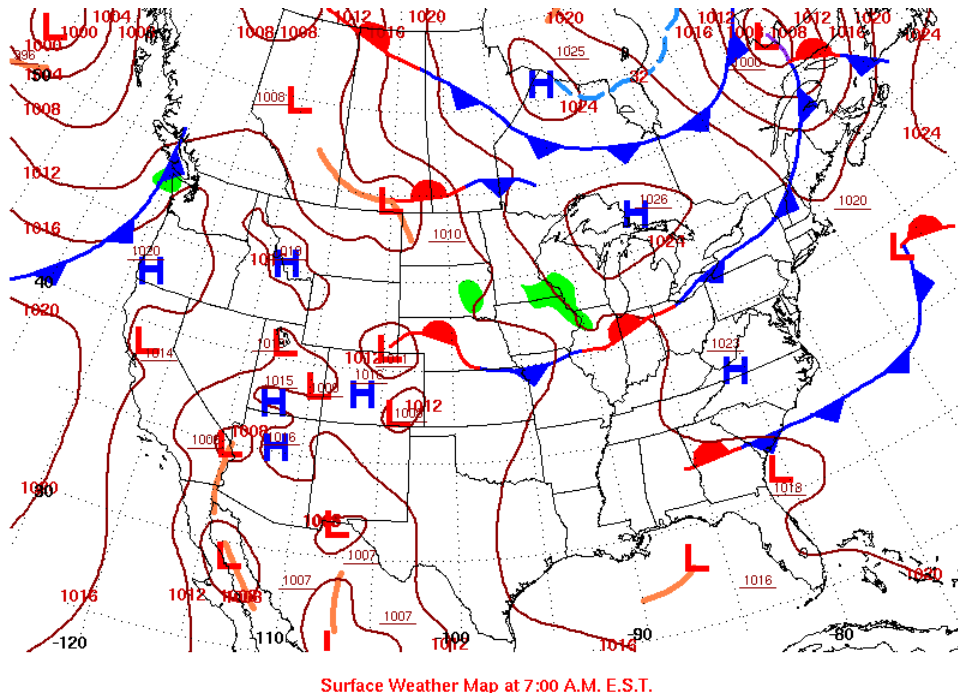


Figure D-7. Surface meteorology map on June 8, 2018.

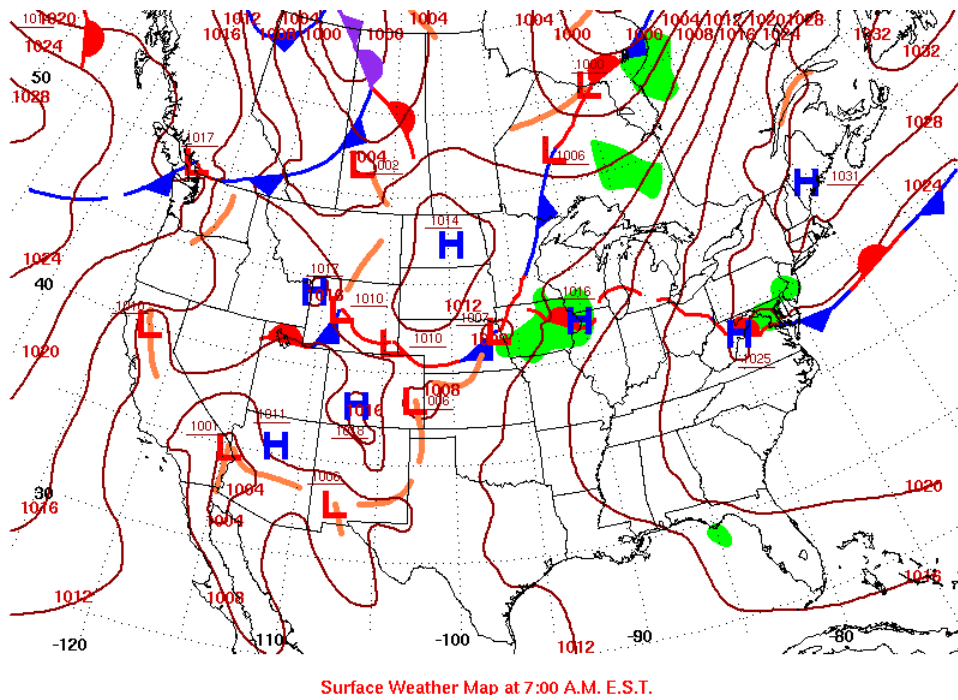


Figure D-8. Surface meteorology map on September 1, 2018.

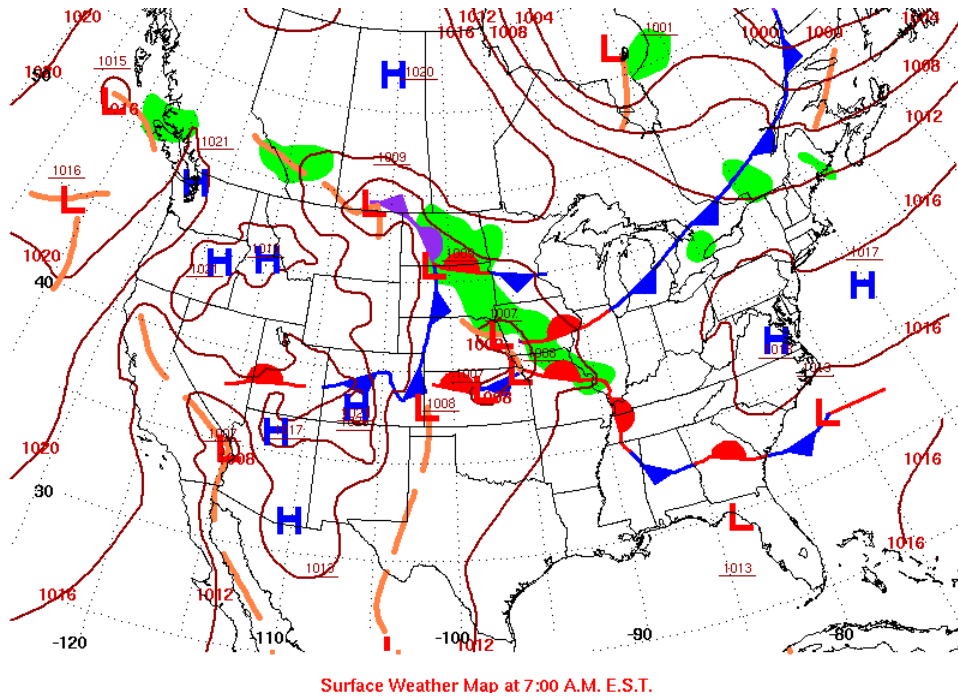


Figure D-9. Surface meteorology map on August 12, 2019.

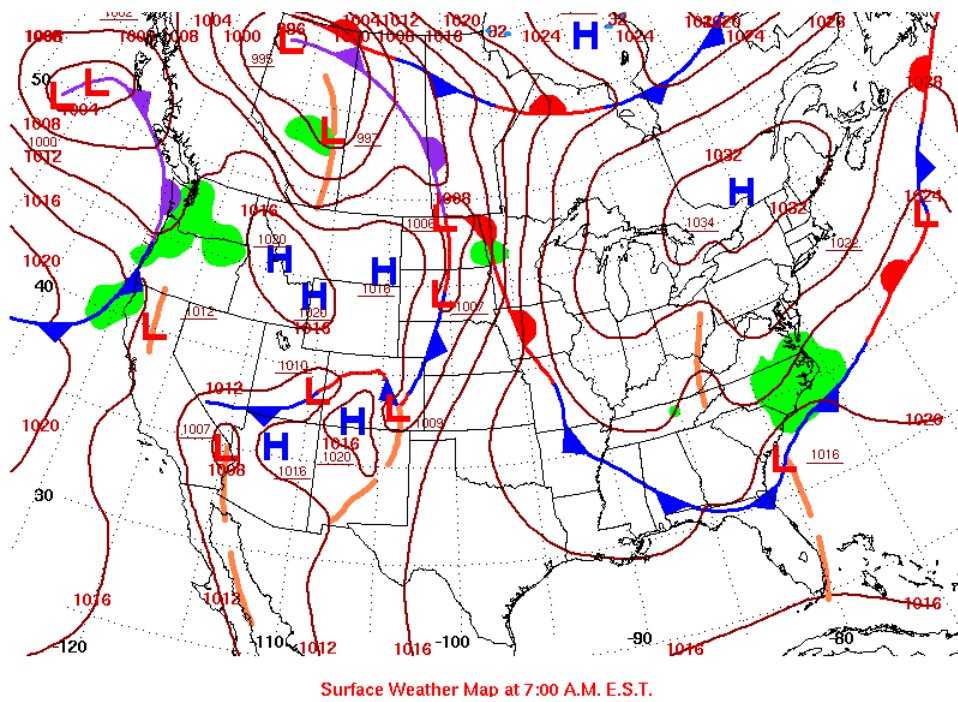


Figure D-10. Surface meteorology map on June 15, 2020.

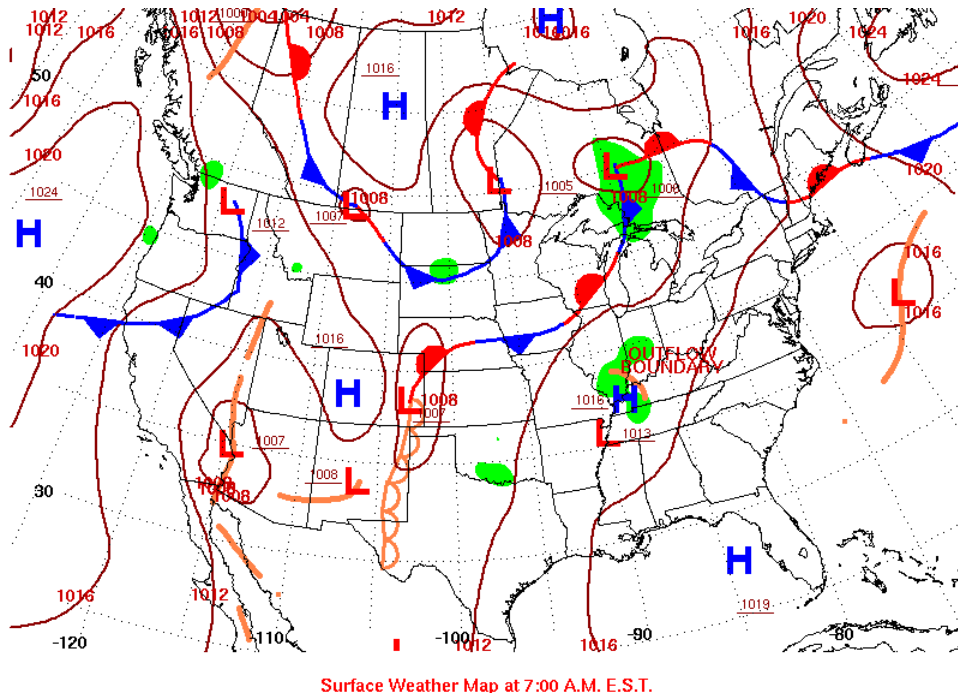


Figure D-11. Surface meteorology map on June 21, 2020.

