

**WRITTEN COMMENTS OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE CALIFORNIA AIR RESOURCES BOARD'S PROPOSAL CONCERNING
AMENDMENTS TO CALIFORNIA'S SMALL OFF-ROAD ENGINE AND TIER 4
COMPRESSION-IGNITION ENGINE REGULATIONS AND TEST PROCEDURES;
AND AMENDMENTS TO THE EXHAUST EMISSION CERTIFICATION TEST FUEL
FOR OFF-ROAD SPARK-IGNITION ENGINES, EQUIPMENT, AND VEHICLES**

December 14, 2011

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in support of the proposed amendments to California's small off-road engines and Tier 4 compression-ignition engine regulations and test procedures and amendments to the exhaust emission certification test fuel for off-road spark-ignition engines, equipment, and vehicles. We commend ARB for its proposal to harmonize its SORE and Tier 4 off-road CI engine test procedures with those of U.S. EPA as well as amend exhaust emission certification test fuel requirements used by California's off-road SI, gasoline-fueled categories, including LSI engines, SORE, recreational marine engines, and off-highway recreational vehicles.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. MECA member companies have over 35 years of experience and a proven track record in developing and commercializing exhaust emission control technologies for a wide range of new original equipment and in-use on-road and off-road vehicles and engines of all sizes.

MECA agrees with ARB staff's proposal to enhance alignment of both the SORE and Tier 4 off-road CI engine regulations with federal versions to make certification compliance less burdensome for the off-road engine and equipment manufacturers. The proposed amendments provides necessary changes to avoid imposing either duplicate California vs. federal certification testing or forcing manufacturers to produce separate California and 49-state engine families without adversely affecting the stringency or the emission benefits of the existing regulation. As noted in Staff Report, the proposed changes would result in a more efficient certification process for engine and equipment manufacturers. Without the proposed emission test requirements, it may become increasingly impractical for manufacturers, private testing facilities, and ARB to perform exhaust emission tests using the current test procedures. Additionally, without the alignment, manufacturers could be forced to meet additional requirements and/or certify separate engine families in California at considerable extra cost without a corresponding increase in emission benefit.

MECA also supports ARB staff's proposal to modify the exhaust emission certification test fuel requirement used by California's off-road spark-ignition, gasoline-fueled categories including large spark-ignition engines, SORE, recreational marine engines, and off-highway recreational vehicles. The proposed amendment will allow off-road SI, gasoline fueled engine manufacturers the option of using the new California 10% ethanol-blend gasoline (E10) certification test fuel, which ARB plans to adopt for 2015 and subsequent model on-road motor

vehicles, for 2013 through 2018 model year engines. MECA believes that maintaining the current test fuel consistency between on-road motor vehicles and most of the off-road categories and establishing a complete consistency between the off-road categories' certification and commercially available fuels are important. This new test fuel option would provide manufacturers flexibility in deciding when to switch over to certifying engines using an E10 test fuel. As stated in the Staff Report, the proposed test fuel amendment is appropriate because the 2007 Phase 3 California Reformulated Gasoline (CaRFG3) amendments essentially required that the only commercially available gasoline allowed to be produced and dispensed in California on and after December 31, 2009 must have 10% ethanol as the oxygenate.

In closing, we commend ARB for proposing to align the California SORE and Tier 4 off-road CI engine regulations and test procedures to improve efficiency of the emission certification process. We also supports ARB's proposal to maintain the current consistency between California's on- and off-road categories' certification test fuels and the commercial gasoline sold in California.

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