

DOCKETED	
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Description:	N/A
Filer:	Spencer Kelley
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	6/18/2026 8:32:57 AM
Docketed Date:	6/18/2026

From: [ernesto reyes](#)
To: [Energy - TIRES](#)
Subject: Replacement Tire Efficiency Program
Date: Sunday, May 31, 2026 9:46:12 PM

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Good evening,

I am writing this to notify of my objection to the proposed change in tire requirements for the state of california. While the reduced energy consumption of vehicles sounds good on paper. We are not considering downstream effects of reduced rolling resistance. By reducing rolling resistance we are reducing tire life and braking in inclement weather. This will make roads unsafe by potentially increasing accidents. Reduced tire life will create a larger carbon footprint due to increased tire production. By having to meet these demands tire manufacturers will increase their prices on their products. This will have a double impact on consumers. Consumers will spend more money on tires and more frequently due to these proposed requirements for tires. In these trying times with record inflation, it appears that this does not have any positive impacts as energy consumption is simply being kicked down the road.

Ernesto Reyes

From: [Fred Nowbakht](#)
To: [Energy - Docket Optical System](#)
Subject: Docket Number 26-TIRE-01 (My comment)
Date: Monday, June 1, 2026 4:37:16 PM

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Reference to :

Title: [ken dennis Comments - Do not restrict quality tires for vehicles in California](#)

Note that short life tires in addition to the waste and rubber disposal – we also increase the carbon footprint due to additional tire production as well as shipping and transporting it to the tire centers (more often than before)

Regards

Fred Nowbakht

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Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the company.

From: [Erwin Coumans](#)
To: [Energy - TIRES](#)
Subject: tw200 for track use
Date: Tuesday, June 2, 2026 7:11:48 PM

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Exception for road-legal vehicles driven on track?

For example, when doing track days in Sonoma/Laguna Seca, can we bring wheels to the track with tw200 tires? That way, we don't use them on the road.

<https://www.energy.ca.gov/proceeding/replacement-tire-efficiency-program-proceeding>

From: [Matt Davis](#)
To: [Energy - TIRES](#)
Subject: Replacement Tire Efficiency Proposed Program
Date: Tuesday, June 2, 2026 4:59:14 PM

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No one asked for the "Replacement Tire Efficiency" program. We the people would like freedom of choice, sure this program might create savings and different options. If we want more efficiency we can buy a longer lasting efficient green tire, if we want better grip and safety we can buy that option; alternatively, maybe we want a tire that's great in the rain. Allowing this act to pass will limit our options based on our specific car, needs and wants and how we operate the vehicle we are putting the tires on.



From: [Griffin Burke](#)
To: [Energy - TIRES](#)
Subject: Comments on Replacement Tire Efficiency Program and Performance Tire Standards
Date: Wednesday, June 3, 2026 11:41:04 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the California Energy Commission,

I am writing to express concern regarding the proposed Replacement Tire Efficiency Program and its impact on the availability of performance tires in California.

While I support efforts to improve efficiency and reduce fuel consumption, the current proposal appears likely to eliminate or severely restrict the sale of many high-performance tire models that consumers purchase specifically for safety, vehicle performance, motorsports participation, and enthusiast use, not fuel economy.

Performance tires are intentionally engineered with different priorities than economy-focused tires. Consumers who purchase ultra-high-performance summer tires, track-capable tires, and other performance-oriented products are making an informed tradeoff between efficiency and vehicle handling, braking performance, wet-weather grip, and overall vehicle control.

Applying a single rolling resistance threshold across broad categories of replacement tires risks removing entire segments of the market while producing little meaningful fuel savings for the consumers who actually purchase these products.

The proposal could reduce consumer choice, negatively impact automotive businesses, tire retailers, repair facilities, motorsports organizations, and thousands of California vehicle owners.

Most importantly, consumers should retain the ability to choose products that match their needs. A driver seeking maximum fuel economy should have that option. A driver seeking maximum handling, braking, or performance should have that option as well.

A more balanced approach would be to establish rolling resistance requirements by tire category rather than applying standards that effectively prohibit many performance-oriented products. Dedicated performance tire classes could be assigned separate compliance thresholds that reflect their intended purpose while still encouraging efficiency improvements within that segment.

This approach would preserve consumer choice, support California businesses, and maintain access to tires designed for performance and safety while continuing to advance the Commission's efficiency objectives.

I respectfully urge the Commission to reconsider the current structure of the proposal and explore category-specific standards that recognize the substantial differences between economy-focused and performance-focused tires.

Thank you for your consideration.

Sincerely,
Griffin Burke
Marin County, CA

From: [John Beckos](#)
To: [Energy - TIRES](#)
Subject: Read the proposal...
Date: Wednesday, June 3, 2026 4:51:24 PM

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What about snow tires, mud tires, and all terrain tires that are not OE, and what about competition amongst companies, whomever has proposed this has to be the dumbest person alive, who is the politician that has allowed you to come up with this? Here is how you fix your ignorance...test tires, put ecology ratings on them based on mileage (mpg on average vehicle), friction resistance, and energy used to manufacture, put thoes ratings on the tire just as you put energy ratings on appliances, and let the consumer decide, then you are educating the public rather than ramming your idiotic ideas down the people's throats. Thank you for listening to me.

-John

P. S. I hope this is just rage bait.

From: [Akshay Patel](#)
To: [Energy - Docket Optical System](#)
Subject: Tire Limitation proposal
Date: Thursday, June 4, 2026 11:03:30 AM

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In what world is banning tons of types of tires and forcing consumers to pick state-sanctioned tires make any sense?

Just let consumers make their own damn choices.

Akshay Patel

From: Alex Salter [REDACTED]

Sent: Thursday, June 4, 2026 5:21 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Public Comment on Proposed Replacement Tire Efficiency Program

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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,
Alex Salter
San Mateo County Resident

From: Blake Kelley [REDACTED]
Sent: Thursday, June 4, 2026 11:49 AM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: Docket No. 26-TIRE-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the California Energy Commission (CEC) Docket Unit:

As a former professional diesel technician and current automotive prototype manufacturing business owner based in San Diego, I am writing to formally challenge the data and assumptions presented in the Draft Environmental Impact Report (EIR) for the Replacement Tire Efficiency Program (Docket 26-TIRE-01).