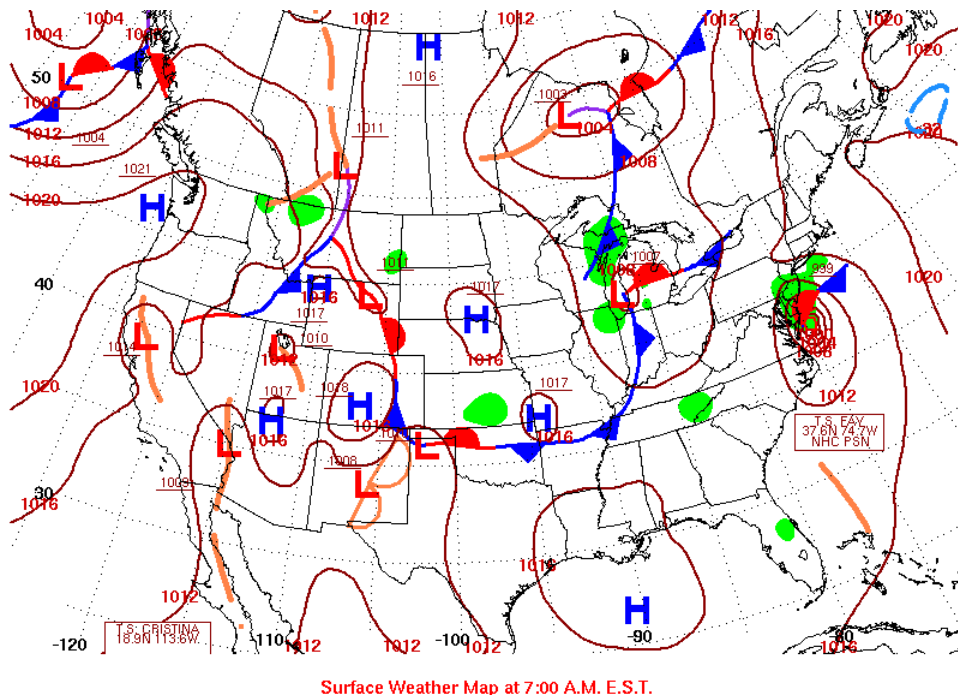


Figure D-12. Surface meteorology map on July 10, 2020.

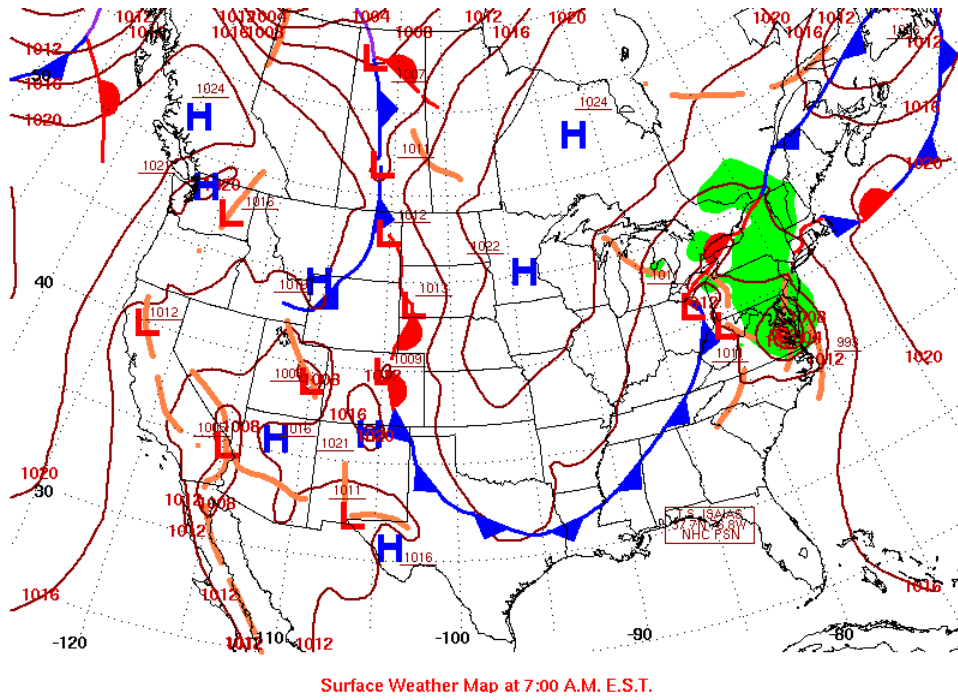


Figure D-13. Surface meteorology map on August 4, 2020.

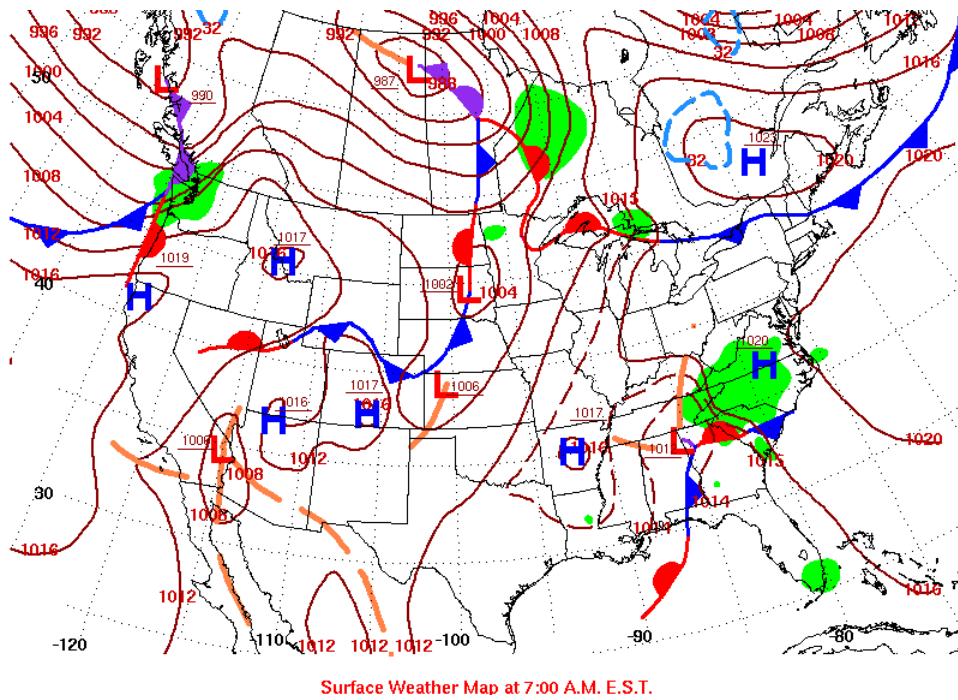
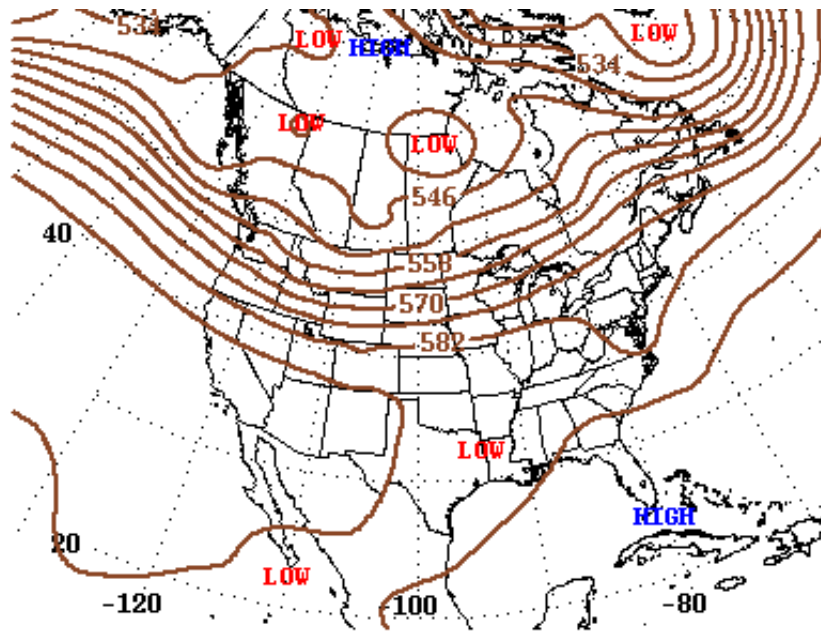
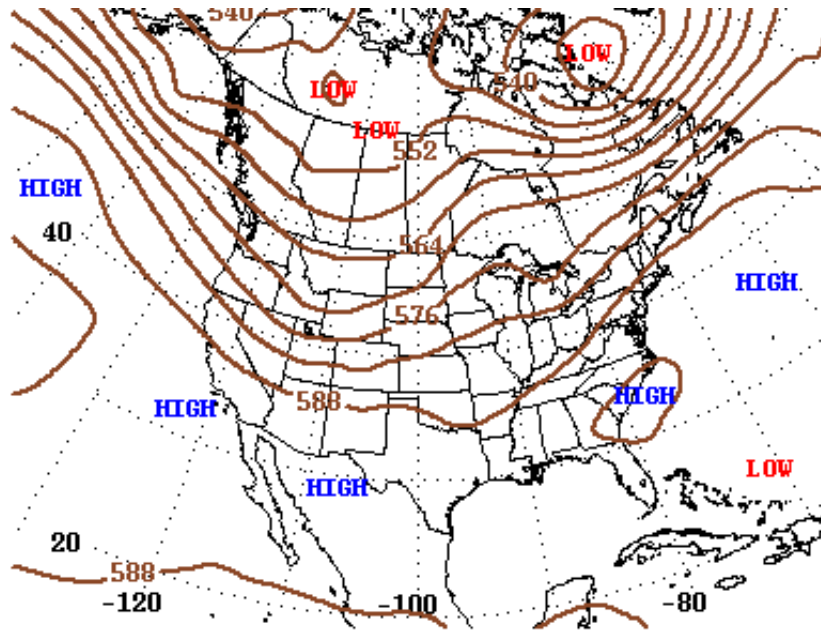


Figure D-14. Surface meteorology map on September 25, 2020.



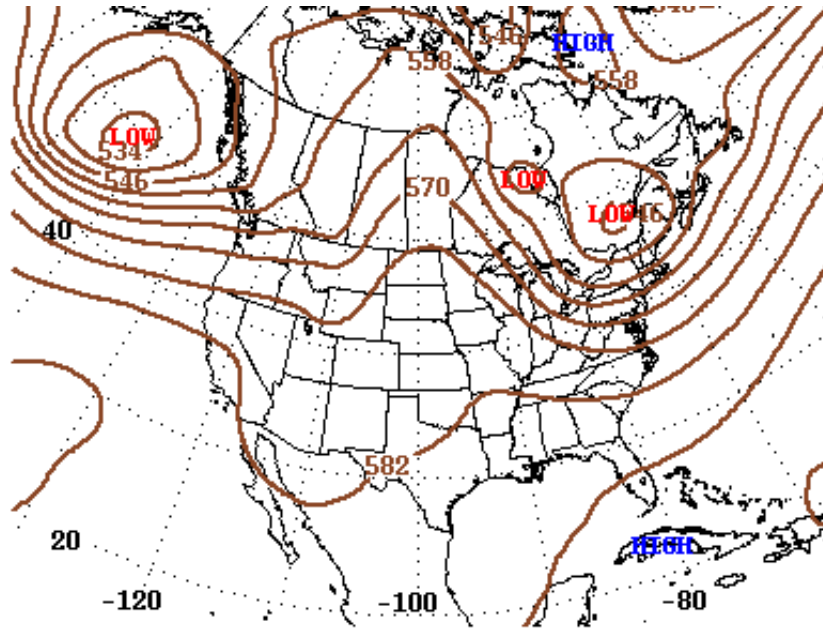
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-15. 500 mb meteorology map on September 26, 2020 (the event date).



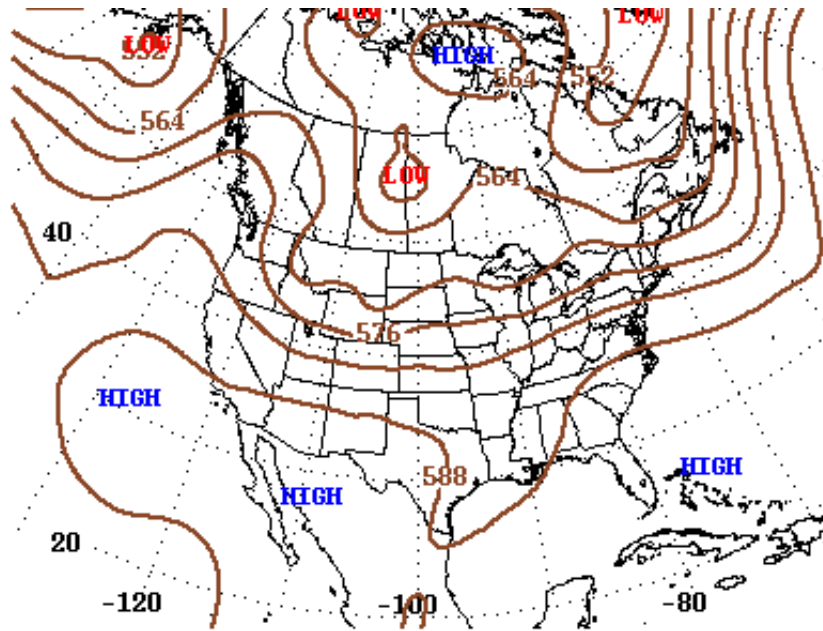
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-16. 500 mb meteorology map on August 31, 2014.



