

DOCKETED

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Replacement Tire Efficiency Program Comments

From Michael Bowling [REDACTED]
Date Wed 7/29/2026 8:48 PM
To Energy - TIRES <TIRES@energy.ca.gov>

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Dear Sirs and Madams,

I'm writing to provide feedback and comments on the Replacement Tire Efficiency Program being discussed by the CEC. I have several concerns around this proposed program and will lay them out in the next following sections:

The OEM tires often included on new vehicles when purchased are focused on fuel efficiency to aid in the OEM's earning higher scores in their EPA testing. But there are several factors that go into tire performance. These OEM tires have been developed purely to get the highest EPA rating and show improved fuel economy with the assumption that those tires are not the best balance of performance for every single consumer. Any single tire compound and design is a delicate balancing act of different performance parameters and allows tire manufacturers to tune to the needs and preferences of consumers. These performance parameters include but are not limited to rolling resistance (fuel efficiency), traction and stability (wet or dry), tread life and wear, cost, environmental performance (temperature rating, i.e. all season), speed rating, braking distance, sound and vibration, and other important performance specs. Limiting the availability and variety of tires to consumers prevents them from optimizing the performance of their vehicle to their preferences where drivers may be trading health and safety, cost, and driving performance.

Health and Safety

Consumers who want to optimize their tire performance for the health and safety of themselves and their friends and family as passengers would not have the option to do so if only limited to OEM tires optimized for fuel efficiency. These consumers may opt for less fuel efficiency to improve the safety performance at all costs to protect their friends and family. The reduction in high safety option tires could also put the state at legal risk to people who get into fatal or injury crashes that could have been prevented with a better performing tire. Although this may sound a bit farfetched, the history of tort cases throughout this great state and country is rife with lawyers looking to capitalize on lawsuits around vehicular injuries, especially against the state with its hefty budget and state coffers. As a dedicated citizen of this state that pays fairly large taxes, I would not want to see my tax dollars going towards ambulance chasing lawyers looking to profit off of some poor decisions the CEC may make around this tire program.

Cost

The OEM tires are definitely not optimized for long life or cost. These tires will often wear out faster and incur more cost in purchasing new tires more frequently and may often exceed the potential savings that may be realized from improved fuel economy. It also will depend heavily on the exact type of vehicle to where that cost benefit analysis comes out ahead for different tire options. This puts disadvantaged and lower income citizens of this state under greater financial hardship than they are already experiencing. Also of note, there are hundreds, if not thousands of small business owners in the tire industry that may end up suffering from these regulations. Much fewer tire options will reduce the amount of competition between tire brands and could largely favor OEM dealerships over local small business tire shops. When consumers don't have as many options to pick from, it eliminates much of the need to have more tire distributor businesses in the state and may result in the closure of countless small and family businesses across the state. This would much more heavily favor larger corporate dealerships and

larger brand name tire distributors who can handle the reduced competitive volume and average sales and losses across more states of this country.

Driving Performance

California has historically been a driving culture state with several driving enthusiast sub communities that are willing to spend to optimize driving performance of their vehicles. This applies to both on road and off-road track use where they want to have the most traction, stability, and braking control in their vehicles. Limiting to OEM tires significantly reduces the available options and can make higher performance vehicles much less safe. The demands on traction and braking performance in higher performance vehicles are much more demanding than what is provided by OEM tires. I can attest to this personally with my 2012 Ford Mustang GT. The OEM tires wore out rather quickly and had fairly poor performance to the Michelin Pilot Sport 4 tires I purchased later. There is also the situation where consumers have purchased after market wheels that change the diameter and rim width of their vehicle setup to further improve tire traction performance. This often may eliminate the OEM tires that came with the original vehicle as tire manufacturers do not carry all sizes of a particular tire compound type. This would economically impact consumers who have after market wheels on their vehicle and prevent them from obtaining the driving experience they are looking for in this great state with a rich driving and car culture.

Thank you for your time listening to these concerns. I hope you take my concerns and others seriously in this matter. Even beyond these practical concerns are the implications of freedom of consumers to choose and balance their needs and purchases around what works best for themselves and their family. There will also be plenty of consumers who do want to optimize for fuel efficiency in their tire purchases, and the lack of a program like this is not stopping them from making that choice. The average Californian does take fuel economy and the environment seriously, but they may not be wanting to change their tire purchasing options for those sake and may have different preferences and concerns with their tire and vehicle performance.

I still love this state and all of the people that live here, but programs like this erode the freedoms I and others enjoy in this great state and may further encourage people to make the challenging decision to leave this state. There are several other issues that add to peoples' reasons to leave and flee to other states, so please do not let tire purchase freedom be yet another slant against this great state and help us keep the driving and car culture this state shaped and improved the rest of this country with.

Concerned Citizen,

Michael Bowling

Opposition to Tire Proposal

From PhotographerChuck [REDACTED]
Date Tue 7/28/2026 5:34 PM
To Energy - TIRES <TIRES@energy.ca.gov>

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Dear Commissioners,

While I understand this rule is well intended, and does include exclusions, and the information you provide is helpful in understanding the intent, I have concerns about this approach to help consumers.

Limiting tire choice, especially for educated consumers, will definitely lead to higher costs. We already see this in other car parts which are specific to California. (Catalytic converters for example.)

I understand there is a need to maintain efficiency with vehicles, but the cost of living in California is already one of the highest in the nation. While you think this will help in reducing costs to consumer in the form of better fuel millage, for those of us that drive below the average millage per year, we will see significantly higher costs. It also limits choices if a consumer wishes for a higher performance than OEM, or a higher load capacity.)

I also fear this will create a situation where people will drive to Nevada or Oregon or Arizona for a lower priced tire. Thus taking away business and tax dollars from California based businesses.

It seems a better approach would be to require tire manufacturers to post or attach information to tires to allow the consumer understand the benefits and drawbacks of a particular product, thus allowing the consumer a choice and eliminating a higher cost to the consumer.

California is already a particularly challenging state to buy property, own a vehicle, save for retirement. The constant, never ending California specific rules that continually increase costs, make it even tougher. (You've already forced us to change to electric heat pumps, at a significant cost for the change over and a ridiculous increase in electricity usage which is more expensive than gas.) Please give us a break with tires.

Thank you for your time, I hope you strongly reconsider this rule, and find an alternative to attain your goal.

Thank you.

Charles Witt