The Draft EIR's projections regarding both consumer cost savings and net CO2 reductions are fundamentally flawed because they fail to account for real-world tire degradation caused by California's well-documented highway and local road conditions.

To achieve the proposed rolling resistance targets, tire manufacturers must utilize stiffer tread compounds or alter tread block designs. While these highly efficient tires may achieve the CEC's projected lifespan on smooth laboratory testing drums, the physics of tire wear change drastically in the real world. Stiffer compounds suffer from accelerated wear, chunking, and heat-cycling degradation when subjected to the highly abrasive, poorly maintained, and pothole-damaged asphalt that is prevalent across San Diego and the rest of the state.

If California's neglected road surfaces force consumers to replace efficiency-compliant tires at 30,000 miles instead of 50,000 miles, the Draft EIR's environmental calculations completely collapse. The massive carbon footprint, petroleum usage, and particulate pollution associated

with manufacturing, shipping, and disposing of an increased volume of tires will entirely negate the projected tailpipe emission savings.

By ignoring the variable of actual state infrastructure conditions, the CEC is relying on laboratory data that does not reflect physical reality. Moving forward with a mandate based on this incomplete data renders the rulemaking process arbitrary.

I urge the Commission to halt the current progression and mandate a revised EIR that includes real-world treadwear modeling on actual California road surfaces before finalizing this regulation.

Sincerely,

Blake Kelley

Blake Kelley Prototypes

San Diego, California

From: [Brian Jones](#)
To: [Energy - Docket Optical System](#)
Cc: [Energy - TIRES](#)
Subject: Public Comment: Docket 26-TIRE-01 - Opposition to Replacement Tire Efficiency Program
Date: Thursday, June 4, 2026 1:34:55 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the California Energy Commission,

I am writing to formally log my opposition to the proposed Replacement Tire Efficiency Program under Docket 26-TIRE-01. While reducing carbon emissions is a laudable goal, the current framework relies on a fundamentally flawed premise that will inadvertently punish California's working class and compromise highway safety.

I urge the Commission to reject or substantially amend this proposal based on the following critical real-world impacts:

1. A Devastating Financial Burden on Working-Class Commuters

For working families, especially those of us covering long highway commutes across the Central Valley to earn a living, our vehicles are essential lifelines. The CEC estimates this regulation might save a driver \$79 to \$153 in fuel over four years. However, this entirely ignores the exorbitant upfront cost of replacing tires twice as often. Because low-rolling-resistance factory tires often wear out in 25,000 to 30,000 miles—compared to the 60,000+ mile lifespan of standard aftermarket tires—this regulation will force drivers to absorb an \$800 to \$1,200 tire replacement bill years earlier than expected. In an already struggling state economy, erasing a minor fuel saving with a massive, recurring maintenance bill places a crushing and unacceptable financial burden on lower-income commuters.

2. Compromising Vehicle Safety and Traction

Grip and rolling resistance exist in a direct physical trade-off. To meet strict efficiency targets, OE tires frequently utilize harder rubber compounds and shallower tread depths. By effectively banning aftermarket tires that prioritize superior grip, this regulation will force drivers onto less responsive rubber. This poses a severe safety risk during emergency maneuvers, heavy hauling, and wet-weather driving, where maximum mechanical grip is a critical safety requirement, not a luxury.

3. Environmental Counter-Productivity

The proposal overlooks the full lifecycle environmental impact of tire manufacturing. Mandating that replacement tires match OE efficiency will inadvertently force manufacturers to produce tires with significantly shorter lifespans. Forcing California consumers to buy, use, and dispose of twice as many tires over the lifespan of a vehicle creates a massive influx of scrap tire waste and accelerates energy-intensive manufacturing emissions, completely erasing the theoretical tailpipe CO2 savings.

Forcing aftermarket replacement tires to mimic low-rolling-resistance factory tires reduces consumer choice, radically increases long-term household costs, and compromises highway safety. I request that the CEC halt this proposal and conduct a more rigorous economic analysis regarding tire longevity and the financial hit to working-class residents before moving forward.

Thank you for your time and consideration of these comments.

Sincerely,

Brian Jones
Fresno, CA

From: [David Mathog](#)
To: [Energy - Docket Optical System](#)
Subject: Comment on 26-TIRE-01
Date: Thursday, June 4, 2026 12:27:51 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Energy Commission,

I recently was in the market for replacement tires for a 2007 Prius. The original tires were Bridgestone Ecopia and were low rolling resistance. Other than that they were terrible tires. Poor grip in the wet, mediocre grip when dry, poor wear. Unfortunately I was unable to find any reliable information on tire rolling resistance when shopping for replacements. Looking at the rules proposed to address this I see that they are once again typical of the state's nanny mindset, and pretty much worthless in helping the consumer choose tires. I don't want a set of rolling resistance tires that do not meet my other needs, and your bill does not address those needs in any way. The state cannot, and should not even try to, foresee what all the tire needs are for everybody in California. Also, we aren't idiots, we can make our own best choices if we can get the information. So I propose that you chuck the entire bill and replace it with a comprehensive testing program. Have the AQMD (because they already have similar testing programs for vehicle emissions) set up a tire testing program which for any tire sold in California would measure for new tires:

1. rolling resistance (at some standard temperature, like 25C)
2. tire grip in wet conditions
3. tire grip in dry conditions
4. tire grip in very cold conditions
5. tire wear
6. tire noise (because it is trivia to measure during one of the other tests)

(They should also have a program where they borrow tires from the public for subsequent testing after they have worn. Tire performance can change as they age.)

Then just post those values in a publicly available database. We can do the rest. And don't dumb down the numbers into "grades". Consumers can make better use of a rolling resistance number ("0.1" in some arbitrary units), vs.. "A" (which might include "0.1" to "0.3", we can't choose the former over the latter if the difference is hidden).