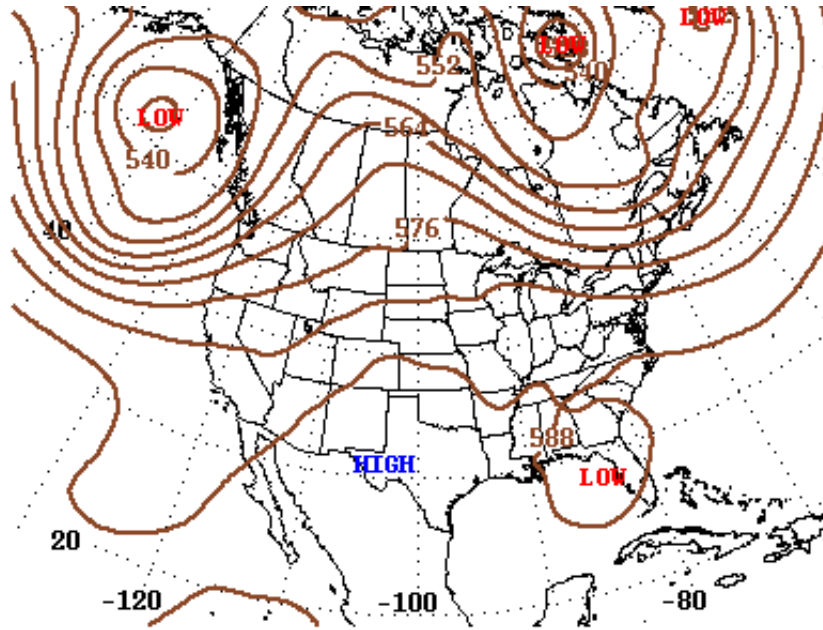
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-17. 500 mb meteorology map on June 2, 2017.



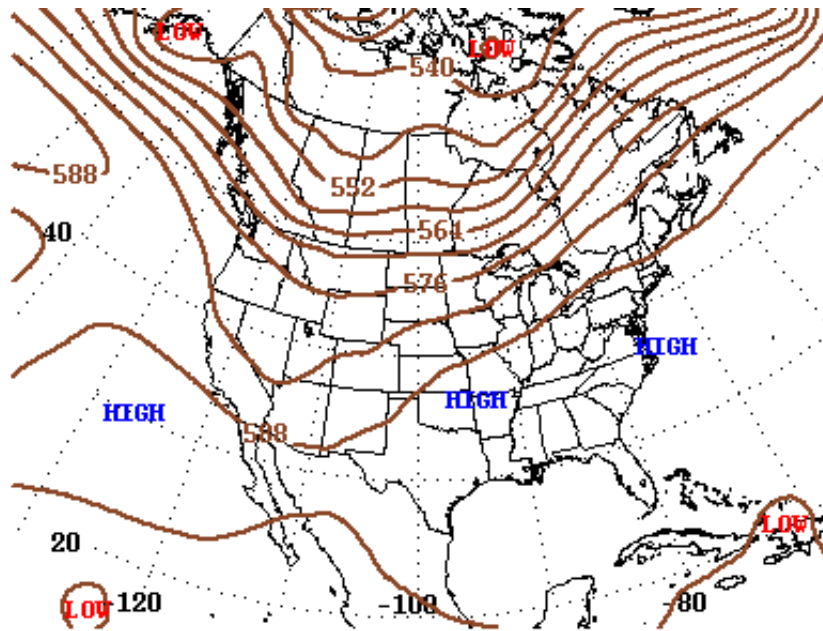
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-18. 500 mb meteorology map on June 29, 2017.



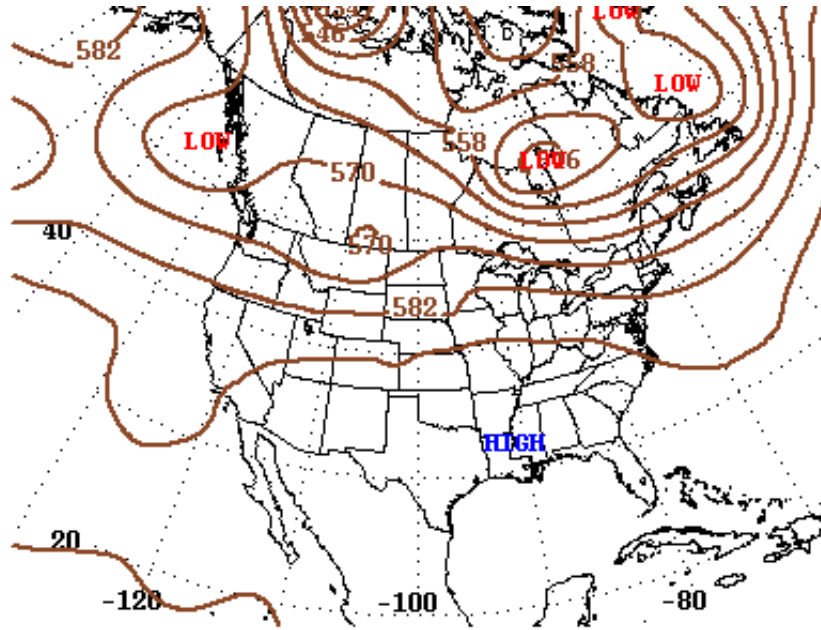
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-19. 500 mb meteorology map on June 8, 2018.



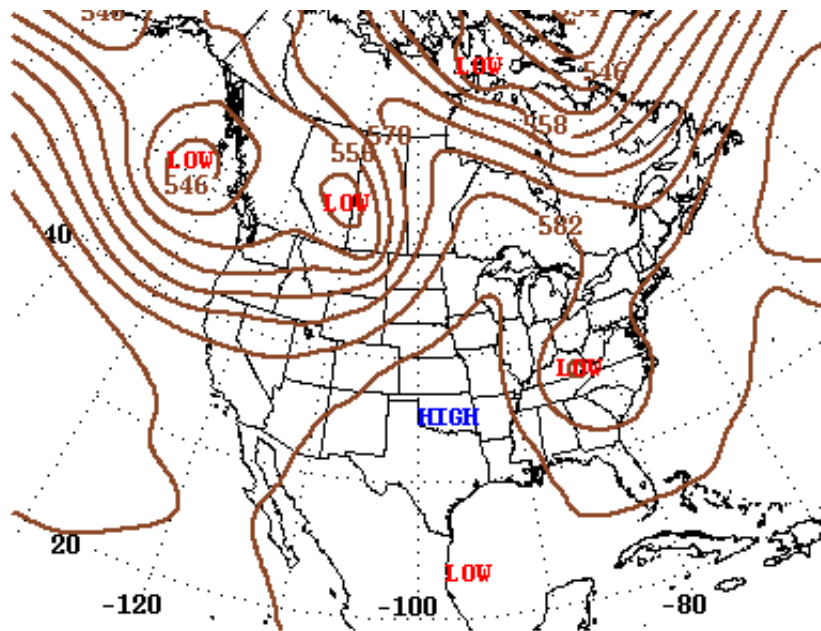
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-20. 500 mb meteorology map on September 1, 2018.



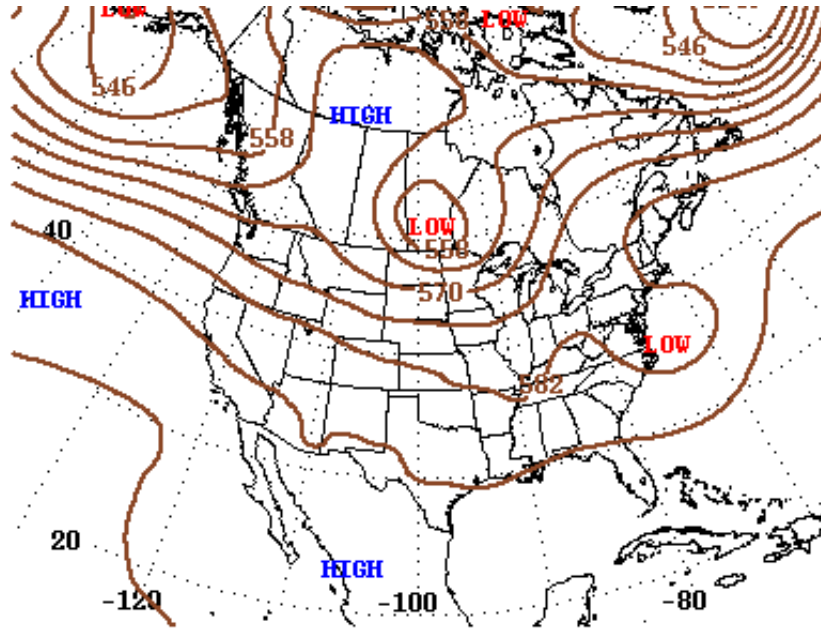
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-21. 500 mb meteorology map on August 12, 2019.



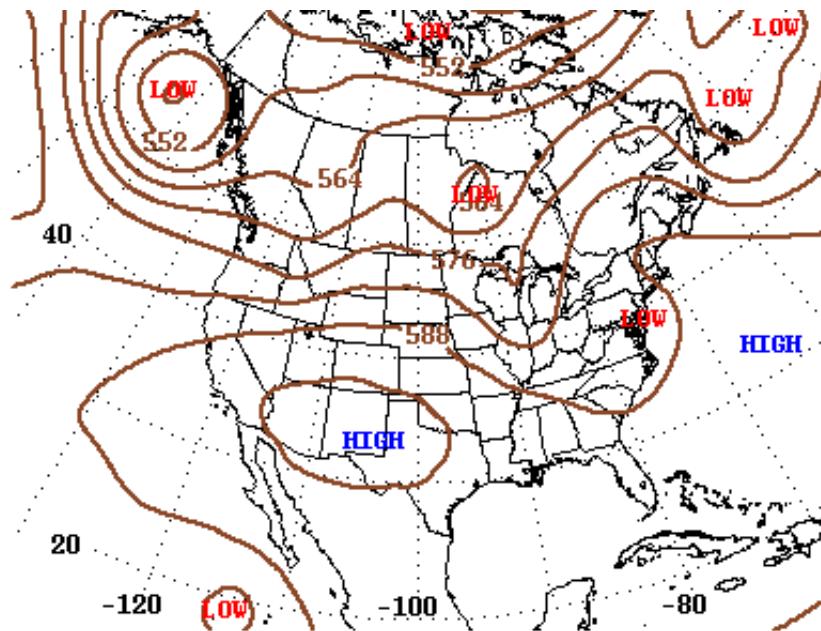
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-22. 500 mb meteorology map on June 15, 2020.



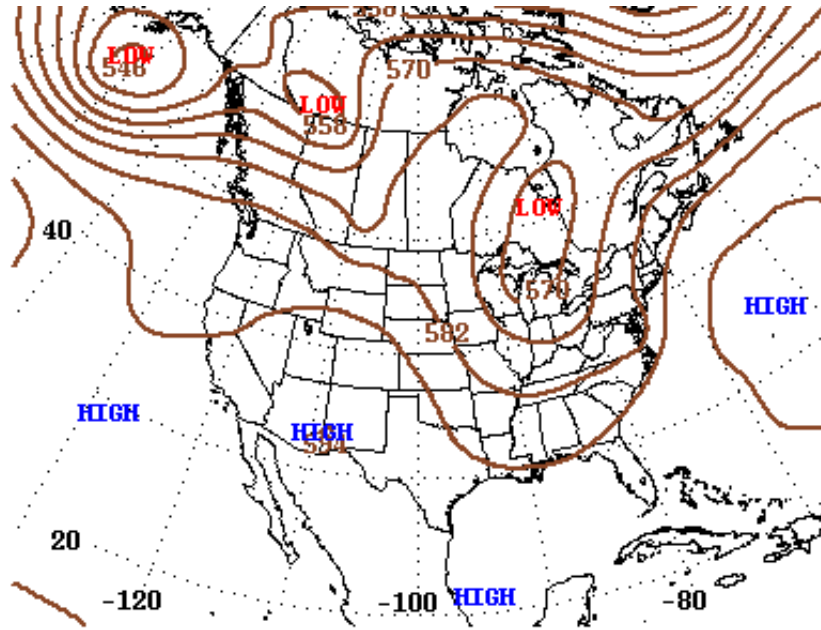
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-23. 500 mb meteorology map on June 21, 2020.



