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Dear California Air Resources Board:

Thank you, California Air Resources Board. I am R. Calvin Rasmussen; I am the CEO of Royce Industries L.C. with operations in Nevada, Idaho, Utah, and Colorado with plans of expanding brick and mortar operations into California. We started our company 38 years ago as a Contract Cleaner, in other words we would take our industrial pressure washers to wherever the work was, including very remote locations that most times require the use of 25HP and less engines.

We are very interested in Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions since it potentially has a devastating impact on businesses just like ours. We strongly believe that "as goes California so goes the Country". I have more detailed comments found within the "Board Meeting Comments Log", Comment #516. I appreciate the opportunity to further comment here today.

On page 44 of Proposed Amendments ISOR, it is acknowledged there are no battery powered pressure washers for professional use. It is also acknowledged that 67% of residential pressure washers are already Zero Emission Equipment aka. ZEE. The Cleaning Equipment Trade Association comments can be referred to for additional details for why ZEE is not suitable for the commercial, industrial, professional use segment. Those can be found within the "Board Meeting Comments Log", Comment #483.

Today my Company distributes Industrial Pressure Washers to the private sector as well as local, county, state, and federal agencies. These agencies use Industrial Pressure Washers to CLEAN, DISINFECT and SANITIZE everything from Homeless Encampments to Playground Equipment, from Graffiti Removal to Disaster Clean-Up Sites. Although there are numerous other critical applications for Industrial Pressure Washers, with the short time I have left let me please emphasize one. Aquatic Invasive Species. Specifically, Zebra & Quagga Mussels. All California Lakes, Rivers, Streams and Aquifers are at risk of mussel infestations. As a result, many California agencies such as The Los Angeles Department of Water & Power are required to use portable trailer mounted Industrial Pressure Washers located at remote boat launch ramps and other inspection sites to aid in the Watercraft Inspection and Decontamination process which has been required by California State Law† with the goal of preventing the spread of these invasive species.

I respectfully ask the Board to refer the Proposed Amendments back to staff to read "Cleaners: High pressure" back to the Pre-Emption list and specifying high pressure washers in this definition to continue the societal benefit the state of California receives from this industry.

Thank you very much for your time and consideration.

†<https://wildlife.ca.gov/Conservation/Invasives/Regulations>

Respectfully Submitted,

R Calvin Rasmussen
Chief Executive Officer