

Form Letter 1 for Comment 1 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.

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Subject: Request for an EO for aftermarket exhaust on 20+ year old car

Comment:

****Subject:**** Request for Assistance in Obtaining CARB Executive Order for Aftermarket Part for 2004-2005 Mazdaspeed MX-5 Miata

I am writing as a constituent and as someone seeking your assistance in obtaining a California Air Resources Board (CARB) Executive Order (EO) for an aftermarket part designed specifically for the 2004-2005 Mazdaspeed MX-5 Miata. As you may know, CARB requires an EO to certify that add-on or modified parts do not increase vehicle emissions. However, the process to obtain this exemption presents unique challenges for vehicles with low production numbers--fewer than 6,000 units of this model were sold in North America and they are all 20+ years old now. The part in question is a downpipe and catalytic converter, SKU# 06-58300, produced by Flyin' Miata, a highly respected manufacturer and retailer of quality aftermarket components. The catalytic converter meets California emissions standards and will pass the sniffer test. Flyin' Miata is well known for their commitment to engineering excellence and emissions compliance, yet the complexity, cost, and delays of the CARB approval process make it extremely difficult for them to justify pursuing certification for niche vehicles like the Mazdaspeed MX-5. While I fully support California's efforts to reduce vehicle emissions, the current EO process is unnecessarily burdensome for small manufacturers and enthusiasts trying to bring compliant parts to market. The extensive testing requirements, high costs, and bureaucratic roadblocks discourage compliance and push people toward off-the-books modifications or simply abandoning efforts altogether. This kind of government inefficiency is exactly why voters become frustrated with the system, leading to electoral outcomes like Donald Trump's victories. People want practical governance, not red tape that makes life harder for those who are trying to follow the rules. I respectfully request your help in addressing these issues:

1. ****Advocacy for Streamlined Processes:**** Encourage CARB to develop alternative approval pathways for low-production vehicles, such as reduced testing requirements or lower fees.
2. ****Support for Small Manufacturers:**** Promote initiatives that provide financial or technical assistance for small businesses seeking EO certification.
3. ****Policy Development:**** Support legislative or regulatory reforms that account for the challenges of certifying parts for low-production vehicles without compromising environmental goals.

I appreciate your time and your service to our community. Your leadership is crucial in ensuring that California's regulatory framework remains fair, practical, and accessible to businesses and consumers alike. Please let me know how I can assist in advancing this discussion.

Sincerely,

Alex Pimentel

2005 Mazdaspeed Miata Owner

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Attachment:

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