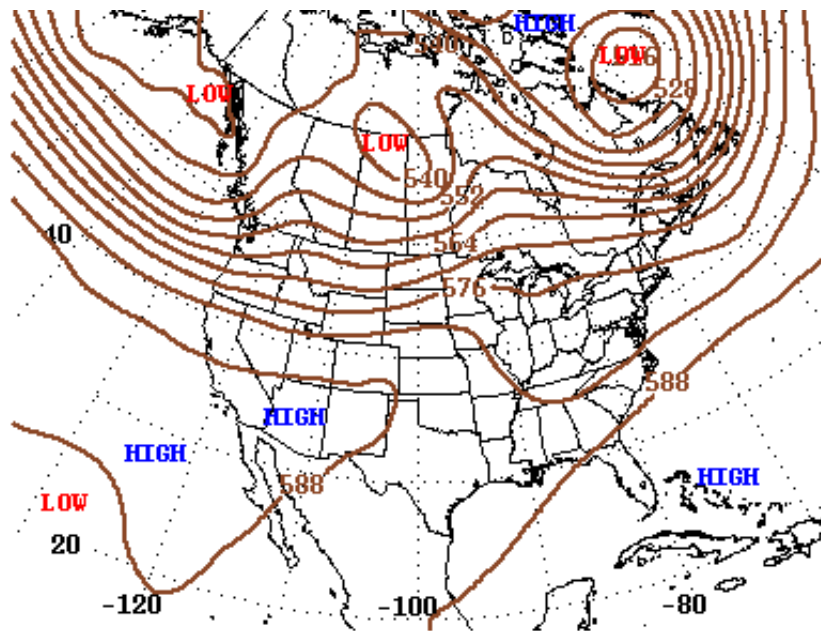
500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-24. 500 mb meteorology map on July 10, 2020.



500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-25. 500 mb meteorology map on August 4, 2020.



500-Millibar Height Contour at 7:00 A.M. E.S.T.

Figure D-26. 500 mb meteorology map on September 25, 2020.

Appendix E. GAM Residual Histograms and Scatter Plots from Concurred Exceptional Event Demonstrations

The following are GAM residual histograms and scatter plots from the concurred Arizona Department of Environmental Quality demonstration (Arizona Department of Environmental Quality 2016) and the submitted Texas Commission on Environmental Quality demonstration (Texas Commission on Environmental Quality 2021) for comparison with our GAM residual analysis. The figures in this Appendix show the good residual results from concurred and currently submitted exceptional events demonstrations to which we compared our results. Based on this comparison, we suggest that our GAM results show a well-fit, unbiased model. A well-fit GAM model should show a normal distribution of residuals at all sites modeled (ADEQ example in [Figure E-1](#)) and show no pattern or bias between GAM residuals and predicted values (TCEQ example in [Figure E-2](#)). These figures compare well with our GAM results in Section 3.3.3 of the main report.

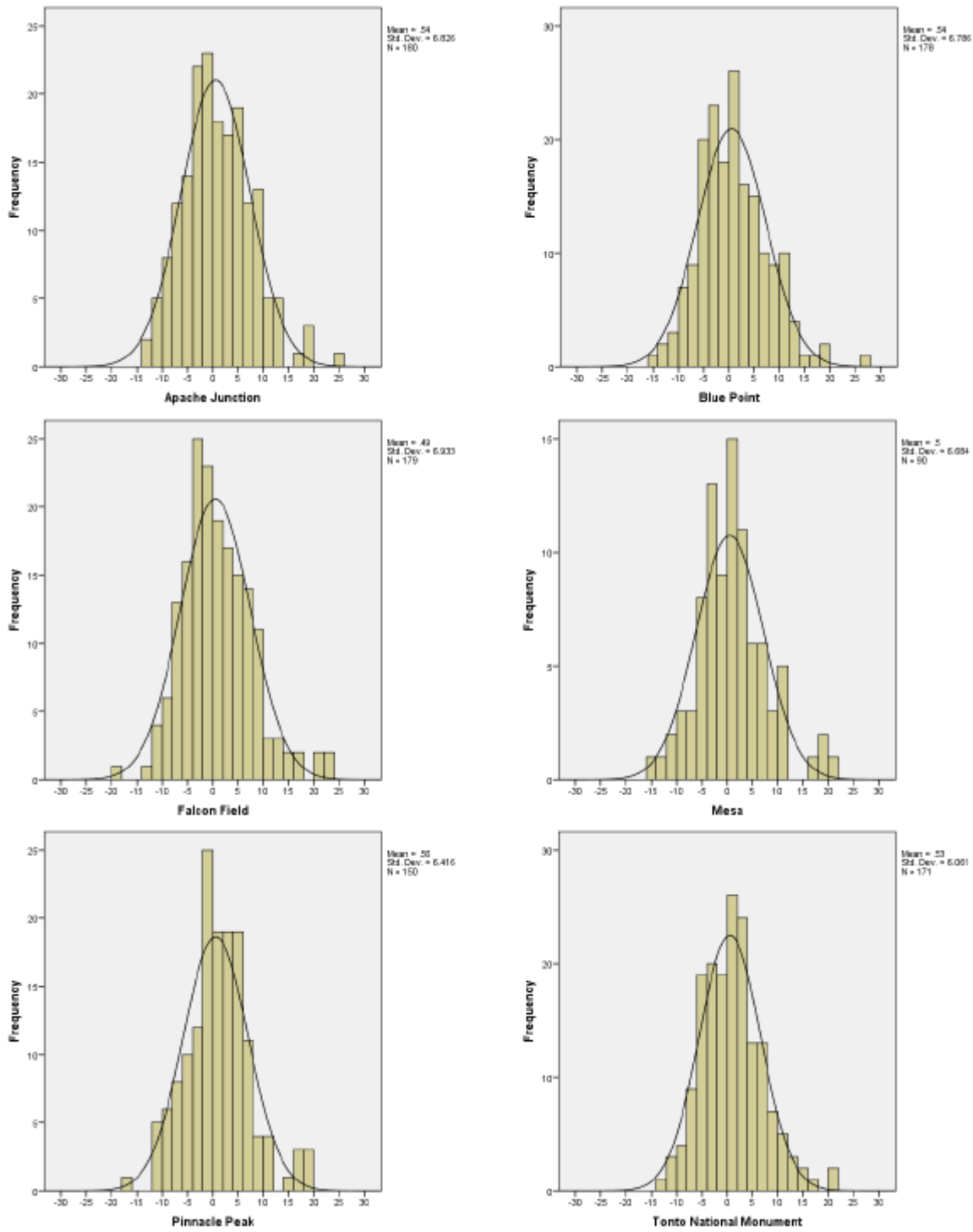


Figure E-1. Histograms of residuals results at each monitoring site from the Arizona DEQ GAM Analysis (Arizona Department of Environmental Quality 2016).

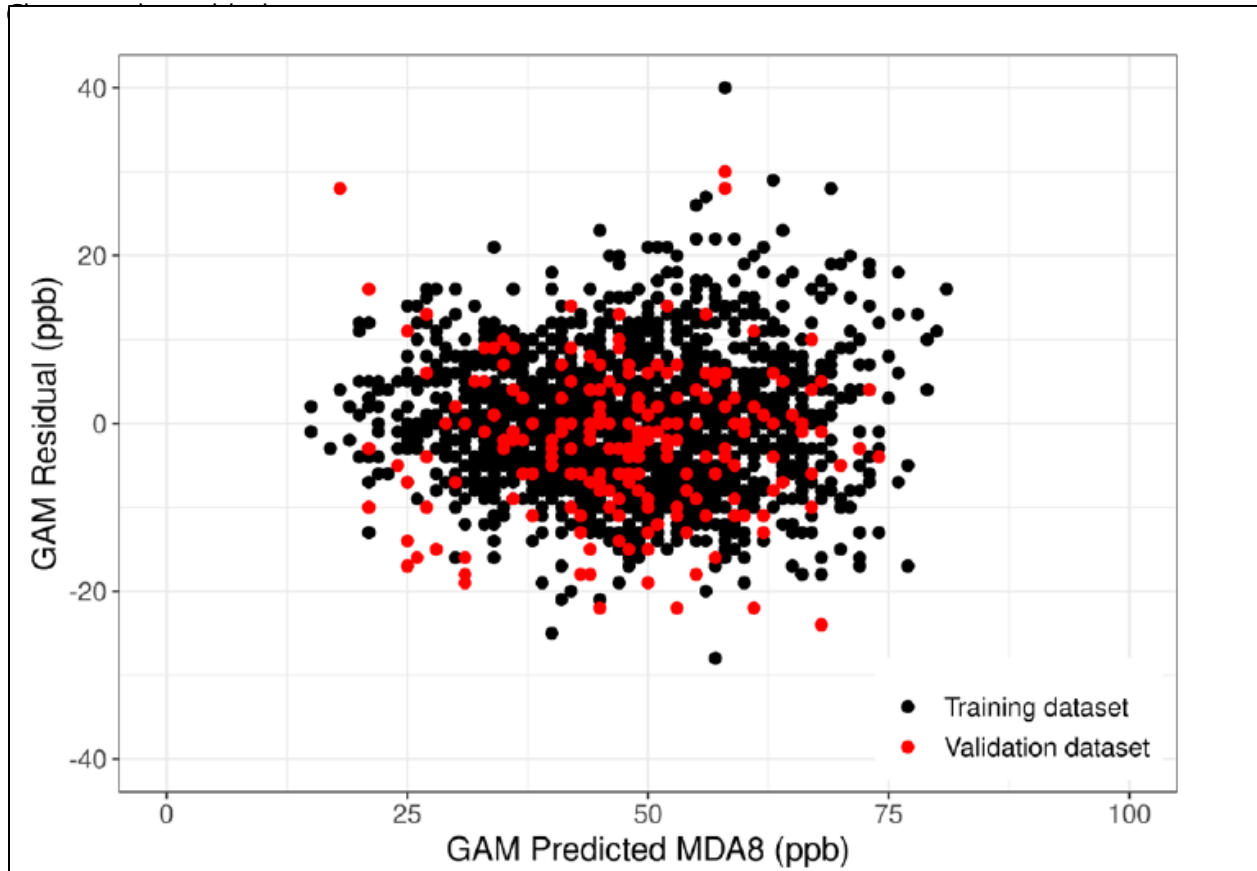


Figure E-2. Scatter plot of GAM residuals (observed – GAM predicted MDA8 ozone) vs. GAM predicted MDA8 ozone from the TCEQ submitted GAM analysis. Training data is shown in black and validation data is shown in red (Texas Commission on Environmental Quality 2021).

References

- Arizona Department of Environmental Quality (2016) State of Arizona exceptional event documentation for wildfire-caused ozone exceedances on June 20, 2015 in the Maricopa nonattainment area. Final report, September. Available at https://static.azdeq.gov/pn/1609_ee_report.pdf.
- Texas Commission on Environmental Quality (2021) Dallas-Fort Worth area exceptional event demonstration for ozone on August 16, 17, and 21, 2020. April. Available at <https://www.tceq.texas.gov/assets/public/airquality/airmod/docs/ozoneExceptionalEvent/2020-DFW-EE-Ozone.pdf>.

Appendix F. Analysis of COVID Restrictions on Ozone

Mobile emission sources decreased throughout the U.S. during the mobility restrictions for the COVID-19 pandemic beginning in mid-March 2020. Because decreases in nitrogen oxides (NO_x) emissions from mobile sources could result in higher ozone concentrations, we evaluated the potential contribution and sensitivity of the COVID-19 shutdown effects on ozone concentrations and MDA8 ozone on exceptional event (EE) days. Ozone production has non-linear dependence on precursor emissions of NO_x and volatile organic compounds (VOCs), as well as meteorological conditions. Changes in precursors also shift photochemical regimes. Thus, the effects of COVID-induced NO_x emission changes on ozone are complex and uncertain (Kroll et al., 2020). Recent studies have found variable ozone responses during lockdowns across countries, with responses ranging from -2 to +10% (Venter et al., 2020). Park et al., 2020 found spatially disparate effects of higher ozone concentrations downwind of Los Angeles and lower concentrations in the western LA basin. To evaluate the potential influence of COVID-19 shutdown precursor emission decreases or increases in MDA8 ozone, we compared ozone concentrations in May 2020 to the historical climatology, and compared the GAM residuals from May 2020 with those for the same historical record.

