

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	271746
Document Title:	CalRecycle Support for Proposed Replacement Tire Efficiency Program
Description:	N/A
Filer:	Spencer Kelley
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	7/30/2026 1:18:38 PM
Docketed Date:	7/30/2026



July 30, 2026

David Hochschild, Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

**Re: CalRecycle Support for Proposed Replacement Tire Efficiency Program –
Docket No. 26-TIRE-01; Tire Waste Impacts**

Dear Chair Hochschild and Commissioners:

The California Department of Resources Recycling and Recovery (CalRecycle) appreciates the opportunity to provide comments on the California Energy Commission's (Commission) proposed Replacement Tire Efficiency Program (Docket No. 26-TIRE-01). As the state agency responsible for overseeing California's waste tire management system, CalRecycle recognizes the importance of the proposed program to achieve the state's climate goals. We also appreciate the Commission's consultation with CalRecycle during the preparation of the staff report.

The Commission's proposed tire efficiency regulations recognize that some replacement tires provide significantly superior wear performance and longer lifespans compared to typical replacement models. The proposed regulations are designed to incentivize durable replacement tires by establishing both long-life and ultralong life tire categories that would be allowed to meet slightly less stringent rolling-resistance requirements while still aligning with overall efficiency and safety goals. This tiered approach creates a market incentive for manufacturers to continue investing in and improving tire durability. Longer-lived tires mean fewer replacement cycles, fewer tires entering the waste stream, and potentially a reduced number of tires that would require management under CalRecycle's waste tire program.

CalRecycle supports the goals of the Replacement Tire Efficiency Program and recognizes its potential to contribute to emissions reductions, improved air quality, and lower fuel costs for Californians. Additionally, the proposed regulations specifically exclude used and retreaded tires from its scope, which is appropriate from both a technical and waste management standpoint. Including used tires would have created compliance burdens that could have perversely led to the disposal of serviceable tires. California Public Resources Code (§ 25773) specifies that the Commission shall consult with CalRecycle no less than every three years to review the RTEP programs impact on

waste tire generation and revise the program, if needed. We look forward to ongoing collaboration with the Commission to monitor the impact of the RTEP program on waste tire generation in California.

Sincerely,

Clark Williams

Branch Chief, Statewide Technical and Analytical Resources Branch

California Department of Resources Recycling and Recovery (CalRecycle)