Technical points - the dollar values for saving are nonsense. They don't take wear into account, they don't take price into account. An efficient tire that is expensive to buy and wears out quickly is no bargain, it isn't even a good environmental choice.

Minimum rolling resistance values is the nanny state talking. Some of us would rather be able to panic stop in 30 ft. less than pick up 0.5 mpg. Because 30 ft. is the difference between being in a wreck and not. Tires that save me \$100 and wreck my car are again, no bargain.

The rule should have some clause about data and cost sharing with other states. No reason that California should have to pay for all this testing alone when the same tires would be sold all over the US.

In closing, and to reiterate, the state should put more effort into providing its citizens with comprehensive and accurate information on this product, and less into trying to make purchasing decisions for us.

Regards,

David Mathog

From: [Justin Gerard](#)
To: [Energy - Docket Optical System](#)
Subject: CEC replacement tire efficiency program
Date: Thursday, June 4, 2026 7:09:39 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

You must exempt tires with treadwear lower than 300 from this rulemaking. All motorsports and autocross tires are 200TW and banning them would harm enthusiasts. These represent a tiny amount of all tires bought in CA, and for the stated purpose of efficiency and truth in marketing, nobody is buying Michelin Pilot Sport Cup 2 tires for their model 3 and being misled into thinking they're going to get the same mileage.

Best,
Justin Gerard
San Jose CA

Sent from my iPhone

From: Maura Rogers <[REDACTED]>
Sent: Thursday, June 4, 2026 2:55 PM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: Docket Number 26-TIRE-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This email is written in opposition to the CEC's Replacement Tire Efficiency Program rulemaking (OAL Notice File No. Z2026-0324-03), which was published on 4/24/2026 in Notice Register 2026, No. 17-Z.

Concerns have been raised regarding the cost effectiveness of the proposed regulations and its impact both on regular customer car tires and on speciality tire markets for off road vehicles (light trucks) not excluded in the proposal and for high performance cars that require high performance tires which also aren't excluded in these proposals. The impact of the potential ban on these speciality tires will negatively affect thousands of jobs and industries. The regular car consumer will potentially be required to replace the replacement tires more often which will cost more during the life of the car than under the current regulations. The environmental impact is negligible in comparison to the economic impact, particularly in the current economy. There are other options which would have less impact on these industries and consumers and help the environment that aren't being considered.

I would urge the commission to reject the proposal and continue the discussion with further study as to how we can both help the environment and protect the economic concerns.
Thanks, Maura Rogers Unsoeld

From: Rodger Nelson [REDACTED]
Sent: Thursday, June 4, 2026 9:43 AM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: Docket Number 26-TIRE- 01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the California Energy Commission:

I am strongly opposed to your proposed tire efficiency rule currently under consideration.

It is frankly infuriating to live in a state where government bureaucrats believe they are more qualified to make decisions than individual consumers are. I have read your proposed rule making document and find it absolutely absurd.

I jump straight to the point: THE FREE MARKET WILL (and does) A FAR BETTER JOB of allowing individual consumers to optimize the overall performance and cost of everything, including the fuel economy of their vehicles.

Now, specifically for myself, I am an automotive enthusiast/hobbyist, so further restriction from the California government on my favorite pastime is completely unacceptable to me. We love many things about living here, but restrictions like what you're proposing are making life here worse, and are a primary reason my wife and I are keeping one foot out the door and not committing to living in California long-term.

Now, let me just mention a couple of specific problems I see:

- I have a 2016 Dodge Charger SRT392 — it has a 6.4L Hemi V8, which, SURPRISE! Is not strictly necessary for moving the car down the road! Wow, I must be some kind of massive idiot to have bought a vehicle that isn't as efficient as humanly possible! Wow, I really wish some government official had stepped in to tell me what a moron I am and let me know that I could have saved gas by getting a Prius! Clearly I'm being ironic - I completely understand what I'm doing, and do so willingly.

— Also, for my idiotic muscle car, I have better tires (again, for me and my use case) than what came on the car from the factory. From the factory it had Perelli PZero tires, but I run a Michelin PS4S on the street, which are significantly better for how I use my car.

— I also take my car to the racetrack, for which I switch to a 220 treadwear Goodyear Eagle F1 Supercar3, which, guess what PROBABLY HAS HIGHER ROLLING RESISTANCE AND WORSE FUEL ECONOMY than my stock tires, but do you really think that's a consideration when I'm doing max effort laps on a racetrack getting about 2MPG?!?!

- I have a 2022 Ford Bronco with a suspension lift which, of course, has aftermarket off-road tires ... do you really think I'm too stupid to understand both of those things negatively impact my fuel economy? A Bronco even in factory form is absurdly inefficient relative to other options we could have chosen, but THAT'S OUR CHOICE!!!!

- I have a 1965 Ford Mustang that I've heavily modified, and it has modern tires that an engineer from 1965 literally could not have imagined - what would your rule making say about that? Would I have to downsize to a 13" bias ply tire so I make sure the car is "original"

- My daughter has a 2014 VW Beetle for which I just bought Michelin CrossClimate tires for because SHE'S ABOUT TO GO TO COLLEGE IN IDAHO and needs better cold weather and snow performance than the factory tires offer - would I be handcuffed from making that choice which is better in every way, most importantly my daughter's safety, just because some unaccountable California commission thinks it'll hurt fuel economy?!

In closing - MIND YOUR OWN DAMN BUSINESS and don't dictate to me (who, yes, does know better than you) what the correct consumer choices are - I am more than capable of making my own informed choices. I worked at a tire store in high school, I have an engineering degree, and most importantly, nobody is going to be more careful and thoughtful about how I spend my own money than I am.

Rodger M Nelson



From: [Shawn Yang](#)
To: [Energy - Docket Optical System](#)
Subject: Public Comment Opposing Proposed Tire Efficiency Standards
Date: Thursday, June 4, 2026 10:35:52 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am a California resident and performance vehicle owner.

I oppose the proposed Replacement Tire Efficiency Program.

Tires are safety-critical products. Grip, braking performance, heat resistance, and wet-weather handling should not be sacrificed for relatively small fuel economy gains.