Based on 2017 emission inventories in Las Vegas, on-road mobile sources comprise 40% of NO_x emissions and total mobile (vehicle + aviation) emissions comprise 88% of total NO_x emissions for typical ozone season weekday (SIP Plan Revision, Clark County 2015). In contrast, only 11% of VOC emissions originate from on-road mobile sources. The effects of decreased mobility due to COVID restrictions has a significant effect on total NO_x emissions, but minimal effect on VOC emissions. To determine the time period for these effects, we compared 2020 daily traffic count data from the Nevada Department of Transportation with that from 2019 across 10 monitoring sites (two examples in [Figure F-1](#)). On-road traffic activity was significantly reduced from mid-March through early-June 2020 in Clark County compared with 2019. Although aviation activity remained lower than pre-pandemic levels for a longer duration of 2020, commercial aviation represents only 12% of NO_x emissions in Clark County. Thus, the reduced aviation activity had a minimal influence on the precursors available for ozone formation from mid-June 2020 onwards. In this section, we focus on May 2020, the first month of 2020 with EE days.

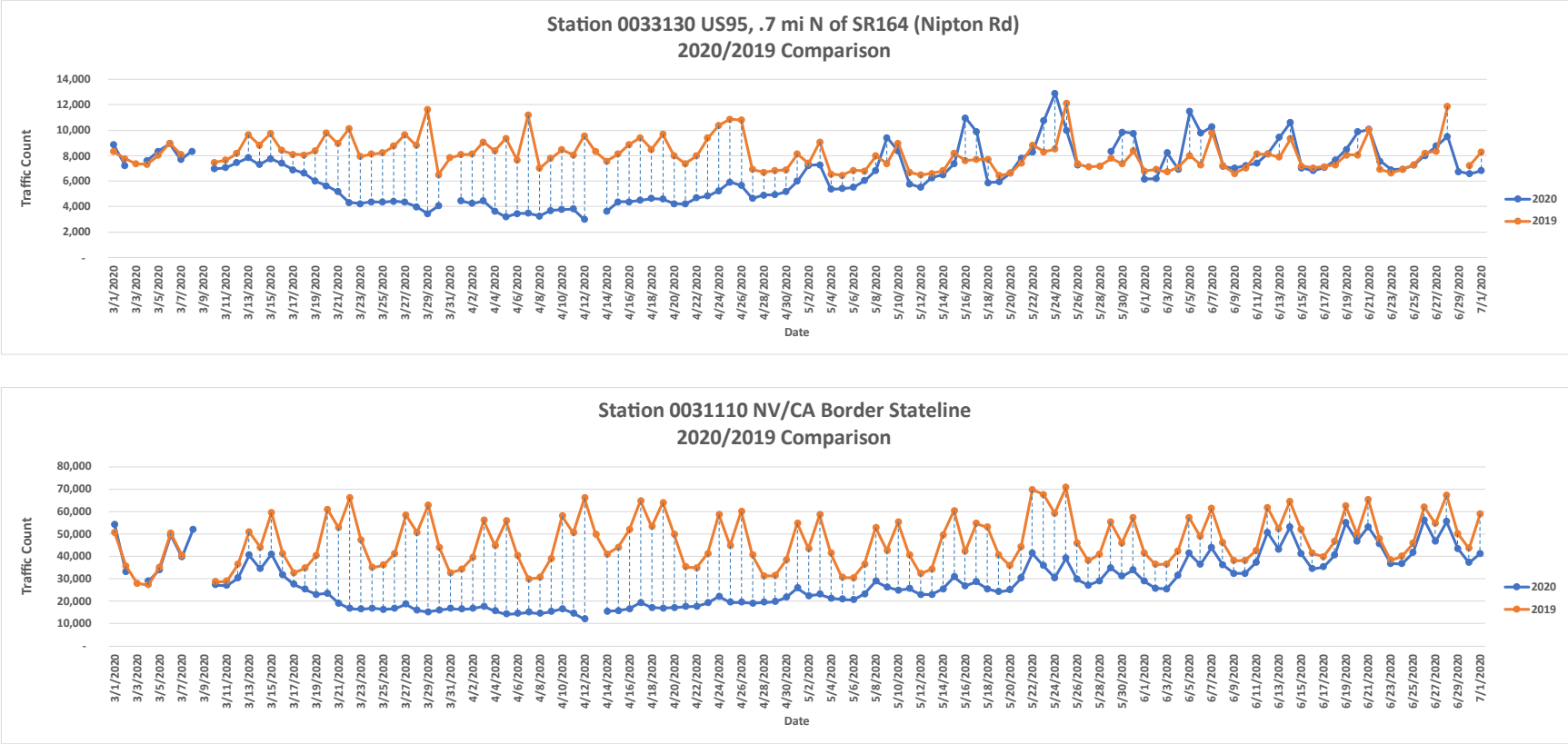


Figure F-1. Time series of 2020 and 2019 traffic counts at two stations: (top) along US95, south of Las Vegas, and (bottom) at the Nevada-California border, west of Las Vegas. Data were provided by the Nevada Department of Transportation.

We performed two sub-analyses for the ozone comparison to historical climatology. First, we compared the distribution of daily MDA8 ozone during May 2020 with those during May in each of the previous 5 years. Across all EE sites, we found median 2020 MDA8 ozone was not statistically different than any of the previous 5 years illustrated by the overlap in the 95th confidence intervals of the monthly medians in previous years with that for 2020 (Figure F-2). Furthermore, monthly median MDA8 ozone during May 2020 was not particularly high (much less than 65 ppb) at all sites despite the exceptional event days. This indicates that the EE day exceedances were extreme episodes that did not affect the monthly median. Thus, the observations do not suggest a month-long high ozone effect due to COVID emission precursor changes. Second, we compared the historical distribution of daily MDA8 ozone during May with the observations during May 2020 (Figure F-3). Across all EE sites, MDA8 ozone on the exceedance days for a given site rank above the confidence interval of the historical daily median MDA8 ozone. Based on these sub-analyses, we conclude that although precursor NO_x emissions decreased during May 2020 due to COVID restrictions, MDA8 ozone concentrations were not statistically higher than previous years. Therefore, the EE days cannot be attributed to a consistent COVID-shutdown influenced month-long increase in ozone concentrations.

To evaluate the GAM model residuals during the COVID shutdown period, Figure 3-50 in Section 3.3.3 provides a more in-depth look at results from April and May 2020, which are the most heavily affected months of the shutdown/COVID restrictions. The 95th confidence interval of the median GAM MDA8 residuals (shown by the notches in the box plots) overlap between 2020 and most other years, except for 2015 and 2016. The May 2020 median residual with EE days (1.5 ppb) is within the typical GAM model uncertainty (+/- [CI from Figure 3-44 from Section 3.3.3). This analysis shows that the median GAM residuals during May 2020 were within the typical GAM model error during the previous 5 years.

In summary, although mobile source precursor emissions of NO_x decreased during April and May 2020 due to COVID shutdown restrictions, we did not observe statistically higher ozone concentrations, nor a higher residual in the GAM model, during May 2020. We find consistent evidence across analyses that the EE day ozone concentrations cannot be attributed to an increase in ozone concentrations associated with COVID shutdown periods.

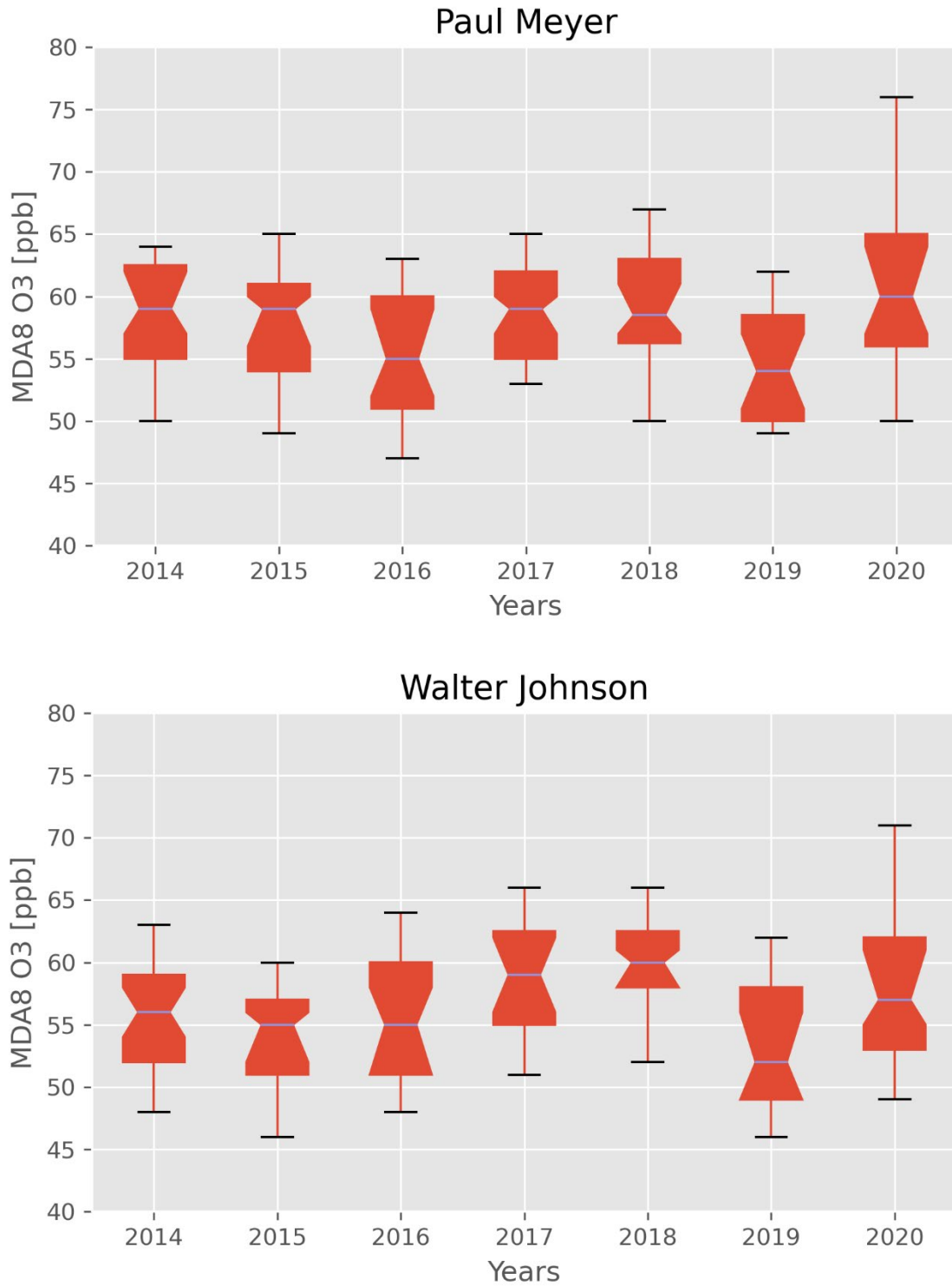


Figure F-2. Annual May distributions of MDA8 ozone at sites with exceptional events during May 2020. Notches denote 95th confidence interval of the median, boxes are 25th, 50th and 75th percentiles, and whiskers are 5th and 95th percentiles.

