

| <b>DOCKETED</b>         |                                             |
|-------------------------|---------------------------------------------|
| <b>Docket Number:</b>   | 24-TIRE-01                                  |
| <b>Project Title:</b>   | Tire Efficiency Environmental Impact Report |
| <b>TN #:</b>            | 270620                                      |
| <b>Document Title:</b>  | Public Comment                              |
| <b>Description:</b>     | Comment                                     |
| <b>Filer:</b>           | Alexander Salter                            |
| <b>Organization:</b>    | N/A                                         |
| <b>Submitter Role:</b>  | Other Interested Person                     |
| <b>Submission Date:</b> | 6/16/2026 4:28:48 PM                        |
| <b>Docketed Date:</b>   | 6/16/2026                                   |

Dear Commissioners,

I appreciate the California Energy Commission's efforts to reduce fuel consumption and greenhouse gas emissions. Improving vehicle efficiency is an important goal, and I support policies that deliver meaningful environmental benefits while preserving consumer choice, safety, and affordability.

However, I am concerned that the proposed Replacement Tire Efficiency Program places too much emphasis on rolling resistance and fuel economy while overlooking important real-world tradeoffs. In practice, many consumers choose replacement tires because they offer characteristics that original-equipment tires do not, including longer tread life, improved wet-weather and snow traction, greater durability, enhanced ride quality, and better performance in a wider range of driving conditions.

By effectively steering the market toward lower rolling-resistance tires, the proposal risks reducing consumer choice and limiting access to replacement tires that prioritize longevity and traction. Consumers in areas that experience heavy rain, mountain travel, or other challenging driving conditions may find that fewer products are available that meet their needs.

I am particularly concerned that the regulation may encourage the use of tires with shallower tread depth or designs optimized primarily for fuel economy. While such tires may improve vehicle efficiency by a small amount, they may also wear out more quickly and provide reduced traction as they age. If replacement tires last substantially fewer miles before requiring replacement, Californians will be forced to visit tire shops more frequently and spend more money on replacement tires over the life of their vehicles.

The environmental implications also deserve closer scrutiny. Manufacturing, transporting, and disposing of tires consumes significant resources and generates waste. If this regulation results in shorter tire life and more frequent replacement cycles, California could see millions of additional scrap tires generated over time. Any fuel savings achieved through modest improvements in rolling resistance must be weighed against the environmental costs associated with increased tire production and disposal.

In my view, the proposal risks prioritizing a relatively small gain in fuel economy at the expense of consumer choice, tire longevity, and broader environmental sustainability. A regulation that saves a small amount of fuel but results in more frequent tire replacement, increased costs to drivers, and greater material waste may ultimately produce outcomes that are inconsistent with California's environmental and consumer-protection goals.

I respectfully urge the Commission to reconsider the proposed standards and conduct additional analysis regarding tire longevity, real-world safety performance, consumer choice, life cycle environmental impacts, and tire waste generation before moving forward.

Thank you for your consideration,

A handwritten signature in cursive script, appearing to read "Alex Salter".

Alex Salter  
San Mateo County Resident