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Comment Received From: Dr. Douglas Sweeney

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Public Comment Opposing Replacement Tire Efficiency Regulations

To the Members of the California Energy Commission,

I am writing to express my strong opposition to the Replacement Tire Efficiency Program regulations. As a rural California resident who relies on performance and off-road-capable tires for daily safety and vehicle utility, I believe these rules prioritize marginal energy savings at the direct expense of driver safety, traction, and real-world tire durability.

1. **Safety Concerns and Traction Trade-Offs:** Tire engineering is a balance of competing trade-offs. Lowering rolling resistance to meet state mandates inherently requires compromises in rubber compounds, tread depth, and carcass rigidity. In rural California—where drivers regularly navigate high-speed two-lane highways, rain-slick mountain passes, debris, and emergency stopping scenarios—wet grip, cornering performance, and short braking distances are critical safety requirements. Sacrificing physical traction for minimal fuel savings places lives at risk.

2. **Incompatibility with Rural Realities and Off-Road Capability:** Rural driving is not limited to smooth urban asphalt. We depend on our vehicles for travel across unpaved roads, rocky trails, mud, and isolated areas with zero cellular service. Standard highway replacement tires designed purely for low rolling resistance lack the puncture-resistant sidewalls, tread aggressiveness, and structural durability required for off-roading and remote driving. While the CEC has established exemptions for specific heavy-duty load indices and deep-tread commercial tires, many daily-driven mid-size truck and SUV All-Terrain (A/T) and Rugged-Terrain (R/T) tires risk being restricted or forced into inferior redesigns. Being stranded in a remote area due to a compromised tire casing is a severe safety hazard.

3. **Financial Burden on Rural Residents:** Restricting 70% or more of current replacement tires from the market will choke supply, limit consumer choice, and inflate prices for compliant sets. Rural residents often drive longer distances out of necessity, not choice. Forcing rural drivers to choose between inadequate low-resistance highway tires or far more expensive heavy-duty alternatives creates an unfair financial penalty on rural working families.

I urge the Commission to halt these restrictions and significantly broaden exemptions for all-terrain, performance, and multi-surface replacement tires to protect the safety and practical needs of rural Californians.

Sincerely,

Douglas Sweeney, PhD
San Diego County, CA