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November 29, 2021

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: One Size Fits All Amendments to SORE Regulations Misses Mark

Dear Chairwoman Randolph,

Please consider our following comments regarding the Proposed Amendments to the Small Off-Road Engine (SORE) Regulations that the Board will vote on at its December 9th meeting:

Summary: Our business is a family-owned sheet metal fabrication company in Upland, California. We have been in business over 20 years and employ more than 60 highly skilled craftspeople who build a variety of products used by other companies throughout North America in the products that they manufacture. For a large group of these customers we manufacture custom-built fuel and evaporative emission control systems that they incorporate into the purposeful SORE powered agricultural, construction, recreational and commercial equipment that they manufacture.

The December 9th, 2021, board agenda item to “Consider Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero-Emission” as presented by CARB staff is overly general and does NOT accurately characterize all the SORE equipment that falls under the SORE regulations (see BACKGROUND below for more explanation).

If these amendments are approved as proposed the direct impact to our company would be a minimum 30% loss in revenue and the elimination of at least 20 manufacturing jobs. Our customers will also experience similar losses in revenue and jobs related to the effective ban that the proposed amendments will cause for the SORE powered equipment they manufacture.

Request: Considering this we request that the amendments to the SORE regulations be changed so that certain SORE equipment, that does not have either an existing zero-emission replacement or does not have replacement technology that could be feasibly and cost effectively developed, can be sold in California while its replacement zero-emission technology is developed.

Background: Our company, ECI Fuel Systems, manufactures fuel and evaporative emission systems for customers that build specialty equipment representing less than 1% of California's SORE inventory. This equipment is significantly different in many ways from the consumer-oriented equipment that accounts for the other 99% of the SORE population. Our customers incorporate our fuel systems into a variety of specialized equipment like:

- Large fans and blowers used in agriculture,
- Permanently fixed mounted backup generators often found on recreational vehicles,
- Industrial high-pressure washers and sewer cleaners,
- Commercial carpet cleaners, etc.

Compared to consumer oriented SORE equipment the major differences of these specialty devices are that they are:

- more often used in **remote** locations without access to grid electrical power,
- expected to **operate for multiple** weeks between refueling,
- used with **larger** engines and fuel tanks (30-40 gallons),
- refueled much **less** frequently due to their larger fuel tanks
- refueled at commercial gas stations rather than from portable fuel containers
- **NOT** portable

For certain SORE equipment, the concept of a “transition to zero-emissions” might be realistic. For example, some devices may already have equivalent, existing, zero-emission equipment (ZEE) capable of replacing them. For other devices where ZEE replacements may not yet be available it might be conceivable that replacement ZEE could be developed for them in the timeframe proposed by the amendments. However, considering the specialty equipment that we and our customers manufacture, the proposed amendments are completely ignorant of the small but important group of SORE powered equipment that has no existing equivalent ZEE to replace it and has no feasible or cost-effective replacement technology on the foreseeable horizon.

Without provisions in the proposed amendments to allow any transition of these devices to zero emissions, they will simply be banned and the work that this equipment does at best will be much harder to do and at worst go undone. Additionally, because of the small amount of these pieces of equipment being manufactured the R&D of replacement technology (smaller, lighter, more energy dense batteries, fuel cells, ???) will have to wait for development by other larger industries (probably automotive) and then adapted to these specialty pieces of equipment.

Collective hard work is how emissions from SORE (small off-road engines) have been reduced to the point that SORE powered equipment is now 80% cleaner than it was before these efforts began. This effort involved industry continually migrating solutions usually developed for other internal combustion engine categories (ie: automobiles) to SORE equipment allowing them to meet the ever-increasing emissions standards being established. Rather than banning certain SORE equipment this history should be continued as there are still additional reductions in emissions from these specialty SORE devices that can be regulated while its replacement technology is developed.

Please contact me with any questions you may have at (909) 732-5773 or by email at gregmitchell@ecifuelssystems.com.

Sincerely,



Greg Mitchell
General Manager
ECI Fuel Systems

cc:

Board Member John R. Balmes, MD
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Board Member John Eisenhut
Board Member Nathan Fletcher
Board Member Dean Florez
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