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*Comment Received From: Monica N Soucier  
Submitted On: 6/9/2026  
Docket Number: 26-TIRE-01*

## **Imperial County Air Pollution Control Comment**

*Additional submitted attachment is included below.*



## AIR POLLUTION CONTROL DISTRICT

June 9, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

SUBJECT: Draft Environmental Impact Report for the Replacement Tire Efficiency Program (Docket #: 26-TIRE-01)

Dear Sirs:

The Imperial County Air Pollution Control District ("Air District") thanks you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Replacement Tire Efficiency Program (RTEP) as well as its appendices, including Appendix A-Initial Study. The RTEP consists of a program and regulations designed to ensure that replacement tires sold in California are, on average, at least as energy efficient as the tires sold as original equipment on passenger cars and light trucks. The RTEP would be applicable to the entire state of California.

The Air District reviewed the RTEP and the Initial Study for consistency and accuracy to our rules and regulations, the California Environmental Quality Act (CEQA), the most current CEQA Air Quality Handbook for Imperial County (Handbook) and the Air District's non-attainment status. Currently, the Air District has approved State Implementation Plans (SIPs) for Ozone, PM<sub>2.5</sub> (24-hr and Annual), and approved Maintenance Plan for PM<sub>10</sub> which are the driving criteria in establishing the thresholds for NO<sub>x</sub>, ROG, PM<sub>10</sub>, SO<sub>x</sub> and CO. These thresholds and their significance are explained within the pages of the Handbook. Section 6 of the CEQA handbook describes the preparation of a thorough Air Quality Analysis. The Air District's comments pertaining to the RTEP and potential impacts to air quality in Imperial County are below.

### Impact on Criteria Pollutants

Imperial County is currently Moderate Nonattainment for the 2012 (annual) PM<sub>2.5</sub> NAAQS and Marginal Nonattainment for the 2015 8-hour Ozone NAAQS. The County monitors NO<sub>x</sub> which is a precursor of ozone. The DEIR estimates the potential annual reduction of criteria air pollutant emissions could reach 426 tons of NO<sub>x</sub> and 10 tons of PM<sub>2.5</sub> by 2035 based on the assumption of a 90 percent compliance rate (page 3-45). The reduction is assumed to be for the entire state. However, it is unclear what inputs were used to arrive at these reduction estimates. A county-specific projection of reductions would be extremely helpful to air districts for modeling emissions inventories for their SIPs. Imperial County requests that the inputs used for this analysis be provided to the Air District in an addendum.

### Regional Enforceability

The RTEP will require tire manufacturers to report minimum performance standards to the California Energy Commission for all replacement tires (new tires) sold or offered for sale in California that are designed to

replace a tire on a passenger car or light-duty truck. An online database will contain the data from tire manufacturers. Certain portions of the database will be publicly accessible to consumers so they can view specific metrics. While the proposed RTEP will be a required statewide program, a good portion of California abuts other states where replacement tires could be readily purchased that might not meet these performance standards. For instance, Imperial County borders Yuma, Arizona to the east, and borders Mexicali, Mexico to the south. California cannot regulate replacement tires purchased in these locations (likely at less cost). What, if any, plans are there to track and maintain an inventory of out-of-state tire purchases? If the intent is to track out-of-state purchases the Air District requests that language be included in the next EIR.

#### Clarification of Significant Impact

CEQA Appendix G (b) evaluates if a project would "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard." The DEIR finds that the RTEP would "not increase air pollutant emissions in any amount that would be cumulatively at considerable levels" (page 3-46). However, Appendix G checklist in Initial Study A-9 contradicts that finding with a "potentially significant impact" finding for cumulatively considerable net increase. The Air District requests clarification on these conflicting findings.

While the Air District does not disagree with the Summary of Conclusions (page 3-4) that implementation of the RTEP is not expected to result in any significant adverse impacts on air quality, it does request that the above comments be addressed in the next EIR.

Air District rules and regulations, forms, and CEQA Handbook can be accessed at <https://apcd.imperialcounty.org> under the Planning drop-down menu. We can be reached at (442) 265-1800.

Sincerely,



Curtis Blondell

APC Environmental Coordinator II

Reviewed by



Monica N. Soucier

APC Division Manager