Many popular ultra-high-performance tires are designed specifically for safety and vehicle control. Restricting their availability could negatively impact both consumers and California's automotive aftermarket industry.

The proposed rolling resistance standards may significantly reduce consumer choice for enthusiasts, motorsports participants, and owners of high-performance vehicles.

I respectfully request the California Energy Commission reconsider the proposed standards and provide exemptions or alternative compliance pathways for ultra-high-performance and motorsports-oriented tires.

Shawn Yang

From: Steve Mazza [REDACTED]
Sent: Thursday, June 4, 2026 9:55 AM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: 26-TIRE-01 comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The proposed "Replacement Tire Efficiency Program Rulemaking" is a terrible idea. Consumers can figure out what tires are appropriate for their own vehicles. Stop trying to control every breath that your citizens take.

Steve Mazza

From: Alexander Villalobos



Sent: Friday, June 5, 2026 5:45 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Tire Efficiency

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Question, is the Energy Commission going to help me monetarily when it's time to replace my tires? Because all this time, effort, and money that we currently don't have in our pockets, thanks to our State Taxes, was spent in this study.... what was there to study? Of course efficient treads are gonna be efficient. A 5th grader can tell you that. Now back to the topic at hand, so what is the next step? Because if legislation goes through with it, ok what now? Are you also going to conduct a study on fuel octane levels and see which ones are more efficient on vehicles?, how about driver and passenger weight limits? Forged wheels vs steel wheels? I mean the list can go on... What else is taxable and can be heavily government regulated? How much more money from our pockets are you willing to take? We are struggling out here and all you care about is "tire efficiency" dressed as another money grab hidden as taxes for your benefit not the benefit of the citizens of California. I hope you all sleep in the warm side of your pillows every night.

From: [Brian Turner](#)
To: [Energy - Docket Optical System](#)
Subject: Replacement Tire Efficiency Program public comment
Date: Friday, June 5, 2026 1:33:09 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I'm writing in opposition to the proposed program. Many sport car owners use high performance summer or road legal track day tires that would fail to pass these new standards. Many sport car enthusiasts, myself included, don't typically commute with these cars and use them for the weekend or the occasional track day experience only. This proposed program will fail to make a sizable positive environmental impact within this group due to the limited and specialized use of these vehicles, and the proposal seems to be primarily targeting this small group of consumers. People who put in long, high mileage commutes on a regular basis are not choosing these kinds of tires in the first place, legislation is unnecessary.

Furthermore, the idea of limiting consumer choice is deeply disturbing. If consumers want to choose a tire for better efficiency, longer lifespan, and cost savings, the consumer does NOT need restrictive legislation to enforce this. People who commute regularly or have long mileage drives will naturally choose longer lasting, cheaper tires. This proposal is unnecessary and only hurts consumer choice.

Lastly, when a sport car owner is driving stickier tires, given safe weather conditions, they are actually safer driving on these kinds of tires. Better grip around corners, quicker ability to bring the car to a stop or avoid collisions. I realize we all have a concern over speeders on public roads regardless of the types of cars involved, but by limiting tires to harder compounds with less grip, you ARE going to have more accidents that may have otherwise been avoided. This proposal does not examine the safety aspect at all.

The proposal speaks of savings, which again the average consumer with a long commute is naturally not going to choose these kinds of tires in the first place, making this proposal unnecessary. The proposal speaks of environmental benefits, but only on a very limited group of car owners that are primarily weekend only enthusiasts. I believe the benefits are dramatically overstated as the majority of cars on the road will never use these kinds of tires to begin with. And by forcing enthusiasts to use harder compound tires with less grip, you are going to cause accidents that may have been available. The proposal does not speak on safety at all, which is deeply disturbing.

I feel the proposal fails to consider these points and is largely unnecessary and will be ineffective. Perhaps a better solution would be a small tax on these kinds of tires, though I feel it would also be unnecessary, at least consumers who only drive their cars to and from a racetrack or on weekends will still be able to purchase what they want. I feel giving consumers a carrot on a stick is always better than pointing a legislative gun at them. This proposal fails to examine the other side of the coin, fails to address the overwhelming majority who will never use these kinds of tires, and hurts both fun and freedom for enthusiasts who aren't commuting regularly anyway. It's just wrong, please vote no, thank you.

From: Donald Lew [REDACTED]

Sent: Friday, June 5, 2026 4:07 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Replacement Tire Efficiency Program

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings, my feedback on the proposed restriction of tire choice upon replacement of factory supplied tires on our vehicles: Over reach, excessive restriction on consumer choice w/o substantiated benefits. This is a waste of time and resources trying to implement such a proposal. Environmental benefits can be better accomplished via programs with more likely success. At this time, in a country of crisis and distrust, a proposal like this will be met with a huge negative response by the public, further damaging the very limited trust and faith in government presently.

Improve public transportation, maybe even make it free. Promote EV cars, and hybrids. Decrease the excessive requirements to register older cars on the road, thus saving State enforcement costs, and saving public costs. The number of cars such as the Leno law proposed is minimal in terms of actual miles driven. Free up traffic flow so less cars are stuck in traffic idling away gas.

Let's improve the trust the public has in the Govt agencies and programs.

Donald Lew
510-816-1495

From: [HFRick Morrison](#)
To: [Energy - Docket Optical System](#)
Subject: Replacement Tire Efficiency Program: 26-TIRE-01
Date: Friday, June 5, 2026 1:07:35 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am writing to express my opposition to California's Proposed Replacement Tire Efficiency Program.

I am a private citizen who typically keeps a car in safe, roadworthy condition for 10-15 years from date of purchase. In my six decades of driving California highways, I have purchased new cars from the factory, slightly used cars and trucks with remaining "new car" warranty, and even an old car far beyond warranty for use as a daily commute-to-work vehicle. Each of them owned (not leased) as a long-term commitment (10+ years). This means I buy replacement tires ... lots of replacement tires. I shop for replacement tires.

When I shop for tires, I consider these things:

- Cost
- Durability and expected life
- Fuel efficiency
- Ride

My fear remains: proposed rules that go beyond safety will persuade manufacturers to sell their products elsewhere ... not in California. And my choices erode. Please let the market decide this one.

