



June 12, 2026

The Honorable Gavin Newsom
Governor of California
1021 O St. Ste. 9000
Sacramento, California 95814

Re: Replacement Tire Efficiency Program – Legislative Concerns Regarding Statutory Compliance Creating Cost of Living Impacts

Dear Governor Newsom:

We write as Members of the California State Legislature to express serious concerns regarding the California Energy Commission's (CEC) proposed Replacement Tire Efficiency Program. While we support the State's long-standing commitment to improving energy efficiency and reducing emissions, we are equally responsible for ensuring that regulatory actions remain consistent with legislative intent and carefully consider impacts on California consumers and businesses.

The program derives its authority from Assembly Bill 844 (Nation, 2003), which established a clear statutory framework governing any replacement tire efficiency standards.¹ That framework reflects a deliberate balance: advancing efficiency while ensuring that such standards are technically feasible, cost-effective, and do not adversely affect safety, tire life, or the State's management of scrap tires.² These considerations were expressly incorporated into the statutory framework adopted by the Legislature.

Based on the current proposal, we have concerns regarding whether this balance has been adequately achieved. For these reasons below, we respectfully urge the Administration **to delay implementation** of the Replacement Tire Efficiency Program as currently proposed and direct CEC to reevaluate the proposal to ensure full compliance with statutory requirements and alignment with the statutory framework and broader economic considerations.

First, the proposal raises substantial issues regarding cost-effectiveness. Our constituents continue to face significant affordability challenges across many sectors of the economy, including transportation-related costs. Replacement tires are not discretionary purchases;

¹ Pub. Res. Code, §§ 25770–25773

² Pub. Res. Code, § 25773(a)(1)(A)–(D)

they are required for safe vehicle operation. Because replacement tires are essential for safe vehicle operation, any regulatory framework affecting product availability or pricing warrants careful evaluation. The statute requires that standards be cost-effective in practice, not solely in modeled projections.³

Recent national polling further confirms the extent of public concern regarding government mandates that increase replacement tire costs. In a 2026 nationwide survey commissioned by the Specialty Equipment Market Association (SEMA), recent polling indicates many consumers remain sensitive to policies that could materially increase replacement tire costs or reduce available product options.⁴ These findings are consistent with what many of us continue to hear from constituents throughout California: affordability and consumer choice remain primary concerns as families face rising costs across nearly every sector of the economy.

Second, the proposal raises unresolved questions regarding technical feasibility. The Legislature required that any standards be achievable across the relevant market.⁵ Given the diversity of tire categories, vehicle types, and performance requirements, questions remain regarding how the proposed regulatory thresholds may affect product availability across different vehicle classes and performance categories.

Third, we are concerned about potential downstream impacts that may be inconsistent with statutory guardrails. The Legislature explicitly directed that standards must not adversely affect tire life or the State's efforts to manage scrap tires.⁶ To the extent the proposal creates incentives that could shorten product lifespan or increase replacement frequency, it may create outcomes that are difficult to reconcile with these statutory objectives.

More broadly, this proposal reflects a growing concern we hear from our constituents across the state: that regulatory decisions can have cumulative economic impacts that should be carefully considered alongside environmental and efficiency objectives. Whether in housing, energy, transportation, or basic consumer goods, regulatory decisions have real and immediate consequences. As policymakers, we have an obligation to ensure that new regulatory programs do not further compound these pressures without clear, demonstrated, and balanced benefits.

We believe a more balanced approach (i.e. enhanced consumer information, transparency, and voluntary market-driven improvements) would better align with legislative intent while minimizing unintended impacts on consumers and small

³ Id., § 25773(a)(1)(A)

⁴ Survey commissioned by the Specialty Equipment Market Association (SEMA) and conducted by occam™ by AlphaROC between April 6–7, 2026, surveying 1,207 respondents nationwide with a reported margin of error of +/- 2.8%. The survey found that 79.5% of respondents were concerned about government requirements increasing replacement tire costs and 68.9% preferred consumer choice over uniform government standards.

⁵ Id.

⁶ Id. § 25773(a)(1)(C)–(D)

businesses. This approach would advance efficiency goals without imposing rigid mandates that will have foreseeable economic consequences.⁷

We believe additional consumer education and transparency measures should be evaluated alongside any regulatory proposal.

Thank you for your attention to this matter.

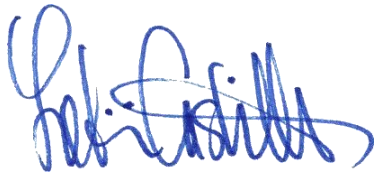
Respectfully,



Lori D. Wilson
Assemblywoman, 11th District



Dave Cortese
Senator, 15th District



Leticia Castillo
Assemblymember, 58th District



Heather Hadwick
Assemblymember, 1st District



Anamarie Ávila Farías
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Assemblymember, 39th District



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Assemblymember, 36th District



Blanca E. Rubio
Assemblywoman, 48th District

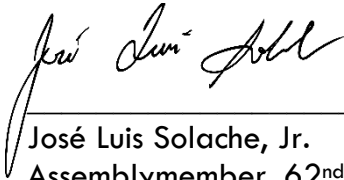
⁷ Id. § 25771(b)-(c)



Michelle Rodriguez
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Senator, 6th District



José Luis Solache, Jr.
Assemblymember, 62nd District



Rosilicie Ochoa Bogh
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cc:

Wade Crowfoot, Secretary for Natural Resources, State of California

David Hochschild, Chair, California Energy Commission

Nancy Skinner, Commissioner, California Energy Commission