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Dire collateral impact to California residents

PUBLIC COMMENT – California Energy Commission

Docket 26-TIRE-01: Replacement Tire Efficiency Program**

Subject: Request for Specialty Tire Exemption and Revision of Rolling Resistance Requirements
From: California Resident and Vehicle Owner
Date: 6/11/26

1. Summary of Concern

I am submitting this comment to request revisions to the proposed Replacement Tire Efficiency Program. As written, the regulation would effectively prohibit the sale of mud-terrain (MT) and other specialty off-road tires that are commonly used on lifted Jeeps and trucks in California.

For owners of modified vehicles, this is not a simple tire-replacement issue. The proposed rule would impose thousands of dollars in unintended compliance costs by making our current tire sizes unavailable and forcing a return to OEM-compatible configurations that our vehicles are no longer physically set up to use.

This impact is not addressed anywhere in the Initial Statement of Reasons (ISOR) or the economic analysis.

2. My Vehicle Configuration and Why the Rule Creates a Hardship

I currently run 35-inch mud-terrain tires on a Jeep that has been professionally lifted and re-gear to safely accommodate that size. This configuration is common among California off-road users.

If 35-inch MT tires become unavailable due to rolling-resistance thresholds, I cannot simply –buy a more efficient tire. – Returning to OEM-compatible tire sizes would require:

- Replacing the suspension components
- Replacing wheels
- Re-gearing axles

- â€¢ Realigning the vehicle
- â€¢ Potentially replacing driveshafts or correcting driveline angles
- â€¢ Purchasing new fender liners or trimming bodywork

The total cost for this is \$3,000â€“\$8,000, depending on the vehicle. None of this is captured in the CECâ€™s costâ€“benefit analysis.

The ISOR assumes consumers replace tires with the same size they already use. For modified vehicles, this assumption is incorrect and leads to a significant underestimation of economic impact.

3. Mudâ€ˆTerrain Tires Serve a Distinct Purpose Not Captured in the Proposal

Mudâ€ˆterrain tires are not chosen for fuel economy. They are chosen for:

- â€¢ Traction on loose soil, rock, mud, and sand
- â€¢ Sidewall strength for remoteâ€ˆarea travel
- â€¢ Puncture resistance
- â€¢ Safety in offâ€ˆroad environments

These are functional safety characteristics, not aesthetic preferences.

The proposed regulation treats MT tires as if they are interchangeable with OEM highwayâ€ˆterrain or allâ€ˆterrain tires. They are not. They serve a different use case and cannot meet the same rollingâ€ˆresistance targets without compromising the very features that make them safe for offâ€ˆroad use.

4. The Proposal Creates a Deâ€ˆFacto Ban on an Entire Tire Category

Because no Jeep or truck is sold from the factory with mudâ€ˆterrain tires, the OEM baseline for rolling resistance is always lower. Under the current rule language, this means:

- â€¢ MT tires cannot meet the OEM rollingâ€ˆresistance requirement
- â€¢ Therefore, MT tires cannot be sold in California
- â€¢ Therefore, owners of lifted vehicles cannot legally replace their tires

This is a deâ€ˆfacto ban, even if not intended as one.

5. Environmental Impact May Be Worse, Not Better

The ISOR does not evaluate the following:

- MT tires are used fewer miles per year and often swapped seasonally
- MT tires are not typically used for long-distance commuting
- Forcing owners to buy smaller, less durable tires may increase total tire waste
- Forcing reconfiguration of modified vehicles increases manufacturing emissions from replacement parts

A regulation intended to reduce emissions should not inadvertently increase them.

6. Requested Changes

I respectfully request that the CEC adopt one of the following:

Option A – Full Specialty Tire Exemption

Exempt mud-terrain, rock-terrain, and other off-road-specific tires from rolling-resistance requirements, similar to exemptions already used in Europe.

Option B – Partial Exemption With Labeling

Allow sale of MT tires but require clear labeling of rolling-resistance performance so consumers can make informed choices.

Option C – Vehicle-Use-Case Carve-Out

Allow replacement tires that match the vehicle's current configuration, not only its OEM configuration.

Any of these options would preserve consumer choice, avoid unintended economic harm, and still achieve the program's stated goals.

7. Closing

I support efforts to improve efficiency and reduce emissions. However, the current proposal does not account for the real-world diversity of vehicle configurations in California. Without a specialty-tire exemption, the rule will impose disproportionate costs on off-road users, create safety risks, and effectively ban an entire category of tires that serve legitimate and necessary purposes.

I urge the Commission to revise the proposal accordingly.

Thank you for your consideration.