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Request for Specialty-Performance Tire Review and Segment-Specific Cost-Effectiveness Analysis

I am submitting these comments as a professional working in the wheel and automotive specialty-equipment industry.

I support the California Energy Commission's objective of improving replacement-tire efficiency, reducing energy consumption, and providing consumers with better information about tire rolling resistance. I also appreciate that the Commission has already recognized the need for different treatment of several specialty tire categories, including competition tires, limited-production tires, winter tires, large off-road tires, and other specific applications.

My concern is that a regulatory gap remains for street-legal specialty-performance tires that do not meet the narrow definition of a competition tire but are nevertheless engineered for applications materially different from ordinary commuter vehicles.

This segment includes tires used on sports and exotic vehicles, collector vehicles, modified and tuner vehicles, specialty aftermarket builds, high-performance street cars, autocross and HPDE vehicles, and track-capable vehicles that remain registered and operated on public roads.

CEC's own technical analysis recognizes that ultra-high-performance tires are different from ordinary replacement tires. In CEC-600-2026-012, staff reports that the 26 ultra-high-performance tires tested had an average rolling resistance coefficient of approximately 8.8 N/kN, compared with approximately 8.1 N/kN for the 153 other tires tested. Staff specifically states that the different UHP standard is justified by the high levels of traction these tires require. See CEC-600-2026-012, Chapter 7, Figure 3.

The Commission therefore already recognizes that performance tires involve a different engineering balance. These tires may prioritize braking, lateral traction, steering response, high-speed capability, thermal performance, stability, and vehicle-dynamics characteristics in addition to rolling resistance.

I respectfully request that the Commission continue evaluating whether the current ultra-high-performance category and competition-tire exclusion adequately cover legitimate street-legal specialty-performance applications.

A second concern is cost-effectiveness for specialty vehicles with different usage patterns.

CEC-600-2026-012 calculates representative gasoline-vehicle cost-effectiveness using an assumption of 10,413 vehicle miles traveled per year, a gasoline price of \$4.60 per gallon, and a full set of four compliant tires. The report appropriately acknowledges that actual savings vary depending on the specific vehicle and driving behavior.

That distinction is particularly important for specialty vehicles. Sports cars, collector cars, modified vehicles, show vehicles, weekend vehicles, and HPDE or autocross vehicles are often used differently from ordinary commuter transportation.

I am not suggesting that every specialty vehicle is low-mileage. Rather, I am asking the Commission to determine the actual vehicle-miles-traveled profile for this segment

before assuming that the same cost-effectiveness calculation applies equally to it. Because energy and fuel savings from reduced rolling resistance are directly related to miles traveled, a vehicle traveling only a few thousand miles per year can have a substantially different economic benefit than a vehicle traveling more than 10,000 miles annually.

Specialty-market data also show why this segment warrants separate economic consideration.

The 2026 SEMA Market Report, based on 2025 U.S. market data, estimates approximately \$2.91 billion in annual consumer spending on performance and special-purpose tires. It also estimates approximately \$6.80 billion in wheels and tires, including performance/special-purpose tires, off-road/oversize tires, and custom wheels. More broadly, the report identifies wheels, tires, suspension, brakes, and steering as a major component of the specialty-equipment economy.

The report further estimates the U.S. sports-car specialty-equipment segment at approximately \$2.97 billion, with approximately 2.28 million sports cars modified in 2025. Wheels and tires account for approximately 14 percent of spending within that sports-car segment.

These are national figures, not California-specific estimates, and I do not present them as a direct calculation of California economic impact. However, they demonstrate that performance tires and related vehicle modifications support a substantial commercial ecosystem.

That ecosystem includes tire shops, specialty retailers and installers, wheel manufacturers and distributors, alignment and suspension businesses, dealerships, performance shops, vehicle builders, motorsports-related companies, and many other small and medium-sized businesses.

