

**Vehicle Weight Safety Study Task Force Supplementary Comments (Optional)**

***In lieu of this form, comments may be submitted on letterhead with the subject line “Vehicle Weight Safety Study Task Force Supplementary Comments”***

Task Force Organization:	_____ Alliance for Automotive Innovation _____
Submitted by:	_____ Paul Scullion _____
Date:	_____ 11/25/2025 _____

**Comments:**

*Slide 42 – The main question is whether a weight-based fee will produce any meaningful safety improvements, since the fee, once paid, would not directly address risky driving behavior (e.g., speeding).*

See: <https://www.iihs.org/research-areas/pedestrians-and-bicyclists#vehicle-speeds>

## Vehicle Weight Safety Study Task Force Supplementary Comments (Optional)

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Task Force Organization:	American Automobile Association (AAA)
Submitted by:	Megan McKernan and Stephen Finnegan
Date:	11/21/25

### **Comments:**

Based on the data presented to this task force, it is clear that the weight of passenger vehicles, including SUVs and pickups, has minimal if any increased impact to road degradation compared to smaller, lighter vehicles. Therefore, a weight-based fee or tax for purposes of road repair is not justified or appropriate.

The focus, and end result, of the Task Force's work, and resulting recommendations developed by the CTC, should be to improve traffic safety, especially for vulnerable road users, including pedestrians and bicyclists.

To achieve that goal, recommendations need to be both politically and otherwise viable AND actually result in improvements to traffic safety outcomes.

A large time-of-purchase fee is not viable and would have uncertain safety results. An annual fee is more viable, but will not have direct safety benefits, through vehicle purchase and driver behavior changes. Instead, it would merely become a new revenue source. The amount of money that would need to be charged in any fee or tax on larger/heavier vehicles to change consumer purchasing and vehicle use behavior would be both unreasonable and unrealistic. Further, motorists may be forced to keep their older, less reliable, less fuel-efficient and potentially less safe vehicles longer. In addition, new vehicle purchase choices become more limited for lower-income people.

Electrified vehicles are inherently heavier; therefore, a weight-based fee contradicts the push for electrification. If instead, EVs were exempt from weight-based fees as the vehicle fleet becomes more electrified the fees or taxes become less relevant.

Much of the discussion revolved around safety of those outside the vehicle. We would ask that the safety of vehicle passengers be considered as well. Larger, heavier vehicles are often inherently safer for passengers inside of the vehicle. Vehicle passengers represent the largest share of traffic fatalities.

The implementation of one-time weight-based fees would likely have some effect on consumer purchase decisions. As a result, automakers may face the decision to somehow make vehicles lighter. Many current materials that accomplish this, such as carbon fiber, are more expensive materials and therefore would not be viable when

trying to reduce weight and keep vehicle purchase prices down. In the effort to reduce weight, vehicles could potentially be less safe for passengers in a crash depending on materials used.

Annual fees are much less likely to impact consumer purchase or other decisions and behaviors. Although an annual charge would create a new revenue source that could be used for safety improvements, any increase in transportation and traffic safety taxes, fees, and revenues should be undertaken as part of a broader analysis of transportation and traffic safety funding needs, including a review of how existing resources are spent, if the reallocation of existing resources could result in similar safety benefits, the relative level of transportation taxes, fees, and revenues in California compared to other states, and the impact a tax or fee increases would have on California motorists, especially lower income households.

November 25, 2025

California Transportation Commission  
1120 N Street, MS 52  
Sacramento, California 95814

**RE: Vehicle Weight Safety Study Task Force Supplementary Comments**

Dear Task Force Commission Members:

The California New Car Dealers Association (CNCDA) is a statewide trade association representing the interests of nearly 1,300 franchised new car and truck dealer members. CNCDA members primarily engage in the sale and lease of new and used motor vehicles and provide customers with parts, service, and automotive repair.

