

DOCKETED

Docket Number:	20-TIRE-01
Project Title:	Tire Efficiency Order Instituting Information Proceeding
TN #:	259571
Document Title:	Kendrick Mensink Comments - Items for EIR to investigate
Description:	N/A
Filer:	System
Organization:	Kendrick Mensink
Submitter Role:	Public Agency
Submission Date:	10/16/2024 5:12:08 PM
Docketed Date:	10/17/2024

*Comment Received From: Kendrick Mensink
Submitted On: 10/16/2024
Docket Number: 20-TIRE-01*

Items for EIR to investigate

Additional submitted attachment is included below.

I would advise the EIR to investigate

1) Direct impacts.

Consumer market will generally optimize towards lowest tire cost per mile. The tradeoffs of safety via reduced tire grip and of waste via wear particulate and bulk used tire life/mileage should be studied and quantified. California Air Resources Board has studies in-process to help inform these tradeoffs, see [Brake & Tire Wear Emissions | California Air Resources Board](#). This government program should raise the efficiency threshold without compromising safety and minimizing waste. Consult with existing tire testing servicers to determine the environmental costs to tire manufacturers to implement their own testing. Perhaps tire manufacturers will use 3rd party testing servicers, and perhaps this should be a requirement to help ensure fairness, similar testing conditions, and reduce falsified tire ratings submitted to CEC efficiency database. Wear-rates for low rolling resistance tires should have metrics too. Wholistic tire efficiency must include the mileage life of a tire (bulk waste) as well as particulate wear waste. It wouldn't necessarily net benefit the state to have more fuel-efficient tires if tire-slip related accidents increase significantly and/or if used tire waste is generated at a significantly higher rate.

2) Indirect Impacts.

There may be a significant inventory of unsold replacement tires that will not meet the minimum efficiency requirements. Will a "black market" develop temporarily or permanently for subpar replacement tires and should that be explicitly prevented?

3) Alternatives Analysis.

The SWOT environmental impact comparison analysis of a state-managed tire testing facility/agency vs free market vs state-designated testing facilities that meet ISO and state testing requirements.