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Choice

I am writing to express my concerns regarding the California Energy Commission's proposed tire replacement efficiency program. While I appreciate the state's efforts to improve fuel efficiency and reduce emissions, I believe the proposal may unintentionally limit consumer choice and fail to account for legitimate safety and performance needs.

My primary concern is that the program appears to prioritize fuel efficiency above all other considerations, potentially discouraging the use of tires that provide important safety benefits. I would encourage policymakers to consider real-world examples demonstrating why flexibility is necessary.

For example, I drive a hybrid vehicle that was not originally equipped with run-flat tires and does not have the ability to carry a spare tire. I have chosen to install run-flat tires, even though they reduce my fuel economy by approximately 2.3%, lowering it from about 43 miles per gallon to 42 miles per gallon. This modest reduction in efficiency is a worthwhile tradeoff because it allows me to continue driving safely after a puncture.

This capability is particularly important when I visit family in Mendocino County. Much of the county is rural, with limited services and areas that lack cellular phone coverage. In these circumstances, the ability to continue driving after a flat tire is not merely a convenience—it is an important safety feature.

Similarly, I regularly travel to Lake Tahoe during the winter months. Safe winter travel often requires snow tires or Three-Peak Mountain Snowflake (3PMSF) rated tires. These specialty tires may be slightly less fuel-efficient (again 2-5%) than the original equipment tires supplied by the manufacturer, but they provide significantly improved traction and safety in snow and ice conditions.

For example, my 2022 Toyota Highlander Hybrid was originally equipped with manufacturer-specific Bridgestone tires that delivered approximately 36 miles per gallon. After replacing those tires with Michelin CrossClimate2 tires, my fuel economy decreased slightly to approximately 35 miles per gallon—a reduction of only about 2.8%.

In exchange for this modest decrease in efficiency, I gained substantial improvements in safety and vehicle capability. The Michelin CrossClimate2 tires carry the Three-Peak Mountain Snowflake rating and provide significantly better performance in snow and ice. This improvement extends beyond shorter stopping distances; it includes superior cornering, steering response, and overall vehicle control in adverse weather conditions. For drivers who regularly travel to mountain regions such as Lake Tahoe during the winter, these characteristics can make a meaningful difference in vehicle safety.

This example illustrates why Californians should retain the freedom to choose tires that best meet their driving needs. A narrowly focused efficiency standard could discourage the use of tires that provide substantial safety benefits in exchange for only a very small reduction in fuel economy.

I respectfully ask that any tire efficiency program preserve consumer choice and include reasonable exemptions or accommodations for specialty tires, including run-flat tires, winter tires, and Three-Peak Mountain Snowflake rated all-weather tires. Californians should not be forced to choose between compliance with an efficiency standard and maintaining the safety capabilities needed for their particular driving conditions.

I support efforts to improve energy efficiency, but those efforts should be balanced with practical considerations of safety, geography, and individual transportation needs.

Thank you for your service and for considering my concerns.

Sincerely,

Paul Belusko