

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	270635
Document Title:	Beth Hammon Comments - NRDC Tire Efficiency Rulemaking Comments
Description:	N/A
Filer:	System
Organization:	Beth Hammon
Submitter Role:	Public
Submission Date:	6/16/2026 3:13:17 PM
Docketed Date:	6/16/2026

*Comment Received From: Beth Hammon
Submitted On: 6/16/2026
Docket Number: 26-TIRE-01*

NRDC Tire Efficiency Rulemaking Comments

Additional submitted attachment is included below.



June 16, 2026

California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

RE: Docket No. 26-TIRE-01 – Replacement Tire Efficiency Program

Dear Commissioners:

The Natural Resources Defense Council (NRDC) appreciates the opportunity to comment on the California Energy Commission's (CEC) proposed Replacement Tire Efficiency Program.

The Commission has developed a thoughtful, evidence-based proposal that will reduce transportation costs, lower greenhouse gas emissions, improve air quality, and provide consumers with better information when purchasing replacement tires. We commend the Commission and staff for the extensive technical analysis, stakeholder engagement, and careful consideration that has informed this rulemaking. The proposal is the product of years of technical analysis and stakeholder engagement undertaken pursuant to the statutory direction to develop a replacement tire efficiency program.

Transportation Efficiency Is a Core Component of California's Climate Strategy

California has made significant investments in vehicle electrification, charging infrastructure, and clean transportation programs. At the same time, improving vehicle efficiency remains one of the most cost-effective ways to reduce transportation emissions, lower energy consumption, and minimize costs for drivers.

One of the strengths of the proposed rule is that it delivers benefits regardless of vehicle technology. More efficient replacement tires reduce energy consumption for gasoline vehicles, hybrid vehicles, and electric vehicles alike. As a result, the proposal delivers immediate emissions reductions from today's fleet while also supporting California's transition to zero-emission transportation.

The Commission's analysis demonstrates the magnitude of these benefits. By 2035, the proposed standards are expected to reduce greenhouse gas emissions by approximately 2 million metric tons annually – equivalent to removing roughly 400,000 passenger vehicles from California roads. The proposed standards are also expected to reduce gasoline consumption by more than 140 million gallons annually while reducing electricity consumption from electric vehicles by approximately 0.9 terawatt-hours per year. These reductions illustrate the important role that efficiency improvements can play alongside vehicle electrification in achieving California's climate goals.

Reducing transportation energy demand can also help maximize the benefits of electrification. As California prepares for continued growth in electric vehicle adoption, improving vehicle efficiency can reduce charging demand, lower system costs, and ease pressure on the electric grid. As California continues to invest in transportation electrification, improving vehicle efficiency remains one of the most cost-effective tools available for reducing energy consumption, lowering emissions, and delivering benefits to drivers.

The Proposed Rule Advances Affordability, Equity, and Public Health

Transportation remains one of the largest household expenses for many Californians, and fuel costs can be particularly burdensome for lower-income households. By reducing the amount of fuel and electricity required to travel the same distance, the proposed standards will generate savings that accrue over the life of a vehicle and across California's broader transportation system.

These benefits are particularly important from an equity perspective. The Commission's analysis notes that lower-income households spend a larger share of their income on transportation than higher-income households. Policies that reduce ongoing transportation costs can therefore provide disproportionate benefits to households that face the greatest affordability challenges.

The proposal will also reduce pollution associated with transportation energy use. In addition to reducing greenhouse gas emissions, lower fuel consumption will reduce emissions of pollutants that contribute to poor air quality and adverse health outcomes. These benefits are especially important for communities that continue to experience disproportionate exposure to transportation-related pollution, including communities located near major roadways, freight corridors, and other transportation infrastructure.

Too often, transportation policy discussions frame affordability, public health, and climate action as competing priorities. The proposed Replacement Tire Efficiency Program demonstrates that well-designed efficiency policies can advance all three simultaneously.

Consumer Information and Market Transparency Are Important Program Benefits

Consumers can readily compare fuel economy when purchasing a vehicle, but they generally lack access to comparable information when purchasing replacement tires. Yet tire efficiency directly affects vehicle operating costs, energy consumption, and emissions.

The proposed rating system and public database will provide Californians with transparent, accessible information regarding tire efficiency and help consumers make more informed purchasing decisions. Improved transparency can also encourage continued innovation and competition among manufacturers, ensuring that consumers benefit from ongoing improvements in tire technology.

The proposed Replacement Tire Efficiency Program represents a practical, cost-effective policy that advances California's climate, affordability, consumer protection, and public health objectives. By reducing transportation energy consumption across both conventional and electric vehicles, the proposed standards will deliver meaningful benefits for drivers while supporting

California's broader climate and clean transportation goals. NRDC respectfully urges the Commission to move forward with adoption of the proposed standards.

Sincerely,

A handwritten signature in black ink that reads "Beth Hammon". The signature is written in a cursive, slightly slanted style.

Beth Hammon
Senior Advocate
Natural Resources Defense Council