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## **In Opposition to 26-TIRE-01 as an Automotive Enthusiast**

I am writing to express my clear disapproval of the proposed Replacement Tire Efficiency Program, specifically regarding the rigid Phase 1 and Phase 2 sales bans on aftermarket tires that exceed rolling resistance caps. While the initiative aims to reduce state-wide emissions, implementing an outright ban represents a flawed regulatory approach. Consumers in California already possess the agency and market options to choose high-efficiency tires if maximizing fuel economy is their priority. Restricting consumer choice via product bans is an unnecessary intervention that penalizes drivers for what is fundamentally a market education issue.

While I firmly believe manufacturers should be held to high corporate standards, a universal, forced cap across all tire categories is the wrong mechanism. Instead of outright bans, the commission should implement a tiered framework or split-market certification. Under this model, manufacturers would be held to strict efficiency benchmarks for mass-market commuter vehicle tires, while specialty, enthusiast, and track tires would be classified under a separate tier with distinct performance metrics. This allows the state to enforce manufacturing standards on high-volume products without forcing an restrictive, single-metric constraint on specialized safety equipment.

Tire engineering requires balancing competing metrics; maximizing dry-weather traction, cornering stability, and braking safety for track and high-performance applications necessitates compounds that naturally yield higher rolling resistance. The projected average lifetime savings of \$150 to \$180 per set of tires are marginal and do not justify the severe loss of utility for these vehicles. Rather than moving forward with restrictive bans that disrupt a major enthusiast market, the California Energy Commission should withdraw the proposed sales prohibitions and pivot toward this tiered standard combined with robust data transparency and standardized consumer labeling.

Thank you for your consideration to this issue.