CNCDA appreciates the opportunity to provide comments on the Draft Summary of Vehicle Weight Safety Study Task Force Findings. While we commend the efforts to address the complex relationship between vehicle weight and road safety, we have several concerns. First, fee-based approaches risk pricing many Californians out of purchasing newer, cleaner, and safer vehicles, which could undermine the state's environmental and safety goals, and raises significant equity concerns. Additionally, we believe the Vehicle Weight Safety Study (Study) fails to establish causation between vehicle weight and increased injury, severity of injury, and fatalities of vulnerable road users and thus any policy decisions made, or rules promulgated on this basis are misguided. Finally, the initial task set forth in [AB 251 \(2023\)](#) erroneously leaves out commercial vehicles ubiquitous on our city and neighborhood streets.

**Risks of Fee-Based Approaches**

As vehicle affordability is approaching a breaking point, the Study's modeling of fee-based approaches raises significant concerns for all Californians.

**1. One-Time Vehicle Weight Fee for New Passenger Vehicles**

The most concerning of the fee-based approaches, the proposed one-time vehicle weight fee for new passenger vehicles above 3,800lbs, set between 0% and 20% of the purchase price, would significantly increase the upfront cost of heavier vehicles. For example, a family purchasing a \$45,000 midsize SUV that weighs 4,500lbs could face a fee of up to \$9,000, raising the effective purchase price to \$54,000. These increased upfront costs would disproportionately affect:

- Families that rely on three-row SUVs for child seating and cargo space.
- Individuals with disabilities who require larger vehicles capable of accommodating lifts, wheelchairs, or adaptive equipment.

- Professionals such as contractors, landscapers, or agricultural workers who require trucks capable of towing or hauling equipment.

As we saw in real time during the pandemic, increased new vehicle prices would likely push many consumers into the used market, causing a significant increase in demand for used vehicles. Considering a modest used-vehicle price increase of 5-15% due to this increased demand, California could see the following effect:

- A used 2023 SUV could be pushed from the current average of \$30,000 to nearly \$35,000,
- Monthly payments could increase by as much as \$100, and
- Inventory access for low- and middle-income buyers could significantly shrink.

## **2. Annual Vehicle Weight Fee for Registered Passenger Vehicles**

The proposed annual fee of \$0.10 per pound for vehicles above 3,800lbs would add a recurring cost to ownership. A typical pickup weighing 5,000lbs would incur a yearly fee of around \$120, totaling \$1,200 over 10 years. For families on fixed incomes, this is equivalent to adding an extra two to three monthly payments over the life of ownership.

These recurring costs may discourage consumers from upgrading to newer vehicles. Again, California has watched this happen in real-time, with its vehicle fleet projected to hit a record 12.8 years old by the end of 2025. Imposition of yet another government fee to vehicle ownership could increase the fleet age even further. In California, this would:

- Slow turnover of the vehicle fleet,
- Increase the average age of vehicles on the road, and
- Delay adoption of modern safety features such as automatic emergency braking, lane-keeping assist, pedestrian detection, and improved crashworthiness.

The fee would also unintentionally discourage the adoption of cleaner technology. Electric vehicles (EVs) and plug-in hybrids typically weigh 500–1,500lbs more than their gasoline equivalents due to battery packs. A popular EV weighing 4,800lbs would face an annual fee of \$100 more than a comparable gasoline sedan. This runs counter to California's climate goals and could reduce adoption of EVs among even more affluent households, not to mention stifle adoption of this technology in urban neighborhoods that could benefit most from it.

To counter the potential effects on EV adoption with a fee-based approach, the Task Force considers a fee exemption based on “fuel type.” However, this seems completely counter to the purpose and scope because, as mentioned above, EVs are heavier than their internal combustion engine counterparts.

## **3. Weight-Based Parking Fees**

Weight-based parking fees would further increase the cost of owning larger vehicles, especially in urban areas already burdened with high parking costs. A \$2–\$4/day weight surcharge in city garages could mean an extra \$40–\$80/month for commuters or families living in multi-unit housing. This could disproportionately affect:

- Parents who rely on larger vehicles for children, strollers, and car seats,
- Caregivers who transport mobility equipment or medical devices, and
- Rural residents who must drive larger vehicles when accessing city centers for medical or government services.

