**Air Resources Board**

**Agenda Item 11-10-4**

**Amendments to Test Procedures and Certification Fuel for SORE Category**

**December 16, 2011 Board Hearing**

**Comments Submitted by Outdoor Power Equipment Institute**

The Outdoor Power Equipment Institute (OPEI) represents the manufacturers of lawn, garden, forestry and utility products such as chainsaws, walk-behind mowers, and utility vehicles. OPEI also represents the manufacturers of small off-road engines (SORE) that are used to power these products.

These engines (as well as the related exhaust and evaporative emission control systems) are subject to ARB’s SORE regulations as well as U.S. EPA’s corresponding regulations. For the last 15 years, OPEI has worked proactively with ARB and U.S. EPA to generally harmonize emission regulations and test procedures to try and facilitate the efficient production and certification of 50 state products. Such harmonization benefits ARB and EPA, manufacturers, and consumers.

OPEI fully supports the proposal to the Board from ARB staff to adopt amendments that will promote further harmonization with the corresponding EPA standards and test procedures – including the transition to 10% ethanol (E-10) as an exhaust-certification test fuel (provided such fuel is fully harmonized with EPA under this evolving process). OPEI agrees with ARB staff

that the fuels used for both certification and compliance testing need to reflect the fuels (like E-10) that are now predominantly used in the marketplace.

Because there will likely be minor differences with the ARB and EPA certifications programs on certain issues (such as the technical specifications for E-10 certification fuel), OPEI urges ARB to continue to provide manufacturers with the flexibility to submit emission test data to ARB based on EPA certification fuels and “equivalent” EPA test procedures. OPEI also urges ARB, as well as EPA, to continue to work closely together and harmonize minor differences in their programs to ensure manufacturers can submit one set of emission-test data to both Agencies. OPEI will continue to work constructively with ARB staff and other stakeholders on making minor technical clarifications and improvements to the final regulatory package and Staff Report. Please call us with any questions.

Respectfully,

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