Thank you for your consideration,
Hadley Morrison
Third Generation Native Californian
Bakersfield, California

From: Joe Cloyes [REDACTED]

Sent: Friday, June 5, 2026 3:09 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Replacment Tire Efficiency Program Concerns

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am writing as a concerned Californian around this new proposal. There are two major flaws in your proposal around Green house gas reductions and cost savings to consumers

1. More efficient tires will help reduce gasoline used but will lead to more tires being made to handle the faster wear cycles on these low resistant tires. The net

environmental effect will clearly be worse as you use so much energy to create a tire.

2. Because these tires will wear out faster you will spend more money lifetime on tires and in addition these tires will cost more per tire. Any lower drag tire has a higher price point and that is clear if you check any tire website.

This proposal sounds good at first but any research proves it will simply increase costs across the board for Californians and in addition will actually hurt the environment.

Thank you

Joe Cloyes

From: Andrew [REDACTED]

Sent: Saturday, June 6, 2026 10:08 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Replacement Tire Efficiency Proposal

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am writing to voice my strong and heartfelt opposition to this proposed regulation.

There are hundreds of other avenues that should be gone down first, before government

goes down this one. Fuel removal, forest floor brush cleanup which the Sierra Club and Newsom have blocked or dragged their feet on. He has ignored his constituents, the will of the people. There is budget for it, he refuses to do it.

Even when the tire regs are expanded out to all passenger vehicles and to lower order enthusiast tires (they will be, don't lie-) one single wildfire season completely negates the theoretical benefit of this infinitesimally minor change. Get your house in order, then and only then should I hear murmurs of tire regulations.

Abandon this idea entirely, and apologize for even entertaining it.

Best,

Andrew Ronstadt

From: Desmond Ho <[REDACTED]>

Sent: Saturday, June 6, 2026 8:34 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Opposition to Docket 26-TIRE-01 Replacement Tire Efficiency Rulemaking

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the California Energy Commission:

My name is Desmond Ho from Santa Cruz, CA and I strongly oppose the proposed Replacement Tire Efficiency Program under Docket 26-TIRE-01.

This rule would impose significant new restrictions on the tires available to California consumers while increasing costs and reducing consumer choice. The Commission's own economic analyses acknowledge that consumers will face higher tire prices as the regulation becomes more stringent. At a time when Californians are already struggling with some of the highest costs of living in the nation, the state should not be making essential vehicle maintenance more expensive.

The proposal appears to prioritize rolling-resistance targets over the diverse performance needs of California drivers. Many consumers purchase tires based on factors such as wet-weather traction, durability, tread life, handling, towing performance, and most importantly, safety. A one-size-fits-all efficiency mandate risks reducing the availability of products designed for these legitimate purposes.

I am particularly concerned that the regulation could limit future availability of specialty, performance, all-terrain, and other niche tire categories. Government agencies should not be in the business of narrowing consumer choices unless there is overwhelming evidence that the benefits clearly outweigh the costs and tradeoffs. That burden has not been met.

The Commission projects fuel savings and emissions reductions, but those projections rely on assumptions about future consumer behavior, tire performance, and market responses that may not reflect real-world conditions. If consumers are forced to purchase more expensive tires, replace them more frequently, or settle for products that do not meet their driving needs, the claimed benefits could be overstated. Moreover, any reduction in tire durability could create additional waste and environmental impacts that are not fully accounted for.

This rule also creates additional compliance burdens for manufacturers, retailers, distributors, and dealerships. California's unique regulatory requirements frequently result in reduced product availability and increased costs for residents. The state should be removing barriers to affordability, not creating new ones.

Consumers already have the ability to choose fuel-efficient tires if they wish to do so. The marketplace provides a wide range of options, allowing drivers to balance efficiency, safety, performance, longevity, and cost according to their own needs. Government mandates are not necessary to make these decisions for them.

For these reasons, I urge the California Energy Commission to reject the proposed

regulation in Docket 26-TIRE-01 or substantially revise it to protect consumer choice, affordability, and access to a full range of tire products.

Thank you for considering my comments.

Sincerely,

Desmond Ho

From: Katherine Reid [REDACTED]
Sent: Saturday, June 6, 2026 9:16 PM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: Replacement Tire Efficiency Program

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern:

I'm writing to voice my opposition to the Replacement Tire Efficiency Program that's been proposed that could become law on January 1, 2028 if approved.

Making it to where tires in California have such a low rolling resistance (max 10.5 N/kN) so that they last less than 30,000 miles is going to put an added expense onto vehicle owners in this state when it's already tough enough to be able to afford to live here. Not only that, the process for making tires is not clean environmentally, so any CO2 emissions you might lower with low rolling resistance tires would be cancelled out by the necessary increased manufacture of tires (plus increased tire disposal).

California has already been experiencing enough of an exodus of people and businesses; turning this proposal into law would have more people rolling right out of the state and to somewhere more reasonable and affordable.

Please rescind this proposal.

Thank you.

Sincerely,

Katherine L. Reid

[Sent from the all new AOL app for iOS](#)

-----Original Message-----

From: Kevin Byrne <[REDACTED]>
Sent: Saturday, June 6, 2026 8:22 AM
To: Energy - Docket Optical System <doCKET@energy.ca.gov>
Subject: Replacement Tire Efficiency Program.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attn CEC,

I do not see any mention of the shorter life span these replacement tires would have not to mention less safe in snow and rain due to less tread depth.

My experience is the lifespan is 1/2 which not only negates the proposed savings it likely makes the problem worse by greatly increasing the amount of discarded tires.

Please update your proposal to show how you are accounting for this. The last thing CA. consumers need is another expense presented as a benefit.

Just note, when I was in college in the 80's, I was part of a team that modified a vehicle for high mileage competition so I do have a bit of a technical understanding of this.

