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<b>Project Title:</b>	Tire Efficiency Order Instituting Information Proceeding
<b>TN #:</b>	259582
<b>Document Title:</b>	San Joaquin Valley Air Pollution Control District (SJVAPCD) CommentLetter for the NOP of a DEIR for the Replacement Tire Efficie
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*Comment Received From: San Joaquin Valley Air Pollution Control District (SJVAPCD)*  
*Submitted On: 10/17/2024*  
*Docket Number: 20-TIRE-01*

**SJVAPCD Comment Letter for the NOP of a DEIR for the Replacement Tire Efficiency Program**

*Additional submitted attachment is included below.*

October 17, 2024

California Energy Commission  
Fuels and Transportation Division  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

**Project: Notice of Preparation of a Draft Environmental Impact Report for the Replacement Tire Efficiency Program**

**District CEQA Reference No: 20241105**

To Whom It May Concern:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the California Energy Commission (CEC) for the Replacement Tire Efficiency Program (RTEP). Per the NOP, the project consists of a program and regulations designed to ensure that replacement tires sold in California are, to the extent feasible, at least as energy efficient as the tires sold as original equipment on passenger cars and light-duty trucks through the establishment of minimum performance standards (Project). The RTEP would be applicable to the entire state of California.

The District offers the following comments at this time regarding the Project:

**1) Project Related Emissions**

At the federal level under the National Ambient Air Quality Standards (NAAQS), the District is designated as extreme nonattainment for the 8-hour ozone standards and serious nonattainment for the particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>) standards. At the state level under California Ambient Air Quality Standards (CAAQS), the District is designated as nonattainment for the 8-hour ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards.

The District understands that the RTEP is a regulation-level project. If there are future development projects, development project construction and operational air emissions should be characterized. The District recommends the air emissions be compared to the District significance thresholds as identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts:  
<https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>.

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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The District recommends that future development projects be mitigated to the extent feasible, and that future projects with air emissions above the aforementioned thresholds be mitigated to below these thresholds.

Environmental reviews of potential impacts on air quality should incorporate the following items:

### **1a) Construction Emissions**

The District recommends for future development projects, to reduce impacts from construction-related diesel exhaust emissions. Future development projects should utilize the cleanest available off-road construction equipment.

### **1b) Operational Emissions**

The District recommends for future development projects, operational (ongoing) air emissions from mobile sources and stationary sources should be analyzed separately. For reference, the District's significance thresholds are identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: <https://ww2.valleyair.org/media/q4nl3p0q/gamaqi.pdf>.

*Recommended Mitigation Measure:* At a minimum, project related impacts on air quality should be reduced to levels below the District's significance thresholds through incorporation of design elements such as the use of cleaner Heavy Heavy-Duty (HHD) trucks and vehicles, measures that reduce Vehicle Miles Traveled (VMTs), and measures that increase energy efficiency. More information on transportation mitigation measures can be found at: <https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf>

### **1c) Recommended Model for Quantifying Air Emissions**

Future development project related criteria pollutant emissions from construction and operational sources should be identified and quantified. Emissions analysis should be performed using the California Emission Estimator Model (CalEEMod), which uses the most recent CARB-approved version of relevant emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: [www.caleemod.com](http://www.caleemod.com).

## **2) District Rules and Regulations**

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual

rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

## **2a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources**

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

Future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, project proponents shall obtain an ATC permit from the District for equipment/activities subject to District permitting requirements.

*Recommended Mitigation Measure:* For projects subject to permitting by the San Joaquin Valley Air Pollution Control District, demonstration of compliance with District Rule 2201 (obtain ATC permit from the District) shall be provided to the CEC before issuance of the first building permit.

For further information or assistance, project proponents may contact the District's SBA Office at (559) 230-5888.

If you have any questions or require further information, please contact Dylan Casares by e-mail at [Dylan.Casares@valleyair.org](mailto:Dylan.Casares@valleyair.org) or by phone at (559) 230-6574.

Sincerely,

Tom Jordan  
Director of Policy and Government Affairs

A handwritten signature in blue ink, appearing to read 'Tom Jordan', with a stylized flourish at the end.

For: Mark Montelongo  
Program Manager