

DOCKETED

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Comment Received From: Laura Deehan
Submitted On: 7/31/2026
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Support for strong tire efficiency standards

Please see attached letter supporting strong tire efficiency standards. Thankyou

Additional submitted attachment is included below.



July 31, 2026

California Energy Commission
Docket Unit
715 P Street, MS-4
Sacramento, CA 95814

RE: Docket No. 26-TIRE-01: Replacement Tire Efficiency Program

To the Commission Staff:

Environment California Research & Policy Center and CALPIRG Education Fund are pleased to provide these comments regarding the California Energy Commission's (CEC) proposed "15-day language" for the Replacement Tire Efficiency Program. As supporters of the enabling legislation, AB 844 (Nation), our organization has remained committed to this process for over two decades, and we welcome the program's impending implementation.

Establishing rigorous efficiency standards for replacement tires represents a dual victory for the state: it provides meaningful economic relief for California consumers through fuel savings while simultaneously curbing the greenhouse gas emissions and harmful air pollutants that adversely impact public health every year.

Despite significant strides in environmental policy, California continues to face the persistent challenge of substandard air quality. We must maintain our momentum in addressing this crisis. By ensuring that replacement tires meet high efficiency benchmarks, this program will serve as a critical tool in reducing the state's pollution burden and advancing our collective climate objectives.

While supporting the Commission's tire efficiency initiative, Environment California Research & Policy Center and CALPIRG Education Fund oppose the delayed timeline and strongly urge a Phase 2 effective date by 2032. We also request a commitment to develop standards for all-season winter performance tires and call for strict oversight of the limited-production carve-out to prevent compliance loopholes.

We advocate for Phase 2 standards by 2032 at the latest. The proposed schedule delays Phase 1 to 2029 and Phase 2 to 2033, deviating from the initial 2028 and 2031 targets. Postponing Phase 2 delays crucial fuel savings and emission reductions. A 2032 deadline offers manufacturers over five years for redesign, which is standard for Commission regulations.

We urge the development of standards for all-season winter performance tires. The current 15-day text exempts these tires from rolling resistance and wet grip rules. Because this growing segment uses advanced chemistry for snow traction without heavy efficiency losses, leaving it unregulated compromises long-term energy savings. The Commission should use Phase 1 data to set standards in future rulemaking.

Vigilant oversight of the limited-production carve-out is imperative. This specialty exemption could become a loophole. The Commission must monitor manufacturers that split identical tire lines across brands or facilities to exceed the 15,000-unit limit and evade benchmarks, thereby protecting program integrity.

Rigorous efficiency standards are critical for delivering fuel savings to Californians and reducing greenhouse gas emissions and harmful air pollutants. We appreciate the Commission's efforts to improve the standards and encourage the above improvements to ensure the rule delivers robust, lasting protection for all Californians.

We appreciate your consideration.

Sincerely,



Laura Deehan
State Director



Fiona Hines
Public Health Campaigns Director