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Please Reconsider this Project

I am an automotive enthusiast, consumer advocate, environmentalist, and someone who manages my family's finances. I hope the energy commission understands the disastrous publicity of this seemingly well-meaning project.

I spent my academic career studying the historically regressive burdens put onto California consumers such as our outdated and mis targeted smog requirements for personal vehicles. The disaster to the working class AND our environment that was the clash for clunker program. This proposed project follows California's tainted legacy.

Yes, consumer protection is valuable. Make tire efficiency transparent. Require replacement tire sellers to follow a standard disclosure and a binary rating which shows whether the tire has better or worse rolling resistance than the OEM equipment. After that, let the consumer decide what they do with this information.

Tires with longer tread wear may not always have better rolling resistance. When doing a cost/benefit analysis, a family may choose to go with a tire that is less efficient than oem. Weather conditions, vehicle use case, aftermarket wheel selection, can all also contribute to a consumer wanting to select a tire with MORE rolling resistance. While the language in these documents suggest exemptions, the root of the issue are the mandates that need exemptions on the first place. They should NOT exist.

A manufacturer is already heavily incentivized to gamify EPA mileage standards and have the economy of scales to corroborate with tire oems to optimize for the rolling resistance metric while sacrificing other attributes that a consumer wants. It would be a huge overstep remove this choice from the consumer and a huge win for OEMs that can profit from markups on these proprietary tire compounds.

Our primary source of pollution is not going to be abated by the negligible deviations achieved by removing consumer choice as suggested by this ill conceived project. We, the consumers, are not the problem. The threats to our health and environment come from the revival of coal in my birthtown of Oakland, the data centers used to fuel technologies that have no net benefit to society. Please do not waste our tax dollars on this project and further taint the political capital of environmentalists.