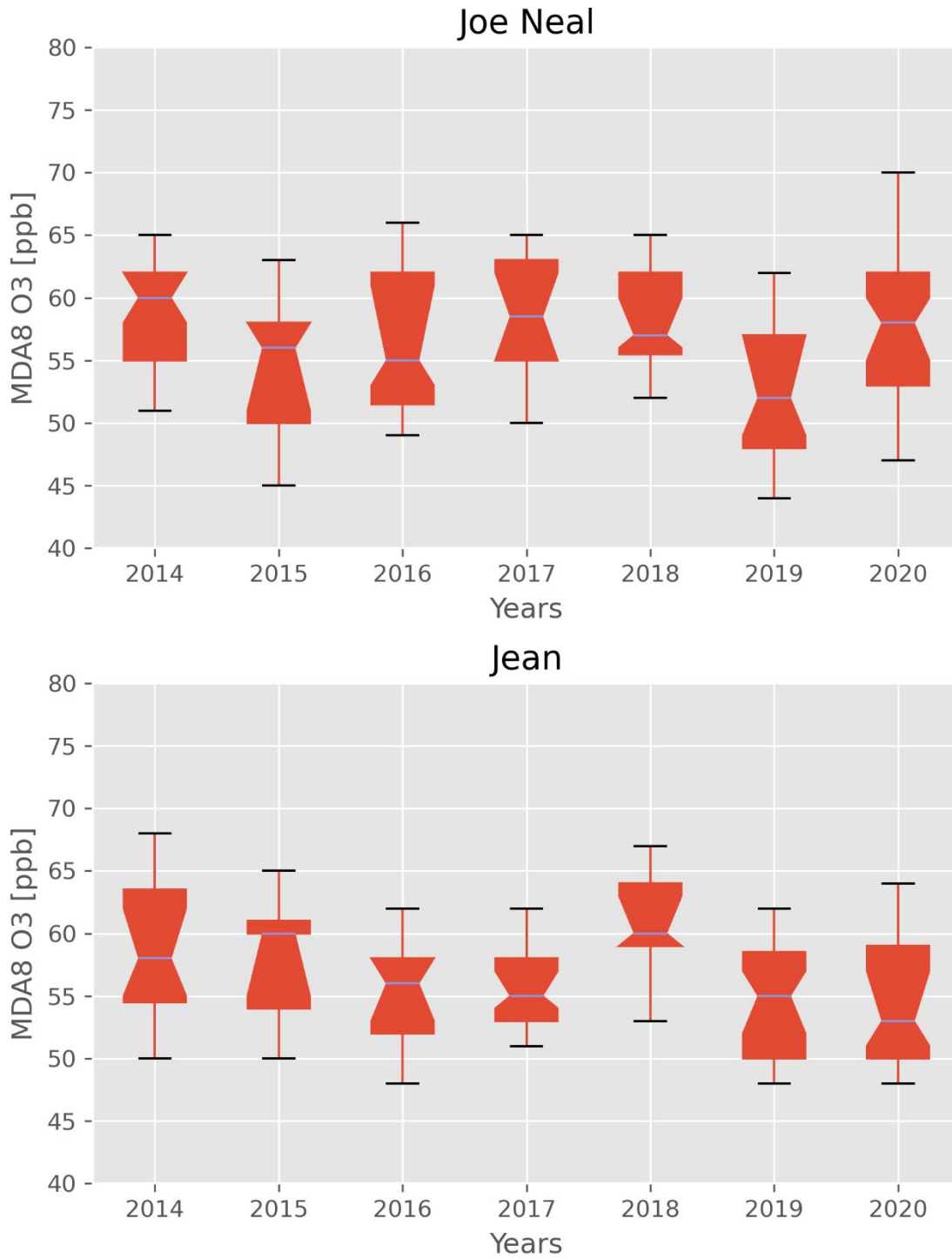


Figure F-2 (Cont.). Annual May distributions of MDA8 ozone at sites with exceptional events during May 2020. Notches denote 95th confidence interval of the median, boxes are 25th, 50th and 75th percentiles, and whiskers are 5th and 95th percentiles.

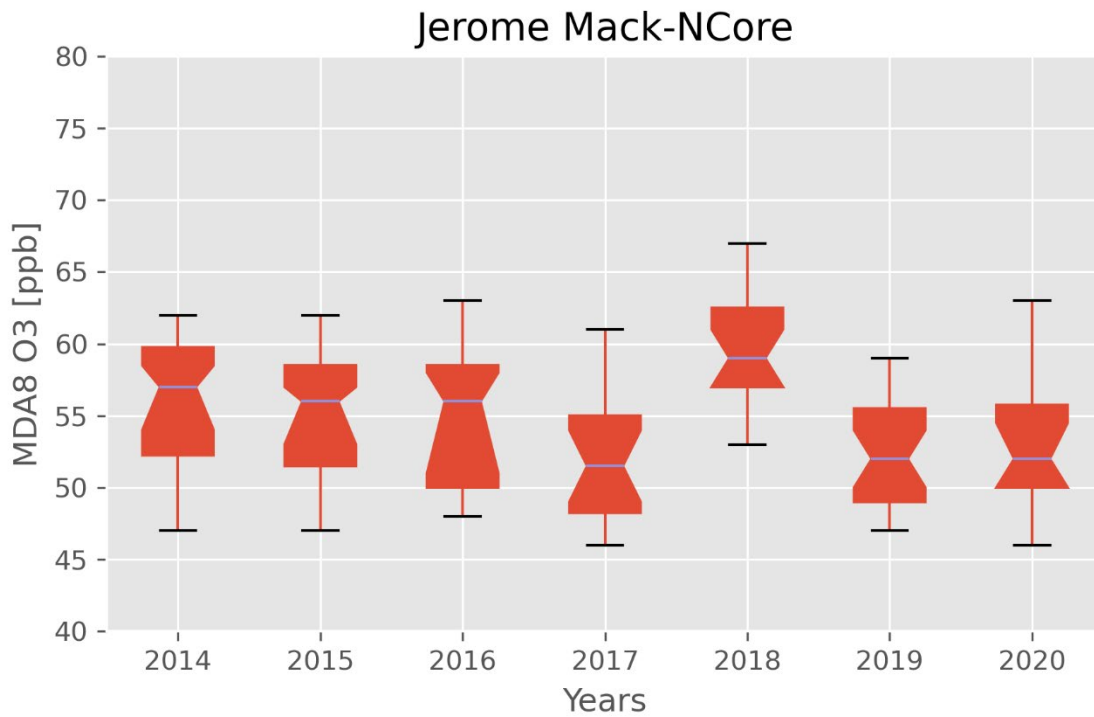
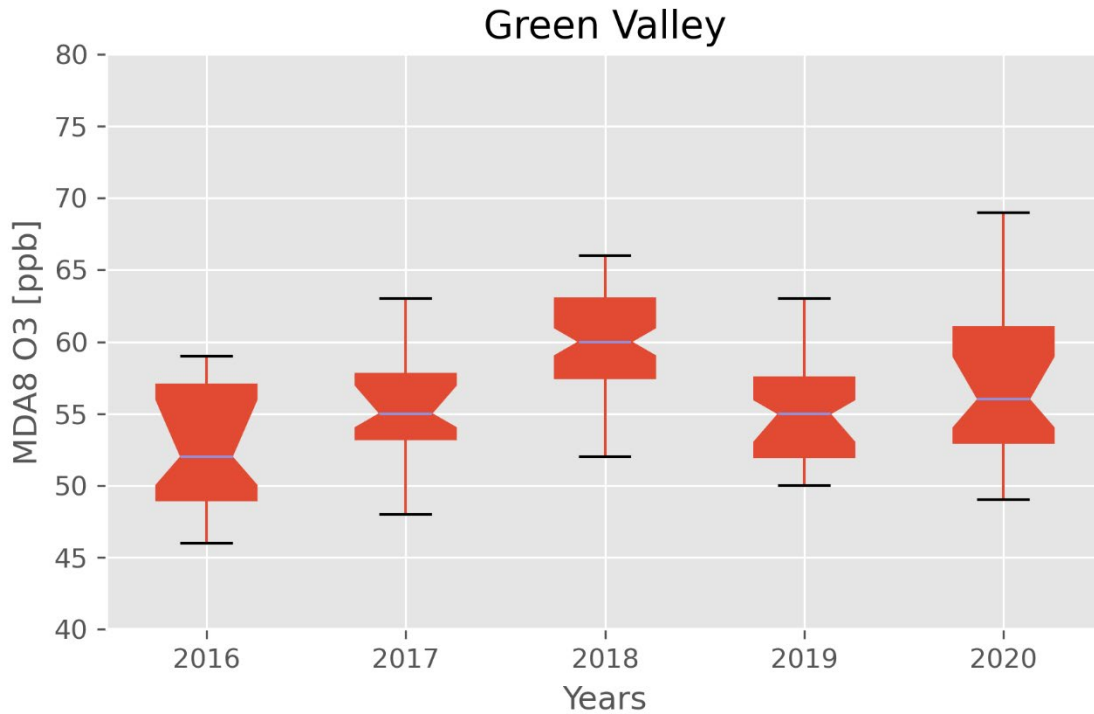


Figure F-2 (Cont.). Annual May distributions of MDA8 ozone at sites with exceptional events during May 2020. Notches denote 95th confidence interval of the median, boxes are 25th, 50th and 75th percentiles, and whiskers are 5th and 95th percentiles.

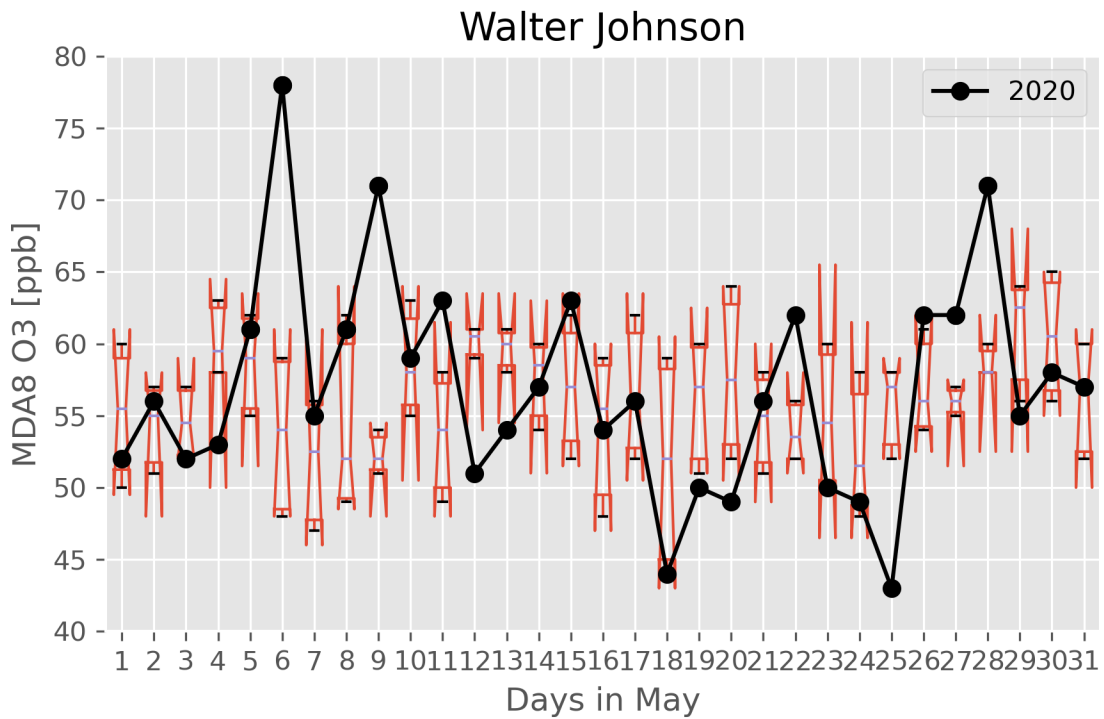
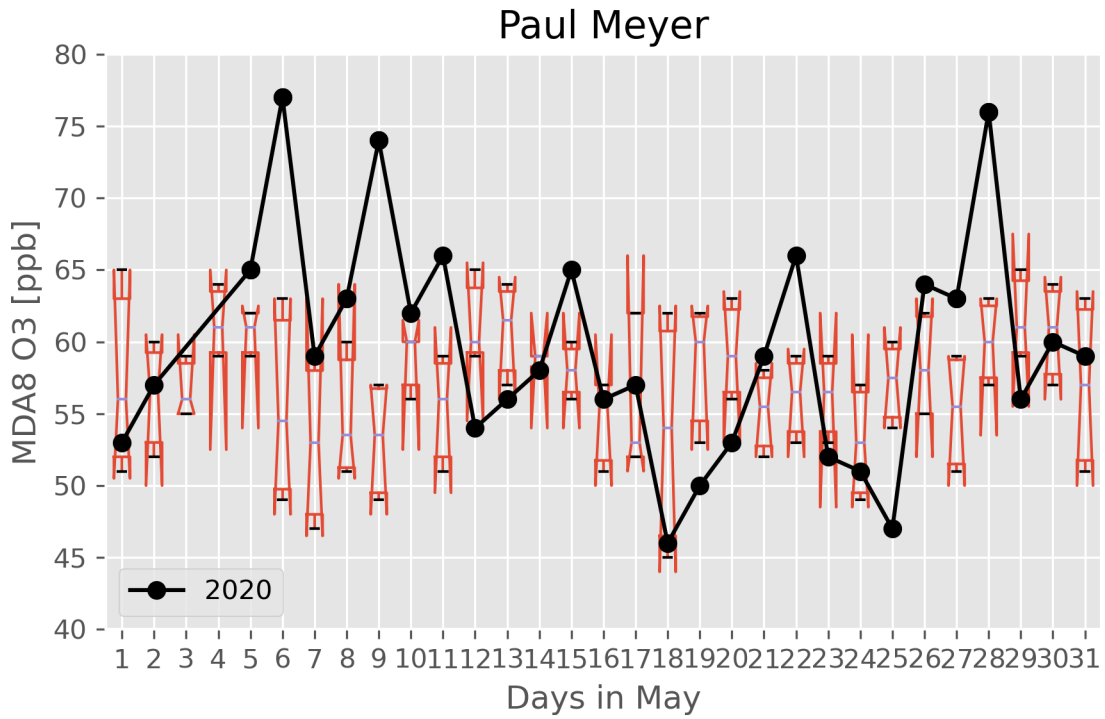