Thanks for your time,

Kevin Byrne, Rancho Palos Verdes.
Sent from my iPhone

From: Archie Overton <[REDACTED]>
Sent: Sunday, June 7, 2026 4:50 PM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: Tire Replacement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am opposed to this legislature action. I understand the reasonings, but as a member of the off roading community, stock tires just do not compare. If I was run stock tires, I would be blowing tires every trip, thus needing to purchase more tires. If I am close to the roads, I would require tow trucks a lot. This alone would negate any air quality and fuels savings spent for a higher rolling efficiency tire. Not to mention, there would be a lot more tires needed to be manufactured. I would need to carry several spares to keep up with the breakage, with the added weight adding to lower fuel mileage also.

I blown a stock tire on my property about 75' from the road exploring for potential building sites. I have blown off road tires also on trail. Imagine how long a stock tire would last on a trail.

Thank You,
Archie Overton, KO3BFG

From: Charlie Overton <[REDACTED]>
Sent: Sunday, June 7, 2026 7:42 PM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I don't agree on this proposed calif Law!! As it is now I can not afford calif any more!!!!
Stop the stupid rules!!

From: Hayden Baker [REDACTED] >

Sent: Sunday, June 7, 2026 9:37 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Replacement Tire Efficiency Program Proceeding - Comment

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

This proposal has good intentions, but unfortunately, it's a gross oversimplification of a problem that doesn't actually exist. The OE tires initially installed have a shorter tread depth that makes the tire more efficient but last half as long. So, you save waste on gas but increase waste on tires. Even if you replace your tire with the same exact model

directly from the tire manufacturer, the tread depth will be a more normal depth which would initially decrease economy at the cost of lasting longer. To meet standards the manufactures have two options: sell the short depth tire requiring more frequent changes or change the compound at a significant price increase. A tire that could last 75,000 miles will now last 30,000 miles to save less than .5 MPG. This small change would only save 43 gallons of fuel over those 75,000 miles saving the owner about \$200. Conversely, they've used twice as many tires adding about \$1,000 in costs at today's tire prices. The increase in cost per tire from an inside source would be far higher than this bill suggests: \$100-\$200 per tire. If the tire compound is improved with the same tread depth, you're left with a set of tires that costs \$400-\$800 more. In either scenario, that's a significant increase for a large majority of the population, especially considering the minimal gains across 2,500 gallons of fuel.

All that before considering if someone wants to change brands, styles, or size of tires. Perhaps a Subaru owner wants a more capable tire for some light off-roading or a BRZ owner wants a set of stickier tires for driving to a race track. Both drivers would be barred from this as those tires would now be illegal. They either buy and transport a second set of wheels or are stuck with tires that don't meet their needs. This same concept can be expanding to towing focused tires, harder/longer wearing tires for a work van, winter tires for those in the mountains, and every other specialized tire.

Ultimately, this proposed rule removes choice from the car owner for benefits that won't actually materialize. The most impacted will be the lower income families who already struggle with the cost of tires. Additionally, many enthusiasts groups will be impacted from track drivers to off-roaders. The people know what is best for them; they should be left to choose their own tires for their specific needs. I strongly encourage the committee to reconsider this proposed rule. The intent is commendable, but the proposed implementation is a disaster in the making.

Lindsay Okawita PA-C
Los Angeles, CA

From: Hayden Baker <[REDACTED]>

Sent: Sunday, June 7, 2026 9:37 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

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Ultimately, this proposed rule removes choice from the car owner for benefits that won't actually materialize. The most impacted will be the lower income families who already struggle with the cost of tires. Additionally, many enthusiasts groups will be impacted from track drivers to off-roaders. The people know what is best for them; they should be left to choose their own tires for their specific needs. I strongly encourage the committee to reconsider this proposed rule. The intent is commendable, but the proposed implementation is a disaster in the making.

Lindsay Okawita PA-C
Los Angeles, CA

From: Jeff <[REDACTED]>

Sent: Sunday, June 7, 2026 8:51 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Tire efficiency program

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This is insane! The state and feds. get tax money on every tire sold. California needs to back off constant restrictive laws.

The tires that came on the vehicle or otherwise approved may not be able to do what the vehicle owners bought the vehicle for. Enough already.

Sincerely,
Jeff Pipkins

From: [REDACTED] <[REDACTED]>

Sent: Sunday, June 7, 2026 6:47 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Replacement Tire Efficiency Program

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am opposed to this action.

The proposed action presents a false narrative in that it does not account for the increased number of tires that would result for the consumer. Energy efficient tires are not the best

performers when all factors are considered. Manufacture OEM tires wear out faster! Not only are tires expensive, but increased tire disposal costs have not been considered.

John Kunsemiller
Ventura, CA

From: Susan Parkinson <[REDACTED]>

Sent: Sunday, June 7, 2026 11:02 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am against the proposed docket 26-tire-01 tire regulation.

It only looks at a narrow view of tires.

It does not consider the whole picture.

If you do not look at all the the impacts it paints a failed picture. With detrimental effect on the envirement , safety and ultimate cost to the consumer.

Most frequent replacement

further harms the environment as more replacements have to be made, transported, installed, recycled, landfilled, reduced safety benefits and substantial consumer cost. Having substantially more negative impacts on the environment than the narrow benefits proposed.

I am firmly against the misguided tire replacement regulation.

From: C Burgess <[REDACTED]>

Sent: Monday, June 8, 2026 7:58 AM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Docket 26-TIRE-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am writing to express my opposition to the proposed rules on tires. The public should be free to choose tires as they see fit. Tire choice may depend on needs, like if one needs more off road oriented tires based on where they live or recreate. I live on a dirt road and high efficiency tires are not the best choice for winter conditions in my area.

These tires with less tread depth require more frequent replacement and would lead to more waste with increased carbon footprint, which is counterproductive to the state's goals.

I request that the rules not be adopted. The CEC is overreaching in its authority. It's interpretation of its mandate is inappropriate at best, to put energy efficiency over safety of the public.

Regards,

Chris Burgess

[REDACTED]

[REDACTED]

[REDACTED]

From: [Chris Carey](#)
To: [Energy - TIRES](#)
Subject: Tire efficiency program question
Date: Monday, June 8, 2026 11:18:36 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi,

I was wondering how this program would affect those that run larger aftermarket tires for those that drive vehicles marketed towards daily driving and off-road such as Jeeps and Broncos. There is a large market in California for larger tires on these vehicles. Will these be banned by this proposal?