### **Lack of Causation Between Vehicle Weight and Safety Outcomes**

The Task Force acknowledges the Study shows only correlation, not causation, between vehicle weight and increased injury severity or fatalities for vulnerable road users. Many things can correlate simply because of coincidence, underlying factors, or shared trends – but only causation can justify policy decisions or regulations. The inability to isolate vehicle weight from other contributing factors – such as speed, curb height, and other vehicle features – limits the reliability of the findings. Without clear causation, policy recommendations based on weight alone are misguided.

Further, larger, commercial vehicles (e.g., delivery trucks such as operated by Amazon, UPS, FedEx, etc.) were not considered in the Study, which seems to run counter to the overall goal of vulnerable road user safety, given their weight – particularly the huge fleet of large electric delivery vans and trucks.

All this points to the fact that the safety outcomes of vulnerable road users are attributed to factors that extend well beyond vehicle weight alone, including, vehicle size, speed, driver attentiveness, road design, etc.. More research needs to be done on the actual cause(s) of the increase in vulnerable road user injury, severity of injury, and fatalities before policy changes or rule promulgation can confidently commence.

### **Next Steps**

CNCDA again applauds the efforts made to ensure a safer environment for vulnerable road users but is categorically opposed to any approach that would inflate an already critical vehicle affordability climate, especially here, where causation has not been established and commercial vehicles ubiquitous on California streets have not been factored into the equation in a meaningful way.

CNCDA asks that the Commission consider the following as it finalizes its report to the Legislature:

- Consider alternatives to fee-based structures – Avoid pricing consumers out of access to cleaner, safer vehicles. Fee-based approaches will render results that run counter not only to the purposes of this Study, but also to California’s broader climate goals. As an alternative to a fee-based approach, consider an incentive to owning a lighter vehicle such as reduced licensing fees or an HOV access sticker.
- Factor more into the equation – Rather than focusing on weight alone, the Commission should take other broader safety measures under advisement. Improved road design, stricter traffic enforcement, and enhanced driver education, among others must be a part of the equation.
- Evaluate the potential of built environments – The Study highlights the effectiveness of built environments providing more protection for vulnerable road users. Increased roadway lighting, crosswalk enhancements, traffic calming measures, and separated bicyclist and pedestrian infrastructure seem to produce the best outcomes for vulnerable road users. A further study into potential approaches to solve any barriers to more built environments seems more apt to produce positive results for vulnerable road users than a singular focus on vehicle weight.

- Conduct further research generally – additional studies are needed to establish causation between vehicle weight and safety outcomes, as well as to assess the long-term impacts of fee-based policies on consumer behavior and equity.
- Include commercial vehicles – these vehicles are prevalent on city and neighborhood streets and should be factored in when evaluating weight and vehicle design related to vulnerable road user safety.

Again, CNCDA appreciates the opportunity to have been able to participate in this workgroup and to provide feedback and industry perspective. We look forward to continued collaboration to ensure that California's transportation policies promote safety, equity, and environmental sustainability.

Sincerely,

A handwritten signature in black ink, appearing to read 'Les Swizer', with a stylized, sweeping flourish extending to the right.

Les Swizer

Legal & Regulatory Affairs Counsel

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Task Force Organization:	Farm Bureau
Submitted by:	Steven Fenaroli
Date:	11.25.25

### Comments:

Cayla did a nice job of scheduling the meetings and making the topics relevant and thought out. Matt's assertions were backed up by fact and research while other presenters' claims were not supported by data.

It still remains clear that there is no tie between vehicle weight and increased collisions.

It also remains clear that because there is no link, this is not a fee and is instead a tax.

California continues to lead the nation in cost of living and then after the state passes increased fees or taxes, or other ideas which will raise the cost of a vehicle, we look astounded as to how on earth the state could further become expensive. California ought to consider the average citizen who is making \$41,000 and ask – "Can they afford another \$5,000 on a the price of a vehicle?"