Figure F-3. Daily time series of 2014-2019 MDA8 ozone distributions and 2020 MDA8 ozone at each site with exceptional events during May 2020. Notches denote 95th confidence interval of the median, boxes are 25th, 50th and 75th percentiles, and whiskers are 5th and 95th percentiles.

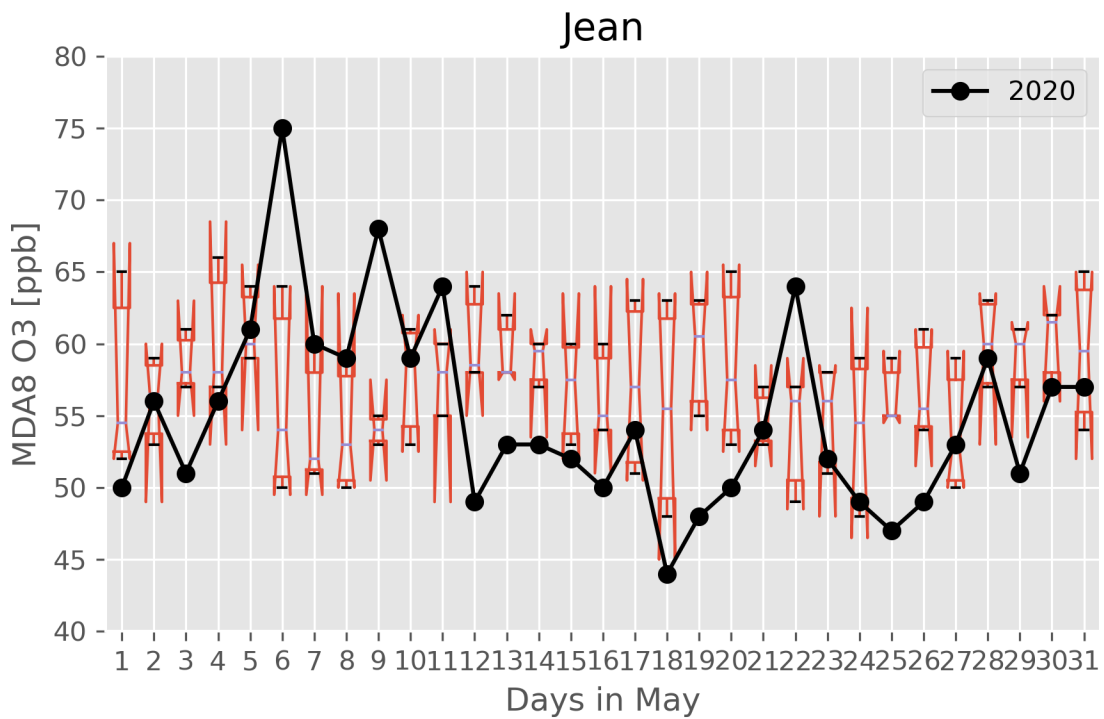
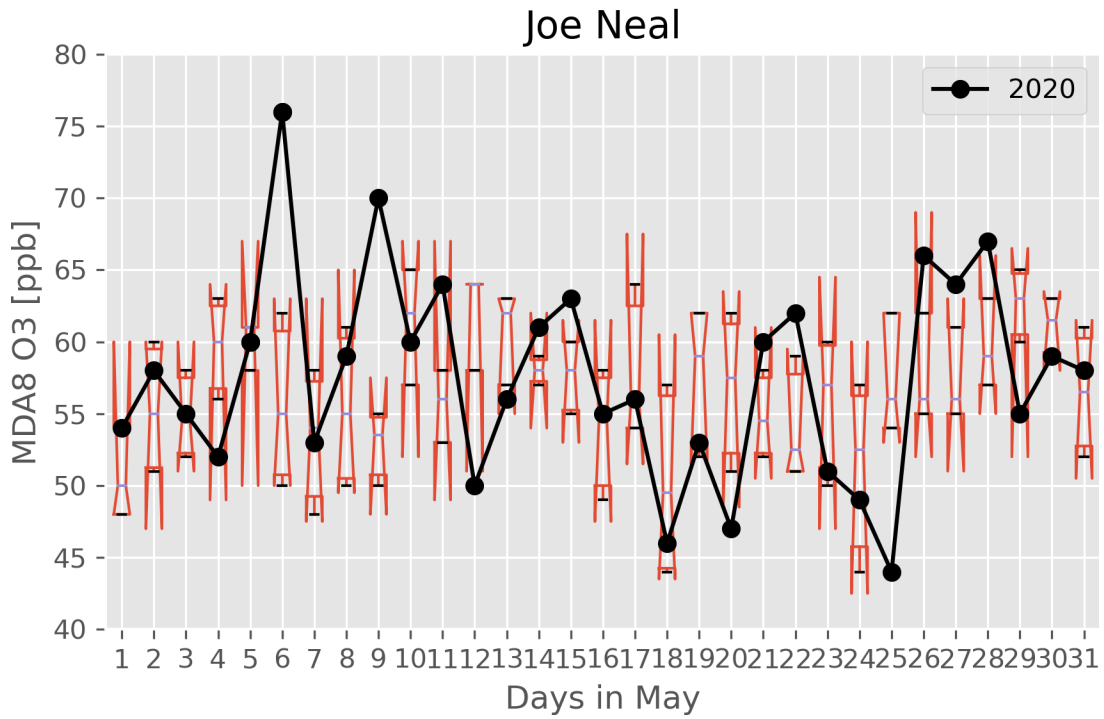


Figure F-3 (Cont.). Daily time series of 2014–2019 MDA8 ozone distributions and 2020 MDA8 ozone at each site with exceptional events during May 2020. Notches denote 95th confidence interval of the median, boxes are 25th, 50th and 75th percentiles, and whiskers are 5th and 95th percentiles.

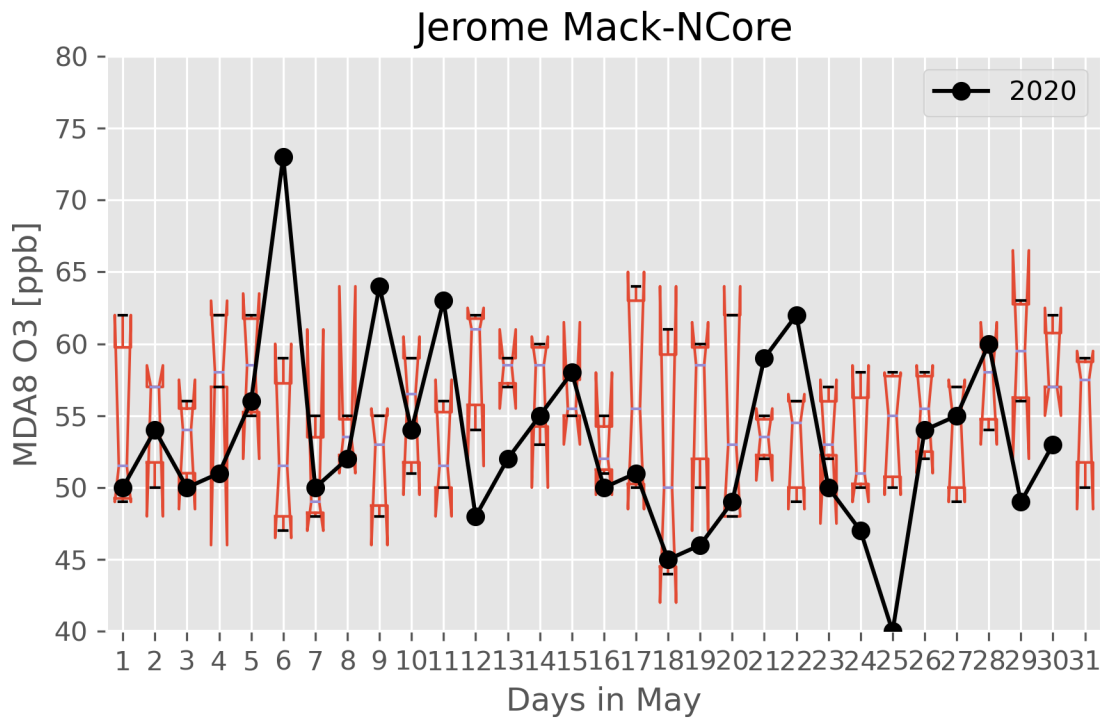
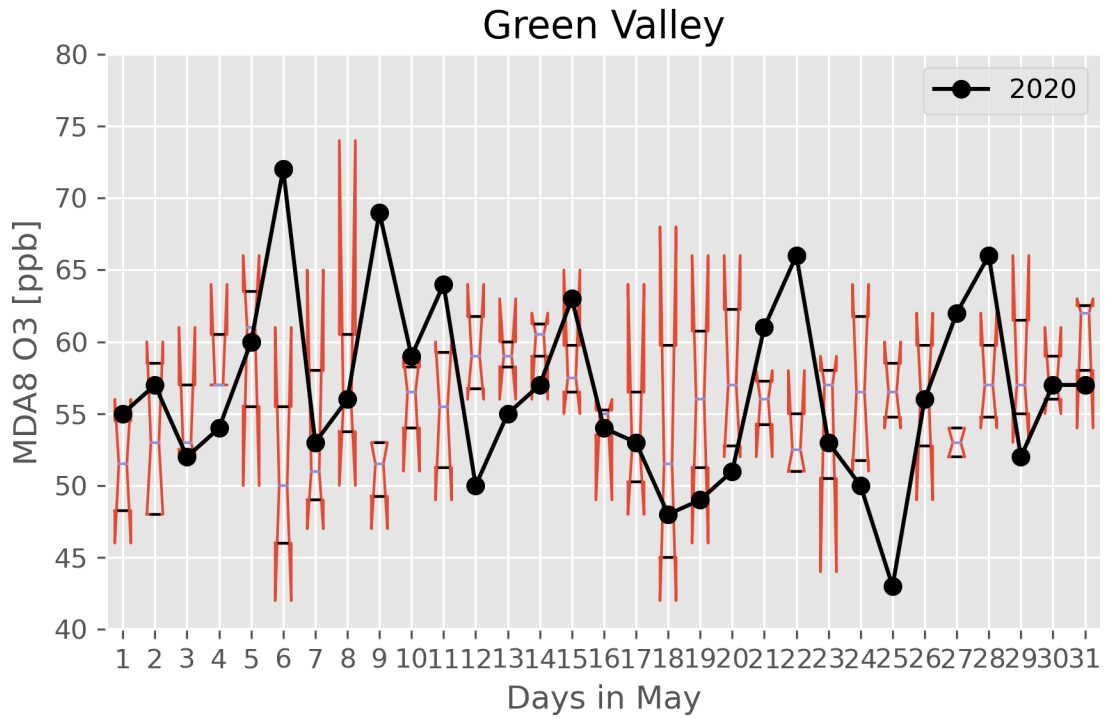


Figure F-3 (Cont.). Daily time series of 2014–2019 MDA8 ozone distributions and 2020 MDA8 ozone at each site with exceptional events during May 2020. Notches denote 95th confidence interval of the median, boxes are 25th, 50th and 75th percentiles, and whiskers are 5th and 95th percentiles.

