



April 7, 2021

California Air Resources Board
Attn. Christopher Burford, P.E. & Dorothy Fibiger, Ph.D.
1001 I Street
Sacramento, CA. 95814

Regarding: Changes to CARB's small off-road engine (SORE) exhaust and evaporative emission regulations

Dear Mr. Burford and Dr. Fibiger,

The California Alliance for Golf (CAG) is incorporated under the Laws of the State of California for the purpose of congealing the state's normative golf organizations/associations/businesses into one organization that can credibly purport to speak on behalf of the \$13.3 billion California golf industry. The comments that follow are submitted in accordance with the Alliance's procedures for taking positions on proposed legislation and regulation.

#

Please accept the below comments on the proposed changes to CARB's small off-road engine (SORE) exhaust and evaporative emission regulations that may include tighter criteria for air pollutant emission standards and a transition of the SORE category to zero-emission equipment to achieve additional criteria air pollutant emission reductions, addition of a zero-emission generator credit program, improvements to the test procedures to prevent fuel spillage and leakage, and repeal of the variance provision.

With rare exceptions for manufacturers with compliance offset credits, the proposed changes to CARB's SORE regulations will put an end to the manufacturing of many popular gas-powered product types (max 25 hp) starting with equipment model year 2024.

Some of these products used on golf courses include chainsaws (<45cc), handheld grass and hedge trimmers, handheld and backpack leaf blowers, handheld pole pruners, handheld and ground supported edger's, walk behind and riding greens mowers, select fairway mowers, verticutting and aerator units, pressure washers and snow blowers.

While the golf industry understands CARB's concerns about pollution, noise, and dust control, the newly proposed regulations will place unreasonable burdens on golf courses as well as other related green industries. Current zero-emissions equipment has not been widely adopted for high-use needs, such as those of golf course superintendents and other professional landscapers.

The previously mentioned gas products are vital tools in maintaining golf courses, giving workers the ability to get jobs completed efficiently and effectively while maintaining the agronomic standards that golfers are accustomed to. Gas powered handheld tools and mowers may not be required for small landscapes, but they are essential to the operation of golf facilities that often exceed 130 acres in size.

While battery powered products have improved greatly over the last decade and have been implemented (and will continue to be) at many golf facilities both in California and across the country, some of the products face runtime issues which can hinder productivity on large landscapes.

Battery powered equipment has a finite amount of power to complete a task. Some routine maintenance procedures on golf courses including verticutting and aerification cannot be performed properly using this equipment as the draw on the batteries is too great. Superintendents and other landscape professionals need the ability to work all day without frequent battery recharges.

Additionally, many of the battery powered products needed to maintain a golf facility are still in their infant stages and the availability of some of these products is limited.

The golf industry sees the benefit of moving to lines of electric equipment in the future. Reduced noise, reduced maintenance costs, reduced fuel and the softening of our environmental footprints are beneficial to our operations. However, CARB's proposed timeframe for moving to zero-emission equipment is too rapid.

Manufacturers need additional time to enhance zero-emission equipment, produce additional products and realize the full potential of lithium-ion battery technology. Golf facilities and other green industries need additional time to continue implementing this new technology, replace existing fleets in a fiscally responsible manner and have the benefit of access to a greater range of battery powered alternatives.

The California Alliance for Golf requests that CARB engage industry to develop an emission reduction strategy that allow the continued sales of SORE equipment in California until manufacturing, performance, economic and recycling challenges of lower-emission alternatives are resolved.

Sincerely,

Jim Ferrin
President, California Alliance for Golf