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CCA comments on Tire Efficiency Rulemaking

Additional submitted attachment is included below.



July 29, 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 has long supported the establishment of 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.

The many delays in fulfilling the mandate of AB 844 make it particularly disappointing to see still more delays proposed in the recent 15-day changes. Staff’s original proposal called for Phase 1 compliance in 2028 and Phase 2 compliance in 2031, while the proposed revisions push back the compliance dates for Phase 1 by a year (to 2029) and Phase 2 by two years (to 2033). Delaying Phase 2 is particularly problematic because the Phase 2 standards will deliver the vast majority of the program’s benefits—generating most of the consumer fuel savings and statewide emissions reductions—while fulfilling the legislative mandate to ensure replacement tires are as efficient as original equipment tires. Every year of delay defers tangible economic benefits for California drivers and slows progress toward the state’s air quality and climate requirements. A 2032 compliance date would still give manufacturers more than five years to redesign their products for Phase 2. For these reasons, we urge the Commission to adopt a Phase 2 compliance date of no later than 2032.

Furthermore, the amended 15-day language would exempt all-season winter performance tires from the rolling resistance and wet grip standards, with the rationale being that these tires may not meet the wet grip standard. While we understand the rationale for exempting these tires today, we are concerned that this exemption could undermine overall savings over

time. All-season winter performance tires represent a rapidly growing market segment; these tires leverage advanced rubber compounds and tread designs to achieve strong snow traction without sacrificing year-round performance, and they avoid the severe rolling resistance trade-offs typical of dedicated winter tires. Failing to cover this expanding market segment risks leaving significant energy savings unrealized. The Commission should commit now to evaluating and adopting standards for all-season winter performance tires in a future rulemaking, informed by the rolling resistance and wet grip data that will be collected on these tires under Phase 1.

The Commission should closely monitor the 15,000 unit limited-production exemption to prevent loopholes. While the limited-production exemption included in the 15-day changes is intended to provide flexibility for niche or specialty tire lines, we are concerned that this exemption provides a potential compliance loophole. We encourage the CEC to monitor for cases where a manufacturer's total production of a functionally equivalent tire line—across plants, brand names, or minor SKU variations—substantially exceeds the 15,000-unit threshold intended for genuinely limited-production tires. Strong, ongoing enforcement oversight will help ensure manufacturers cannot bypass the standards by fragmenting higher-volume products and will safeguard the expected benefits of the program.

Tire standards are a straightforward solution to make everyday life more affordable and sustainable. Therefore, we urge the adoption of the standards with the provisions recommended in this letter.

Respectfully,

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

Bill Magavern
Policy Director