



December 13, 2024

Mr. James Hirsch, Senior Contract Planner
City of Adelanto Community Development Department
Planning Division
11600 Air Expressway
Adelanto, CA 92301

Subject: SCH No. 2024110618 – Tire Recycling Facility (CUP 23-08 & LDP 23-10) –
Draft Initial Study and Mitigated Negative Declaration – San Bernardino
County

Dear Mr. Hirsch:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The City of Adelanto Community Development Department, Planning Division, acting as Lead Agency, has prepared and circulated a draft Initial Study and Mitigated Negative Declaration (IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Tire Recycling Facility (CUP 23-08 & LDP 23-10) (project) is in the southern portion of the City of Adelanto. The project site is located east of the northwest corner of Cactus Road and Beaver Road. The project does not currently have an assigned address. The corresponding Assessor Parcel Number (APN) is 3129-551-05. The total land area of the project is 10 acres or 435,600 square feet. The site is currently vacant and undeveloped. The proposed project would consist of a 158,000 square foot building as a tire recycling facility. Parking would include 264 parking spaces and there will be 8 truck dock high doors located along the building's northwest and northeast corner. Access to the project site would be two driveways: one driveway located southeast of the project site connected with the north side of Cactus Road and another driveway located northwest of the site connected with the east side of Beaver Road. The site's zoning is Manufacturing/Industrial.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

Comments for the Draft IS/MND are summarized below:

Page 3, Project, states "The proposed project would consist of a 158,000 square foot building for use as a tire recycling facility." The project description needs to address the following clarifying questions about the proposed tire recycling facility: 1) Specify what types of tires will be recycled (shredded, split, cut, whole passenger/truck/tractor)?; 2) Will there be any new and/or used tires that will be sold?; 3) Will there be any crumb rubber (as defined in Public Resources Code (PRC) Section [42801.7](#)) produced?; 4) What will be the maximum capacity for storage of used/waste tires for outdoor, indoor and/or trailers?; and 5) Identify what will be the types of processing/types of equipment and the number of each used (shredder, cutter, baler, splitter, etc.)? Please refer to PRC Sections [42806.5](#) and [42807](#) for the definitions of used tire and waste tire, respectively.

Page 7, Section 1.1, Purpose of This Initial Study, states "The total land area of the project is 10 acres or 435,600 square feet...The proposed project would consists of a 158,000 square foot building as a tire recycling facility." Specify what will be the total acreage of the proposed tire recycling facility (including parking and any other area outside of the building used as part of the operations)?

Page 15, Section 2.4, Operational Characteristics of the Proposed Project, states "The hours of on-site operations for the proposed new development will be Monday through Sunday, 8:00 AM to 5:00 PM with 24-hours a day security." Please confirm whether these will also be the proposed days/hours of operation at the tire recycling facility? If not, what will be the days/hours of operation at the tire recycling facility?

Page 21, Section 3.1, Analysis of Environmental Impacts, C., states "All of the tires would be located inside the new building. No outdoor storage would occur." Please confirm that the proposed tire recycling facility will only be storing and processing tires inside the building and no outdoor or trailer storage is proposed?

Page 72, 3.17, Analysis of Environmental Impacts, A., states "The proposed project's total daily trip generation would be 769 vehicle trip ends." Verifying that the maximum daily vehicle trips for the tire recycling facility will be 769 vehicles? If not, what will be the maximum daily vehicle trips for the tire recycling facility?

Solid Waste Regulatory Oversight

CalRecycle is responsible for providing regulatory oversight of waste tire handling activities, including permitting and inspections. Please contact the CalRecycle

Permitting and Assistance Branch contact below to discuss the regulatory requirements for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the Final MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,



Megan Emslander, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Ben Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Jacob Souza, Supervisor
Waste Tire Compliance – South Unit

Edgar Astorga, Environmental Scientist
Waste Tire Compliance – South Unit

Guillermo Morales, Tire Enforcement Agency (TEA)
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