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Replacement Tire Efficiency Program

Additional submitted attachment is included below.



June 15, 2026

California Energy Commission
Docket Unit
715 P Street, MS-4
Sacramento, CA 95814
RE: Docket No. 26-TIRE-01: Replacement Tire Efficiency Program

Dear Commission Staff:

Coalition for Clean Air supports the staff proposal to establish a replacement tire efficiency program. Twenty-three years ago, I supported AB 844, authored by Assemblymember Joe Nation, which delegated to CEC the task of adopting “a tire energy efficiency program of statewide applicability for replacement tires, designed to ensure that replacement tires sold in the state are at least as energy efficient, on average, as tires sold in the state as original equipment on new passenger cars and light-duty trucks.” Neither Assemblymember Nation nor I imagined that the task would take so long, but the staff proposal builds on extensive research and data to fulfill the statutory charge.

Most replacement tires sold in California are surprisingly inefficient. A report published last year by Coalition for Clean Air and the Consumer Federation of America, “Burning Rubber and Cash: How Inefficient Replacement Tires are Costing Californians,” found that standards ensuring replacement tires are as efficient as the ones that come on a new vehicle would save drivers money while reducing pollution.

Car manufacturers typically ship new vehicles with fuel-efficient tires because they are a low-cost way to help meet vehicle fuel economy standards. However, because there are no efficiency standards for replacement tires, many have high rolling resistance, requiring more energy to rotate. Most purchasers unwittingly end up with replacements that waste energy. This hidden expense especially impacts low-income drivers, as they are more likely to own an older vehicle with replacement tires.

Fuel-efficient replacement tires are readily available on the market today and leverage advances in rubber chemistry and tread design to achieve low rolling resistance. Our report cited expert testing data of 149 tires showing that efficient tires do not compromise safety or tire longevity, and CEC’s research confirms those findings. The proposed standards are not even close to technology forcing, as many tires available now already meet the standards.

Statewide, inefficient replacement tires cost California drivers more than \$1.1 billion in 2025 alone, the report estimates. The bulk of these added costs today are for extra gasoline, an average of \$184 over the lifetime of a set of tires; a small but rapidly growing share is for added electricity needed to charge EVs with replacement tires. Our report found that inefficient replacement tires are costing EV drivers an extra \$161 on average for electricity over the lifetime of a set of tires. Inefficient tires are reducing the range of a typical EV by 10 to 15 miles compared to its range with the original tires.

In addition to saving drivers money, implementing tire standards would directly support climate and air quality standards required by law. In this year alone, inefficient tires on California roads are causing additional emissions of nitrogen oxides, particulate matter, and carbon dioxide in amounts equivalent to the annual pollution from nearly three-quarters of a million gasoline vehicles. At a time when California is violating national ambient air quality standards and suffers from by far the worst smog and soot in the nation, we can not afford to forego the emission reductions that can be realized by simply ruling out the least efficient replacement tires.

Tire standards are a straightforward solution to make everyday life more affordable and sustainable. Therefore, we urge staff to finalize the proposal, and we urge the Commission to adopt it without delay or weakening.

Respectfully,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director