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Lifecycle Environmental Impacts of Replacement Tire Efficiency Requirements

I am writing regarding the California Energy Commission's proposed requirements for replacement tires.

I understand that the goal of improving tire efficiency is to reduce vehicle energy consumption and associated emissions. However, I am concerned that the environmental analysis may not adequately account for the complete lifecycle of a tire.

A tire that provides lower rolling resistance but requires more frequent replacement may not necessarily result in a net environmental benefit. Manufacturing additional tires requires raw materials, energy, transportation, and industrial processing. Worn tires must then be collected, transported, recycled, repurposed, or disposed of, all of which also have environmental impacts.

I believe the Commission should demonstrate through a complete lifecycle analysis that any reduction in energy consumption achieved through lower rolling resistance exceeds the additional environmental impacts that could result from increased tire production and disposal.

Tire longevity, wet and dry traction, braking performance, vehicle application, load and speed ratings, and consumer safety should remain important considerations. California drivers should not be pushed toward tires based primarily on rolling resistance if doing so results in reduced service life or compromises other important performance characteristics.

I encourage the Commission to publish clear data comparing the total lifecycle environmental impact of compliant replacement tires with the tires currently available to California consumers, including manufacturing emissions, expected tread life, transportation, recycling and disposal.

Improving efficiency is a reasonable objective, but a regulation intended to benefit the environment should be evaluated based on the entire lifecycle of the product, rather than vehicle energy consumption alone.