All of these costs continue to increase and it hurts one group of residents the most – the lowest income.



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Task Force Organization: Safe Streets Research & Consulting, LLC

Submitted by: Rebecca Sanders

Date: November 25, 2025

### **Comments:**

I am grateful to the Task Force and the research team for their work on this topic. Below, I reiterate my points that the research is actually quite clear that larger vehicles, the size of which is significantly positively associated with weight, have been demonstrated to be a threat to safety on our roadways. This threat comes in multiple forms:

1. While it is not 100% clear that these larger vehicles are, all things equal, more likely to be involved in a crash than a smaller vehicle, they are increasingly likely to be involved simply by comprising an ever larger percentage of the vehicle fleet. Thus, whatever other factors are involved in crashes, whether distraction, impairment, speed, or others, there is increasing likelihood that those factors occur when someone is driving a larger vehicle given trends in fleet composition.
2. IIHS research has shown that when someone is involved in a crash with a larger vehicle, they are significantly more likely to be severely injured. This is particularly true for pedestrians, bicyclists, and motorcyclists, but drivers and passengers of smaller cars are also at increased risk due to the size differential.
3. Research from the Oregon DOT using DMV data to create a detailed database of vehicle characteristics has found that vehicle weight is significantly associated with pedestrian injury risk – separate from body type. This research was rigorous and has generalizable conclusions, giving us confidence that the weight fee could help both mitigate injury risk over time and invest in environmental mitigation via safety improvements.

I know that there are many aspects to consider in this work and appreciate the dedication to create a safer, more just California.

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Task Force Organization:	Streets For All
Submitted by:	Marc Vukceвич, Director of State Policy
Date:	21 November 2025

### Comments:

Thank you for the opportunity to provide supplementary comments on the AB 251 Vehicle Weight Task Force.

California is facing both a cost-of-living crisis and a transportation system in which most residents still depend on automobiles. Any policy solution must therefore balance consumer affordability with the state’s broader safety, climate, and equity goals. While current research does not conclusively prove that vehicle weight *alone* causes more crashes or injuries, weight is strongly correlated with the characteristics that make vehicles more dangerous to everyone outside them—larger frontal profiles, higher hoods, greater stiffness, reduced visibility, and longer stopping distances. These vehicle design trends, not weight in isolation, are contributing to the alarming rise in pedestrian and cyclist fatalities and according to research presented to the task force are not being mitigated by new in-vehicle technologies despite those technologies’ noble goals.

For these reasons, I encourage the task force to recommend a **two-tiered vehicle weight fee system** that treats internal-combustion vehicles (ICEs) and electric vehicles (EVs) differently. EVs are heavier for reasons linked to electrification, a transition California must continue to accelerate. Yet the safety risks that come with high-weight, high-front-end vehicles should still be addressed.

A two-tiered structure could:

- Impose a modest point-of-purchase fee on heavier ICE and EV models, scaled appropriately to reflect their different technological baselines.
- Pair these fees with **rebates for lighter vehicles** that deliver the same basic utility as a car—including ICE and EV sedans, with EV sedans receiving the greater incentive.
- Extend incentives to low-weight zero-emission modes such as **e-bikes, electric mopeds, electric motorcycles/emotos**, which provide affordable mobility while reducing road danger, emissions, and congestion.

This approach would give consumers meaningful choices while avoiding punitive impacts on those who must own cars, especially in communities with limited transit access. It also recognizes that unless California intervenes, the market will continue the “arms race” toward ever-larger, heavier vehicles. As each household buys a bigger vehicle to feel safe next to everyone else’s, road danger increases for pedestrians, cyclists, and other vulnerable road users—producing a vicious cycle with devastating consequences.

By incentivizing lighter, safer vehicle designs and supporting the transition to EVs and micromobility, California can improve safety, affordability, and sustainability at the same time.

Thank you for considering these comments.