Thank you,
Chris Carey
Sent from my iPad

From: Rob Greaff <[REDACTED]>

Sent: Monday, June 8, 2026 4:50 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Replacement Tire Efficiency Program"

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I love your new car tires are designed to give you better mileage. Fun Fact they are not, replacement tires have longer warranties and offer better options to meet everyone's budget. Did you know that the additive in California fuel causes vehicles to get lower mileage than without it. So lower mileage, more fuel used, more emissions. Did you know the additive causes damage to rubber products and hurts vehicles. Instead of

wasting my tax dollars on these uneducated bills that will put more money in the PACS that support your current political run and when you are done give you a job, try focusing on lowering fuel taxes and creating jobs. This is another waste of time, money and energy for the hard working California tax payers.

Thank you,
Rob

From: [Alan Burt](#)
To: [Energy - TIRES](#)
Subject: .
Date: Tuesday, June 9, 2026 5:07:22 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Seriously, we couldn't make this stuff up if we tried. In a state where you would think they would be busy addressing rampant homelessness, poor water management, raging fires, and budget deficits, they seem to still have enough time to worry that your aftermarket tires are killing the planet and working out a plan to save us all from ourselves! Yeah, we're not shocked since this is California. After all, when you see "49-state compliant" on a go-fast part, guess who the holdout is? It's the land of [crushing emissions laws on 50-year-old cars](#) and often nonsensical CARB regulations. You would think the billions spent on the bullet train to nowhere would be enough to slow them down. Well, you would be wrong. This time around, they decided your aftermarket performance tires are killing polar bears or some other such end-of-days climate-emergency nonsense. Keep in mind this is a state with terrible water and forest management. Remember when a large chunk of Los Angeles burned down? How was that for the environment? Regulating what tires you decide to buy for your daily driver or weekend track car shouldn't even be in their top 100 concerns.

From: C.J. Nord <[REDACTED]>
Sent: Tuesday, June 9, 2026 3:24 PM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: The replacement tire efficiency program

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Does the CEC Hate the Poor?

I am seriously challenging the California Energy Commission to prove that it does not hate poor and working families.

Because from where many Californians stand, the CEC appears committed to raising the cost of living and working in this state so high that poor families are forced into impossible choices: move out of California, become unsheltered, live in a car they cannot afford to maintain, or go without basic necessities.

I am Native American. My culture is deeply respectful of Mother Earth. But respect for the planet can never come at the expense of family survival. If a climate solution threatens family prosperity, then it is not a solution. It is a policy failure.

Growing up, my family could never afford brand-new tires. Many families still cannot. Most people do not have enough savings to absorb a major unexpected expense. Forcing families to buy new tires instead of retreads could be the difference between food, shelter, transportation, and keeping a job.

This is exactly the kind of harm created by the CEC's replacement tire efficiency program. It may look good on paper, but in real life it punishes the people who can least afford it.

We have seen this pattern before. California pushed refineries out of state, even though California refineries are among the safest and cleanest in the world. Now more fuel must be made elsewhere, often under weaker environmental standards, and shipped thousands of miles using bunker fuel. That does not reduce global emissions. It shifts them, increases risk, destroys thousands of California jobs, and raises costs for all families.

The damage to working families is real. The damage to California's economy is real. And the people paying the highest price are the people with the least ability to pay.

Stop hurting California's working poor.

Stop the replacement tire efficiency program.

C.J. Nord, C.P.M., CSCP (She/Her)
Founder, Supply Chains for Good
Enrolled member, Standing Rock Sioux
Cell [REDACTED]
SupplyChainsforGood.org

From: [William Mancilla](#)
To: [Energy - TIRES](#)
Subject: Tire efficiency - traditional tires vs airless tires.
Date: Wednesday, June 10, 2026 1:30:47 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

My comment is why the CEC is not considering the standard being focused on airless tires which would make a significantly more positive environmental impact in reducing waste, environmental contaminants, and efficiency improvements. Here's some information on airless tires since it doesn't seem CEC is aware they exist.

Best regards,

William Mancilla

Administrative Analyst

Advanced Clean Fleets | Sustainability | Compliance and Reporting

City of Sacramento, Department of Public Works

Fleet Management Division

5730 24th Street Building 1, Sacramento CA. 95822



From: [Dani](#)
To: [Energy - TIRES](#)
Subject: Proposed energy efficiency standard for replacement tires
Date: Wednesday, June 10, 2026 10:14:23 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

California has a massive opportunity to slash carbon emissions while putting money back into drivers' pockets. While new cars come equipped with fuel-efficient tires, the lack of standards for replacement tires means drivers unknowingly buy models that drag down fuel economy, cost more at the pump or charging station, and increase pollution.

Car manufacturers typically ship new vehicles with fuel-efficient tires because they are a very low-cost way to help meet vehicle fuel economy standards. However, because there are no efficiency standards for replacement tires, replacement tires generally reduce a vehicle's fuel efficiency, meaning **drivers pay more for gas or electricity and cannot travel as far on a full tank or charge.**

A set of tires only lasts a few years on average, so a typical vehicle will have several sets of replacement tires over its lifetime. Minimum standards ensuring that replacement tires are as good as the tires that come on a new vehicle would **save Californians money and help drivers go further** before needing to refill or recharge while avoiding significant greenhouse gas emissions.

- CEC collected real-world and laboratory data on more than 150 of the most popular tire models. The data is clear: increasing the efficiency of tires does not require reducing their average lifespan or treadwear. Many tires already perform well on both efficiency and lifespan or treadwear.
- The proposed standards would reduce climate warming and human health harming emissions.
- By 2035, the proposed standards would reduce annual greenhouse gas emissions by 2 million metric tons—equivalent to removing 400,000 gasoline vehicles from California roads.
- By 2035, the proposed standards would reduce annual emissions of smog-forming NOx by 430 tons and lung-damaging PM2.5 emissions by 20 tons.

Thank you for considering this proposal.