The same SEMA research also demonstrates that enthusiast vehicles have different use patterns from ordinary commuter vehicles. Among accessorized sports cars surveyed, 70 percent were used for pleasure driving, 24 percent for car shows, 18 percent as collector vehicles, and 10 percent for track days. Classic vehicles showed even stronger specialty-use patterns, including 52 percent collector-vehicle use and 41 percent car-show use.

These figures do not themselves establish annual vehicle miles traveled. However, they reinforce the need for the Commission to evaluate specialty vehicles as a distinct use case rather than assuming their usage profile is the same as the general passenger-vehicle fleet.

The potential market impact also deserves closer examination.

In Chapter 10 of CEC-600-2026-012, staff acknowledges that tire retailers are likely to experience increases and decreases in specific tire model lines because some less-efficient models may be dropped and new compliant models introduced.

Staff then concludes that overall tire demand should remain relatively constant because replacement demand is driven by road wear, vehicle miles traveled, and road hazards. However, stable aggregate tire demand does not necessarily mean that specialty consumers will retain adequate product choice.

For a high-volume commuter vehicle, several compliant replacement tires may be readily available. In a specialty application, however, a particular combination of tire size, speed rating, load rating, construction, compound, handling characteristics, or

vehicle fitment may have only a small number of suitable products.

If one or more of those products are discontinued or not offered for sale in California, the effect on that consumer may be disproportionate even though total statewide tire sales remain unchanged.

Reduced availability can also reduce competition within a particular fitment. That may create higher prices, longer lead times, fewer alternatives, or pressure on consumers to select a tire that is less appropriate for the intended vehicle application.

This is also an economic issue for California businesses.

CEC's own report recognizes that California has the highest vehicle registration count in the nation and that manufacturers consider access to the California market important. The report also recognizes that small businesses often have fewer staffing resources, technical capabilities, and financial resources than larger companies.

For that reason, the economic analysis should not stop at determining whether total tire sales remain constant. It should examine whether specialty-product sales, related service work, and aftermarket economic activity could shift or decline because specific performance fitments become unavailable or materially more expensive.

For example, a performance-tire purchase often accompanies or supports other economic activity involving wheels, suspension, alignment, brake upgrades, installation, maintenance, vehicle preparation, and related specialty services. A reduction in appropriate tire availability can therefore have effects beyond the sale of the tire itself.

I respectfully ask the Commission to take the following actions during implementation and future program review:

1. Monitor the number of performance tire models and sizes available in California before and after implementation, rather than relying only on aggregate tire-sales volume.
2. Conduct a segment-specific cost-effectiveness analysis for specialty and performance vehicles using multiple annual-VMT scenarios.
3. Evaluate whether the current ultra-high-performance category and competition-tire exclusion leave a gap for street-legal specialty-performance tires.
4. Work with tire manufacturers, specialty retailers, wheel and tire professionals, vehicle manufacturers, motorsports participants, and the automotive aftermarket to develop objective criteria for any additional specialty-performance category that may be necessary.
5. Monitor product discontinuations, fitment availability, retail pricing, lead times, and impacts on small specialty businesses as the program is implemented.
6. Evaluate California-specific economic effects on the specialty automotive aftermarket, including tire, wheel, suspension, alignment, performance, and installation businesses.
7. Use the Commission's periodic program review process to revise the regulation if implementation data demonstrate disproportionate effects on specialty applications with limited corresponding energy benefit.

I am not asking the Commission to abandon its energy-efficiency objectives. I am asking for a more targeted approach that recognizes different vehicle applications, different real-world usage patterns, and the economic importance of maintaining appropriate product availability.

California can pursue meaningful efficiency improvements while preserving appropriate tire fitment, consumer choice, competition, and a healthy specialty automotive market.

Reference: SEMA, 2026 SEMA Market Report, based on 2025 SEMA U.S. Market Data. The report is proprietary/member-access research and is therefore not attached to this public filing. Supporting data or relevant substantiation can be provided separately if requested and if permitted under applicable distribution rights. Thank you for your consideration.