



November 29, 2021

TO: California Air Resources Board
FROM: Sam Humphrey, President Mi-T-M
Re: Comments with respect to the “Public Hearing to Consider Proposed Amendments to the Small Off Road Engine Regulations: Transition to Zero Emissions”

Dear Sir or Madam,

Mi-T-M is one of the largest and oldest manufacturers of industrial pressure washers, air compressors and generators in North America. We produce over 600 units a day and serve the domestic and international markets. The state of California is a very important market segment of our business. We manufacture product for several Californian markets including Rental, Equipment, Paint, Hardware, Dealers, Distributors, Agricultural, OEM and Government. Mi-T-M also manufactures product under a private label brand exclusively for STIHL, John Deere, Sherwin-Williams, Grainger and 35 other well-known and respected Californian companies.

Our engineering team has been working diligently on a battery bank option however, the industrial segment does not have the same requirements as the residential. The technology to power industrial equipment is not yet available. If the zero emission CARB standard passes without an available battery bank resource for the industrial market, a huge void will be created and several businesses that rely on the California industrial market will be left with no available business option.

PERFORMANCE UNDER PRESSURE.®

I respectfully request the California Air Resources Board members to reconsider the timeline of their Transition to Zero Emissions until the technology for a viable battery bank can be developed and tested. This standard cannot meet the necessary requirements for powering industrial equipment at this time.

Sincerely,

Sam Humphrey
President