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November 30, 2022

Robin Lang
Chief, Emissions Certification and Compliance Division
4001 Iowa Ave
Riverside, CA 92507

Subject: Draft Aftermarket Procedure Revision to include EV Conversion Kits

Dear Ms. Lang,

The Specialty Equipment Market Association (SEMA) welcomes this opportunity to comment on the recently proposed modifications to the Procedures for Exemption of Add-On and Modified Part(s) for On-Road Vehicles/Engines to include EV Conversion Kits.

SEMA represents the \$45 billion specialty automotive industry. The trade association is comprised of over 7,500 mostly small businesses nationwide that manufacture, distribute, and retail specialty parts and accessories for motor vehicles. The industry employs over 1 million Americans and produces performance, functional, restoration and styling-enhancement products for use on passenger cars, trucks and special interest collector vehicles.

Each November SEMA hosts a trade show that brings our industry together and is a good indicator of trends and interests in the automotive aftermarket. The 2022 SEMA Show included a large space dedicated to battery electric vehicles with 37 vehicles on display, both new and converted. It was clear that automotive enthusiasts are embracing the benefits of EVs. This includes a number of small businesses that are interested in developing and selling EV conversion kits.

SEMA is supportive of the effort to update the Procedures to include EV conversion kits. In general, the proposed modifications seem appropriately basic for kits that align with California's goal of reducing pollution by minimizing emissions from mobile sources.

Procedure Specific Comments

Upon review of the proposed Procedure revision, SEMA respectfully offers the following comments:

- **Vehicle Coverage-** The requirements for presenting vehicle coverage are unclear. Section III XI(b)(1)(B) states that an application must contain "Vehicle coverage. Specify vehicles or

engines that the manufacturer is including in the application to be covered by the Executive Order.” Section III XI(b)(2)(A) further states that applications must be prepared and organized according to five available weight classification categories. EV conversion kits are likely to be designed to work in a variety of vehicles. Is there an expectation that a manufacturer will identify a specific range of vehicles that their product will be applicable to, or is it only necessary to identify one or more of the five categories that the product will be applicable to?

- **Existing Emissions Equipment-** Use of an EV conversion kit, by definition will eliminate the gasoline-, diesel- or alternative-fueled engine from the vehicle and will render emissions devices unnecessary and therefore ineffective. Section III XI (f) states that the Executive Officer will make a determination that the conversion kit will not “reduce the effectiveness of the emissions control system...”. This section further discusses the vehicle meeting applicable emissions standards which become irrelevant when an EV conversion is done. These statements are unnecessary and misleading. They appear to be a carryover from language copied from section IX of the current Procedures. SEMA proposes striking a portion of the text such that it reads, *“If the Executive Officer determines that the EV conversion kit will not reduce the effectiveness of the emissions control system, will not result in emissions that exceed the applicable model year standards or comparative baseline levels for the vehicles and/or engines listed in the application, and that it meets all the requirements set forth in these procedures...”*.

SEMA thanks CARB for considering these comments along with the consideration of comments submitted by our members, who are effectively the true “parties of interest” in these procedures. The Aftermarket Parts Executive Order program is vital to our industry’s ability to do business both in California and nationwide, and including EV conversions will help encourage car enthusiasts to embrace EV technology.

If you have any questions about the comments, please feel free to contact me at petert@sema.org or (909) 978-6673.

Sincerely,



Peter Treydte
Director of Emissions Compliance, SEMA

Cc: Annette Hebert, Deputy Executive Director
Shawn Daley

Hopkins, Chris@ARB

From: ARB Clerk of the Board
Sent: Thursday, March 23, 2023 11:13 AM
To: Hopkins, Chris@ARB
Cc: Kersnar, Evan@ARB
Subject: FW: Comment Letter
Attachments: 2022.12.01 EV Comments Letter-FINAL.pdf

Chris, see below and attached for posting.

Katie Estabrook

Manager
Board Administration & Regulatory Coordination Unit
Executive Office
[she/her/hers](#)
VoIP: 279-208-7745

From: Kersnar, Evan@ARB <Evan.Kersnar@arb.ca.gov>
Sent: Thursday, March 23, 2023 11:04 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Cc: Estabrook, Katie@ARB <katie.estabrook@arb.ca.gov>; Garcia, Lindsay@ARB <Lindsay.Garcia@arb.ca.gov>; Harrington, Kristine@ARB <Kristine.Harrington@arb.ca.gov>; Moore, John@ARB <John.Moore@arb.ca.gov>
Subject: FW: Comment Letter

See the attached.



Evan Kersnar
(He/Him/His)
Board Member Liaison
Office of the Chair
California Air Resources Board
(916) 327-6247
Evan.Kersnar@arb.ca.gov

From: Davina Hurt <davinahurtforcarb@gmail.com>
Sent: Thursday, March 23, 2023 10:55 AM
To: Kersnar, Evan@ARB <Evan.Kersnar@arb.ca.gov>
Cc: Board Assistant <carb.bod.assistant@gmail.com>
Subject: Fwd: Comment Letter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Evan ,

Can you place this letter I received into the record for item resolution 23-11?

Kind regards,
Davina

----- Forwarded message -----

From: **Matt Robinson** <Matt@syaspartners.com>
Date: Thu, Mar 23, 2023 at 8:48 AM
Subject: Fwd: Comment Letter
To: davinahurtforcarb@gmail.com <davinahurtforcarb@gmail.com>

SEMA Letter

Thanks, Matt

Please excuse any typos.

From: Peter Treydte <petert@sema.org>
Sent: Wednesday, March 22, 2023 10:11:08 PM
To: Matt Robinson <matt@syaspartners.com>; Luis Morales <luism@sema.org>
Subject: Comment Letter

Matt and Luis,

As discussed, here is the comment letter that we submitted regarding the EV Conversion Kit regulations. We can discuss more tomorrow.

Peter Treydte

Director of Emissions Compliance

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