



Department of Finance

Automotive Services

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State of Nevada Dept of Conversation & Natural Resources
State Environmental Commission
901 S. Stewart Street, Suite 4001
Carson City, NV 89701

SUBJECT: Petition for a Variance to NRS/NAC 486A for the County of Clark

The County of Clark is requesting a variance from the Alternative Fuel Program to use regular 87 octane unleaded fuel due to RFG is not readily available in Southern Nevada. This variance is requested for a period of two (2) years.

Clark County has been utilizing RFG from the beginning of the Alternative Fuel Program and has been a strong and vocal supporter of this program. However, it has become increasingly difficult and at times is impossible to get RFG shipped into the State from either Arizona or California. There is currently no storage tanks in Southern Nevada for this type of fuel so what is brought in must be delivered as soon as it arrives which is not always practical. Also, this fuel type is not allowed to be shipped through the two (2) pipelines that currently supply fuel to Southern Nevada. This means the fuel must be trucked in at a higher price which is passed on to the government agencies. This puts a financial burden on the agencies that are required to use this fuel.

Under this program, all GOV Fleets are required to use CA Phase III RFG or AZ Maricopa County RFG. There are currently 1,563 vehicles operating in Clark County on RFG requiring those fleets to expend funds to purchase RFG which must be trucked into the state. This burdens those agencies with an unnecessary cost of doing business to stay in compliance with the state program. In FY14 an additional cost of \$31,237.76 was expended on the use of RFG in the state. This figure does not include the additional charge for transporting the fuel from California.

284,238 Gallons of RFG Used Clark County in FY14
X.1099 Price Diff on CA RFG
\$31,237.76

For the Calendar Year of 2104 there were a total of 1,204,113 registered vehicles in Clark County that match the requirements of this program but do not have to comply, as they are civilian vehicles. There are a total of 1,563 government vehicles in Clark County that fall under NRS/NAC 486A. That equates to the entire government fleet in Southern Nevada making up less than .0012% of these types of vehicles on the road. With such an insignificant number of

government vehicles operating on RFG we have to ask the question, are we really accomplishing the goal of this program to improve the air quality in Southern Nevada?

The Environmental Protection Agency has scheduled the formulation for gasoline to change effective 1 January 2017, nationwide. This change will negate the current language in the NRS/NAC as the new formula is almost exactly the same as the current California Phase III RFG thereby requiring legislation action on this program.

Clark County has been a leader and continues to be a leader in the use of alternative fuel vehicles and fuel in the state of Nevada. We currently have the largest hybrid fleet in the state of Nevada at 505 vehicles to date and we have a fleet of EPA Certified Smart Way vehicles of 83 to date. Further, we were one of the very first agencies in Nevada to incorporate the use of hybrid vehicles in the local law enforcement arena even though this area is exempted from the NRS/NAC. With all of this being said, we respectfully request that a variance be granted for a period of two (2) years.

Respectfully Submitted on Behalf of the County of Clark,



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Attachments: Letter from Department of Air Quality, Clark County
Letter from Thomas Petroleum
Letter from Rebel

CC: Sig Jaunarajs, Nevada Division of Environmental Protection
Joseph Perreira, Nevada Division of Environmental Protection