

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	270584
Document Title:	Marco Ventura Comments - Public Comment Opposing the Proposed Replacement Tire Efficiency Regulation (Docket 21-TT-01)
Description:	N/A
Filer:	System
Organization:	Marco Ventura
Submitter Role:	Public
Submission Date:	6/12/2026 8:53:04 AM
Docketed Date:	6/12/2026

*Comment Received From: Marco Ventura
Submitted On: 6/12/2026
Docket Number: 26-TIRE-01*

Public Comment Opposing the Proposed Replacement Tire Efficiency Regulation (Docket 21-TT-01)

Please see attached letter

Additional submitted attachment is included below.

June 10, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Public Comment Opposing the Proposed Replacement Tire Efficiency Regulation (Docket 21-TT-01)

Dear California Energy Commission:

I am writing to express my opposition to the proposed Replacement Tire Efficiency Program. While I support efforts to reduce emissions and improve efficiency, the current proposal creates significant safety risks, reduces consumer choice, and may produce environmental outcomes opposite of those intended. I urge the Commission to reconsider or substantially revise the regulation taking into account the following four issues, before moving forward.

1. Tire Availability and Consumer Choice

The proposed rolling-resistance limits would effectively remove a large portion of the replacement-tire market from California, including many widely used, reputable, and safety-tested models. This includes:

- Performance tires designed for high-grip emergency maneuvers
- Light-truck tires used for towing, hauling, and work applications
- Specialty tires for older vehicles that lack modern OE-equivalent options

California drivers rely on a diverse tire market because driving conditions, vehicle types, and safety needs vary widely. Restricting availability to only low-rolling-resistance designs will force many drivers into sub-optimal or unsafe alternatives that do not match their vehicle's intended performance envelope.

2. Safety Concerns

Rolling resistance is not a standalone metric. It is directly linked to traction, heat tolerance, and tread life. Mandating OE-level rolling resistance for all replacement tires risks:

- Longer stopping distances, especially in emergency braking
- Reduced wet-weather grip, particularly for heavier vehicles
- Increased heat buildup, which can lead to premature failure
- Compromised handling stability, especially for performance-oriented vehicles

Many of the tires likely to be restricted are chosen specifically because they provide superior grip and predictable handling, which are critical for accident avoidance. A regulation that unintentionally reduces traction will increase crash risk and undermine public safety.

3. Environmental Trade-offs

The proposal assumes that lower rolling resistance always produces a net environmental benefit. In practice, the opposite may occur.

Shorter tread life increases waste.

Low-rolling-resistance compounds often wear out significantly faster. If drivers must replace tires more frequently, California will see:

- More scrap-tire waste

- More manufacturing emissions
- More transportation emissions from distribution

Any fuel-savings benefit can be quickly erased by the environmental cost of producing and disposing of additional tires.

Forcing drivers into mismatched tires reduces efficiency.

A tire that is not appropriate for a vehicle's weight, suspension geometry, or intended use can actually reduce real-world efficiency, not improve it. Drivers may also resort to out-of-state purchases, increasing emissions from shipping and travel.

4. Economic Impact on Consumers

The proposal may increase costs for California drivers by:

- Eliminating competitively priced mid-market tires
- Forcing consumers into premium OE-style tires with shorter lifespans
- Increasing replacement frequency due to faster wear

The CEC's cost-savings projections do not account for these real-world factors. I respectfully request that the Commission:

- Reevaluate the rolling-resistance thresholds to avoid eliminating safe, widely used tires
- Expand exemptions for performance, light-truck, and specialty applications
- Incorporate tread-life impacts into the environmental analysis
- Conduct real-world safety testing rather than relying solely on laboratory metrics
- Delay implementation until a broader range of compliant tires exists

California can pursue efficiency goals without compromising safety, consumer choice, or environmental integrity. The current proposal does not achieve that balance.

Thank you for considering this comment.

Marco G Ventura