

November 21, 2016

Rajinder Sahota
Assistant Division Chief
Industrial Strategies Division
California Air Resources Board
Sacramento, CA

Subject: 2030 Scoping Plan Development and GHG Emissions Target

Dear Ms. Sahota:

Thank you for the opportunity to provide comments in response to the Public Workshop on the 2030 Target Scoping Plan Update. Energy Solutions is a professional and engineering services firm whose mission is to create large-scale environmental impacts by providing market-based, cost-effective energy, carbon, and water management solutions to our utility, government and commercial customers. We strongly support ARB's innovative and critical work to reduce greenhouse gas (GHG) emissions.

We recommend explicitly including the benefits of fuel efficient passenger vehicle replacement tires in ARB's policy scenarios, emissions calculations, and economic modeling. Currently, replacement tires are substantially less efficient than tires on new vehicles and would undermine a significant portion of the expected emissions and economic benefits of GHG standards for passenger vehicle as they age and are equipped with replacement tires. Fortunately, ARB has found that "fuel efficient passenger vehicle tires can be utilized by both new and in-use vehicles in the near-term to achieve GHG emission reductions. Deployment of fuel efficient vehicle tires for in-use vehicles could include limited incentives, followed by ratings and then standard setting to permanently shift the market" (May 2014 AB32 Scoping Plan Update).

A 10% improvement in replacement tire efficiency will reduce GHG by 2.7 million metric tons and save consumers \$882 million annually according to the [California Energy Commission](#). A [study](#) for the South Coast Air Quality Management District demonstrates that 20% or greater improvement is feasible and will especially benefit air quality in disadvantaged communities where used vehicles operating on replacement tires are more common. We also [estimate](#) that the average driver will save up to \$1000 in fuel costs.

We appreciate your consideration of our comments. Please feel free to contact me or have your staff contact me at epike@energy-solution.com or (510) 482-4420 x 239 if you wish to discuss our comments.

Sincerely,



Ed Pike, P.E.
Senior Engineer