April 8, 2021

Chris Burford
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95814

Dear Mr. Burford:

On behalf of the Tree Care Industry Association (TCIA), I write in response to the California Air Resources Board's (CARB) Public Workshop to Discuss Potential Changes to the Small Off-Road Engines (SORE) Regulations.

TCIA represents approximately 2,300 businesses engaged in commercial arboriculture (tree care) in the United States, with 250 members located in California. TCIA's members employ more than 150,000 people, or nearly seventy-five percent of all tree care workers in the country. TCIA works to elevate the standards of commercial and utility tree care by developing safety and education programs, standards of tree care practices, and management information for tree and landscape firms around the world. We also provide continuing education, training, conferences, and publications to promote safe and appropriate practices of tree care.

TCIA joins with other related industry associations in expressing our concerns with the proposed changes to the CARB SORE regulations, which include accelerated timelines that would set SORE product exhaust and evaporative emission limits to zero starting with Model Year (MY) 2024 products. TCIA member companies would be significantly impacted by these regulations as they pertain to chainsaws with displacement of less than 45cc, which our members often use for in-tree operations. TCIA is specifically concerned that, if the proposal shifts tree care equipment manufacturers and businesses away from gas-powered equipment like the in-tree chainsaws in the proposed truncated timeframe, manufacturers will not be able to develop new zero-emission equipment (ZEE) in an efficient, cost-effective manner, which will translate to higher costs tree care businesses who rely on such products. This will particularly negatively impact smaller tree care businesses, which are less able to absorb increased costs. According to the Small Business Administration, 90% of the tree care industry is considered "small business", and over 80% of the firms in our industry employ 10 people or fewer.

While the CARB proposal currently allows manufacturers to use emissions credits generated prior to MY 2024 to continue producing gas-powered equipment past MY 2024, they currently have limited opportunities to generate such credits needed to allow them to do so, effectively creating a ban on most SORE gas-powered equipment starting with MY 2024. This means that manufacturers will have to shift to produce zero-emission outdoor power equipment by 2024. This rapid transition will impose cost burdens on manufacturers and these costs will necessarily be shared with the tree care businesses that purchase and use their products. If manufacturers are provided additional time to transition, however, they will be better positioned to meet demand, build efficiencies into production, and keep costs down.

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One other consideration is the ongoing costs of operating ZEE equipment, including the costs of batteries and chargers needed for a full day of work, which can easily surpass the cost of gas needed for gas-powered equipment. Again, the truncated timelines proposed would exacerbate battery and charging equipment shortages and costs. The lower productivity and higher costs will be two burdens for both manufacturers and tree care businesses because of the CARB's proposal to accelerate the timeline of ZEE use in California.

TCIA does recognize and support the opportunities to study SORE equipment emissions reductions, but we believe the current CARB SORE proposals with its truncated timelines will harm our industry by decreasing manufacturing and productivity and increasing costs. We hope that CARB will engage with our industry's stakeholders to redevelop an emission reduction strategy that allows continued production and sales of gas-powered SORE equipment in California until we can resolve the anticipated challenges described in this letter.

Sincerely,

David White, President and CEO, TCIA