References

- Clark County Department of Environment and Sustainability (2020) Revision to the Nevada State implementation plan for the 2015 ozone NAAQS: emissions inventory and emissions statement requirements. September. Available at https://files.clarkcountynv.gov/clarknv/Environmental%20Sustainability/SIP%20Related%20Documents/O3/20200901_2015_O3%20EI-ES_SIP_FINAL.pdf?t=1617690564073&t=1617690564073.
- Kroll J.H., Heald C.L., Cappa C.D., Farmer D.K., Fry J.L., Murphy J.G., and Steiner A.L. (2020) The complex chemical effects of COVID-19 shutdowns on air quality. *Nature Chemistry*, 12(9), 777-779, doi: 10.1038/s41557-020-0535-z. Available at <https://doi.org/10.1038/s41557-020-0535-z>.
- Parker H.A., Hasheminassab S., Crouse J.D., Roehl C.M., and Wennberg P.O. (2020) Impacts of traffic reductions associated with COVID-19 on Southern California air quality. *Geophysical Research Letters*, 47(23), e2020GL090164. Available at <https://agupubs.onlinelibrary.wiley.com/doi/abs/10.1029/2020GL090164>.
- Venter Z.S., Aunan K., Chowdhury S., and Lelieveld J. (2020) COVID-19 lockdowns cause global air pollution declines. *Proceedings of the National Academy of Sciences*, 117(32), 18984-18990, doi: 10.1073/pnas.2006853117. Available at <https://www.pnas.org/content/pnas/117/32/18984.full.pdf>.

Appendix G. Documentation of the Public Comment Process

September 26, 2020 Demonstration

Notice of Public Comment

**NOTICE OF PUBLIC COMMENT PERIOD ON
FINAL EXCEPTIONAL EVENT DEMONSTRATIONS**

NOTICE IS HEREBY GIVEN of a public comment period on the final exceptional event demonstrations identified below. The Exceptional Events Rule (EER), codified at 40 CFR 50.1, 50.14, and 51.930, allows air agencies to petition the U.S. Environmental Protection Agency (EPA) to exclude air quality monitoring data influenced by exceptional events from applicable regulatory determinations. Between 2018 and 2020, Clark County recorded several exceedances of the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS) due to impacts from wildfire smoke or stratospheric intrusions. The following table details these exceedances. The Clark County Department of Environment and Sustainability (DES) developed these demonstrations to show that exceedances would not have occurred without wildfire impacts and requests exclusion of event-related data from use in regulatory determinations in accordance with the EER.

NOTICE IS FURTHER GIVEN that a 30-day public comment period will begin on September 3, 2021, and end at 4:00 PM on October 4, 2021, in accordance with the requirements of 40 CFR 50.14(c)(3)(v). The public may review and provide written comments on these demonstrations during this period. Copies of the demonstrations are available for review on the DES website at: https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/public_communications/public_notices.php and may also be obtained by contacting Araceli Pruett at (702) 455-3206.

Any written comments must be received by DES at 4701 W. Russell Road, Suite 200, Las Vegas, Nevada 89118, by 4:00 PM on October 4, 2021. Comments should be addressed to Araceli Pruett at the same mailing address, emailed to araceli.pruett@clarkcountynv.gov, or faxed to (702) 383-9994. All comments will be considered and forwarded to EPA.

Published: September 2, 2021


Marci D. Henson, Director

Final 2018 and 2020 Exceptional Events

Date of Event	Type of Event	Site Name	Exceedance Concentration (ppb)
06/23/2018	Wildfire	Green Valley	75
		Joe Neal	72
		Paul Meyer	72
		Walter Johnson	76
06/27/2018	Wildfire	Green Valley	78
		Joe Neal	72
		Paul Meyer	75
		Walter Johnson	76
07/14/2018	Wildfire	Green Valley	78
		Paul Meyer	72
07/15/2018	Wildfire	Green Valley	73
		Joe Neal	78
		Walter Johnson	71
07/16/2018	Wildfire	Green Valley	71
		Joe Neal	80
		Paul Meyer	75
		Walter Johnson	79
07/17/2018	Wildfire	Paul Meyer	74
		Walter Johnson	77
07/25/2018	Wildfire	Green Valley	72
		Paul Meyer	71
		Walter Johnson	72
07/26/2018	Wildfire	Green Valley	77
		Paul Meyer	72
		Walter Johnson	75
07/27/2018	Wildfire	Joe Neal	76
		Paul Meyer	72
		Walter Johnson	74
07/30/2018	Wildfire	Green Valley	73
07/31/2018	Wildfire	Joe Neal	73
		Walter Johnson	73
08/06/2018	Wildfire	Green Valley	74
		Joe Neal	76
		Paul Meyer	79
		Walter Johnson	77
08/07/2018	Wildfire	Green Valley	72
		Joe Neal	74
		Paul Meyer	73
		Walter Johnson	74

Table continued on next page

Date of Event	Type of Event	Site Name	Exceedance Concentration (ppb)
08/03/2020	Wildfire	Green Valley	72
		Joe Neal	81
		Paul Meyer	78
		Walter Johnson	82
08/07/2020	Wildfire	Joe Neal	72
		Walter Johnson	71
08/18/2020	Wildfire	Joe Neal	78
		Paul Meyer	79
		Walter Johnson	82
08/19/2020	Wildfire	Green Valley	71
		Joe Neal	73
		Paul Meyer	74
		Walter Johnson	74
08/20/2020	Wildfire	Joe Neal	71
08/21/2020	Wildfire	Paul Meyer	71
09/26/2020	Wildfire	Joe Neal	75
		Walter Johnson	71

DES Website Notices

AIR QUALITY PLANNING NOTICES

▼ Thu., September 2, 2021 - Public Notice for Final 2018 and 2020 Exceptional Event Demonstrations

DES welcomes comments on the final exceptional event demonstrations identified in the table below. Under the Exceptional Events Rule (EER), codified at 40 CFR 50.1, 50.14, and 51.930, air agencies are allowed to petition the U.S. Environmental Protection Agency (EPA) to exclude air quality monitoring data influenced by exceptional events from applicable regulatory determinations. Between 2018 and 2020, Clark County recorded several exceedances of the 2015 8-hour ozone National Ambient Air Quality Standard due to impacts from wildfire smoke or stratospheric intrusions. The purpose of these demonstrations is to show that the exceedances would not have occurred without wildfire impacts and request exclusion of event-related data from use in regulatory determinations in accordance with the EER. All comments will be considered and forwarded to EPA.

Public Comment Period:

September 3 through October 4, 2021

Submit comments in writing to:

Araceli Pruet, Senior Planner
 Clark County Department of Environment and Sustainability
 4701 West Russell Road, Suite 200
 Las Vegas, NV 89118
 Phone: 702) 455-3206
 Email: araceli.pruett@clarkcountynv.gov

Review Documents

View [Public Notice](#).

Event Date(s)	Event Type
June 23, 2018 Demonstration Appendices	Wildfire
June 27, 2018 Demonstration Appendices	Wildfire
July 14-17, 2018 Demonstration Appendices	Wildfire
July 25-27, 2018 Demonstration Appendices	Wildfire
July 30-31, 2018 Demonstration Appendices	Wildfire
August 6-7, 2018 Demonstration Appendices	Wildfire
August 3, 2020 Demonstration Appendices	Wildfire
August 7, 2020 Demonstration Appendices	Wildfire
August 18-21, 2020 Demonstration Appendices	Wildfire
September 26, 2020 Demonstration Appendices	Wildfire

Declaration of DES Website Posting

DECLARATION OF WEBSITE POSTING OF PUBLIC NOTICE

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

I, Araceli Pruett, declare that I am over 18 years of age and a Senior Planner with the Clark County Department of Environment and Sustainability (DES). I declare that the *Exceptional Event Demonstration for Ozone Exceedances in Clark County, Nevada – September 26, 2020* was posted on the DES website from September 2 through October 4, 2021. Below is a screenshot of the posting on the DES website at:

https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/public_communications/public_notices.php

AIR QUALITY COMPLIANCE/ENFORCEMENT NOTICES

- > ENFORCEMENT NOTICES

AIR QUALITY PERMITTING NOTICES

- > Source ID: 18121 - Liberty Conoco - Date of Notice: September 15, 2021
- > Source ID: 18120 - 7 Eleven #41270 - Date of Notice: August 25, 2021

AIR QUALITY PLANNING NOTICES

- > Thu., September 2, 2021 - Public Notice for Final 2018 and 2020 Exceptional Event Demonstrations

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in Las Vegas, NV, on October 4, 2021.

Araceli Pruett

Araceli Pruett
DES Senior Planner

DES Facebook Posting



Clark County Department of Environment & Sustainability
September 3 at 2:28 PM · 🌐

#VegasAirQuality Public Participation Notice: Comments are being accepted on 2018 & 2020 Exceptional Event Demonstrations in support of a request to exclude event-related data from use in regulatory determinations. Comment deadline is October 4.
For more: <https://buff.ly/3bS9Gbt>.



👍 Like 💬 Comment ➦ Share

DES Twitter Posting



 **Environment & Sustainability**  @SustainClarkCty · Sep 3 

[#VegasAirQuality](#) Public Participation Notice: Comments are being accepted on 2018 & 2020 Exceptional Event Demonstrations in support of a request to exclude event-related data from use in regulatory determinations. Comment deadline is October 4. For more: buff.ly/3bS9Gbt.



E-Notice

Araceli Pruett

From: Araceli Pruett
Sent: Thursday, September 2, 2021 10:29 AM
Subject: NOTICE OF PUBLIC COMMENT PERIOD ON FINAL EXCEPTIONAL EVENT DEMONSTRATIONS

NOTICE IS HEREBY GIVEN of a public comment period on the final exceptional event demonstrations identified below. The Exceptional Events Rule (EER), codified at 40 CFR 50.1, 50.14, and 51.930, allows air agencies to petition the U.S. Environmental Protection Agency (EPA) to exclude air quality monitoring data influenced by exceptional events from applicable regulatory determinations. Between 2018 and 2020, Clark County recorded several exceedances of the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS) due to impacts from wildfire smoke or stratospheric intrusions. The following table details these exceedances. The Clark County Department of Environment and Sustainability (DES) developed these demonstrations to show that exceedances would not have occurred without wildfire impacts and requests exclusion of event-related data from use in regulatory determinations in accordance with the EER.

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Any written comments must be received by DES at 4701 W. Russell Road, Suite 200, Las Vegas, Nevada 89118, by 4:00 PM on October 4, 2021. Comments should be addressed to Araceli Pruett at the same mailing address, emailed to araceli.pruett@clarkcountynv.gov, or faxed to (702) 383-9994. All comments will be considered and forwarded to EPA.

Published: September 2, 2021

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City of North Las Vegas	Alfredo Melesio
City of North Las Vegas	Johanna Murphy
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Regional Flood Control	Steve Parrish
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Regional Transportation Commission	Craig Raborn
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Southern Nevada Health District	Nicole Bungum
Southern Nevada Off Road Enthusiasts	Ken Thatcher
Southern Nevada Water Authority	Ayoub Ayoub
Southern Nevada Water Authority	Keiba Crear
Southern Nevada Water Authority	Thomas Maher
Southern Nevada Home Builders	Amanda Moss
Southern Nevada Home Builders	Nat Hodgson
The Nature Conservancy	Jaina Moan
University of Nevada Las Vegas	Dave James, PhD.
Washoe County Health District	Francisco Vega
Washoe County Health District	Daniel Inouye

Public Comment Report

Public Notice:	DES Website: September 2 through October 4, 2021
Public Comment Period	September 3 through October 4, 2021
Formal Comments Received:	None
DES Responses:	None