Danett Abbott-Wicker
Orange, CA

From: c68d72 [REDACTED]

Sent: Sunday, June 14, 2026 7:41 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: Docket No. 22-AAER-01: Replacement Tire Efficiency Program - Public Comment

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear California Energy Commission Rulemaking Committee,

I am writing to express my strong opposition to the proposed Replacement Tire Efficiency Program (Docket No. 22-AAER-01). While I understand the state's goals regarding fuel efficiency, the current framework places an unfair and dangerous burden on California drivers and automotive enthusiasts. By enforcing aggressive rolling resistance mandates modeled after factory-installed tires, the CEC is disrupting the fundamental engineering balance of tire design. To meet these targets, manufacturers will be forced to use harder rubber compounds and shallower tread depths. This compromise directly risks wet-weather safety, reduces traction, and drastically cuts tire lifespans. Forcing consumers to buy replacement tires twice as frequently completely negates the projected financial or environmental savings. Furthermore, the 15,000-unit exemption threshold is completely inadequate for mass-market performance categories. This rule will inadvertently ban popular, street-legal enthusiast tires, track-day rubber (such as 200 UTQG compounds), and drag radials used safely by thousands of law-abiding hobbyists. I urge the Commission to heavily revise this proposal by introducing a sweeping exemption for all Max Performance Summer, Ultra-High-Performance (UHP), and R-compound competition tires, ensuring consumer choice and safety are not compromised. Sincerely,

Daniel Griffin

Bellflower, Ca
[REDACTED]

Sent with [Proton Mail](#) secure email.

From: [David Peters](#)
To: [Energy - TIRES](#)
Subject: Proposed Tire Mileage Regulation
Date: Sunday, June 14, 2026 12:17:13 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The proposed regulations on tire wear isn't needed. California already has too many burdensome regulations for residents. Please don't add any more, especially when not backed by science.

David Peters

David Peters

-----Original Message-----

From: Lisa And Terence Davis [REDACTED]

Sent: Sunday, June 14, 2026 11:18 PM

To: Energy - Docket Optical System <docket@energy.ca.gov>

Subject: 26-TIRE-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

CEC-600-2026-012

Hello,

the Tire Efficiency Program is the most ill-informed proposal I have heard regarding fuel efficiency I have heard of in a long time. It will limit consumer choice, provide an inferior product and reduce competition and increase price.

It also fails to consider the changing purpose of a vehicle; for example, what would you suggest a person do if they move from Santa Monica to Big Bear or Tahoe or Mammoth Lakes? The OEM tires simply will not be fit-for-purpose and will instead increase risk of driving. The operator needs the option to purchase mud-and-snow tires instead of the original all-season or high-performance tires that the vehicle originally came with.

If you want to make a real difference in fuel efficiency, focus on under-inflated tires or road maintenance.

Thank you.

From: [Esteban Lara](#)
To: [Energy - TIRES](#)
Subject: No new tire restrictions
Date: Monday, June 15, 2026 11:29:25 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear California Energy Commission,

I am writing to oppose making stricter energy efficiency rules for tires. I understand you want to save energy, but these rules cause real financial and safety problems families like mine.

These low rolling resistance tires have a high upfront cost, not including the certifications you will ultimately force these companies to obtain, further increasing cost to us overburdened and overburdened Californians.

Families in California already struggle with the highest regulated and highest gas prices in these United States and we are one of, if not THE heaviest taxed Americans. We should not be forced to pay extra for tires just to meet new government rules. We did not ask for this!

Taking away increased cost, these low resistance tires have less grip on the road and less stopping power. It takes longer to stop the car, especially in rain or emergency braking. As a parent, this worries me. California families', children and citizens safety must come first. We should not have to choose between saving a little gas and keeping our kids safe in the car.

Additionally, these tires do not last as long. The OE warranty mileage is lower, or non-existent. This means we have to buy new tires more often. Stop increasing our out-of-pocket expenses. That means more money spent and more old tires thrown away. Making and throwing away extra tires creates more pollution and waste, not less. So these "green" rules will actually increase emissions overall. Unless your mindset is "not in my backyard"... but you will increase greenhouse emissions in somebody's backyard with this foolish legislation.

I also noticed something shady on your website. It says the online comment section is not working, but for this tire topic it clearly tells people to email comments instead. This feels like a tactic to push regular people away and make it harder to speak up. It shows bias and a lack of care for families and over-taxed people in California who are already struggling.

Please stop pushing stricter tire efficiency standards. Let people choose tires that are affordable, safe, and last longer. Family safety and lower costs should matter more than small gains in rolling efficiency.

Thank you for reading my comment.

Sincerely,

Esteban Lara

Salinas, California 93901



From: [Terence Hutt](#)
To: [Energy - TIRES](#)
Subject: Comment on proposed changes for replacement tires
Date: Monday, June 15, 2026 12:49:16 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

How will you allow for people who live on dirt roads or live in snow prone areas?. They require special tires that are not as energy efficient as regular road tires.

Terry Hutt

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From: [Cash Colby](#)
To: [Energy - TIRES](#)
Subject: Regulation
Date: Tuesday, June 16, 2026 3:39:05 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My brand new nissan had “efficient” tires from factory, Brand new, they had 6/32 tread depth and weighed 16 lbs each. In 3k miles they were worn beyond the 6/32 allowed for rotation. In 18k miles they needed to be replaced. At 20k one failed.

The exact same brand, size, tire has 8/32 tread, oddly weighs 2 lbs more, stiffer side wall, and a 40k mile warrantee.

But this replacement wont meet the rolling efficacy of the original factory. Arguably, It is better for the consumer.

So to be green and save money, you want me to drive on flimsy minimal tires and toss them into the landfill every 20k miles, if i don't die when they break!

This is absurd!

What if i need my truck to have a heavy 10 ply tire because i work in areas if rock or need punture resistance?

What if i need higher weight capacity?

What if i want to upgrade my jeep for ground clearance?

Or a higher performance tire for taking a daily driver to the track?

Please just stop! Let me make my own tire choice.

The exact same tire (not produced for factory new car) has 8

Sent from my iPhone