

Form Letter 1 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Matthew

Last Name: Meyers

Email Address: mattlandscapes@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 07:46:44

Form Letter 2 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Denise

Last Name: Fitzgerald

Email Address: denise@landesign-inc.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 07:53:24

Form Letter 3 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: JJ

Last Name: Fitzgerald

Email Address: jj@landesign-inc.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 07:55:06

Form Letter 4 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tyler

Last Name: Stocking

Email Address: tstocking@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 07:58:01

Form Letter 5 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Robert

Last Name: Johnson

Email Address: rob@vdvlandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 07:58:55

Form Letter 6 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Peter

Last Name: Estournes

Email Address: pje@gardenworks-inc.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:31:38

Form Letter 7 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Gino

Last Name: Borello

Email Address: g.borello@newpathlandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:34:54

Form Letter 8 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Brittani

Last Name: Davis

Email Address: bdavis@ranchomesa.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:38:42

Form Letter 9 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tyler

Last Name: Rogers

Email Address: tcr288@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:43:52

Form Letter 10 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: ALEX

Last Name: CAMARENA

Email Address: alexc@rdolandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:45:37

Form Letter 11 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jose

Last Name: Alfaro

Email Address: joe@excellandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:48:31

Form Letter 12 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: ALBERTANO

Last Name: CARDENAS

Email Address: tanoc@rdolandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:51:37

Form Letter 13 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jasmine

Last Name: Pawlik

Email Address: jazmineangelique@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:52:41

Form Letter 14 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: EDGAR

Last Name: CARDENAS

Email Address: edgarc@rdolandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:02:54

Form Letter 15 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Andrea

Last Name: Osorio

Email Address: dredre1.ao@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:26:34

Form Letter 16 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Patrick

Last Name: Migliorini

Email Address: patrick@americangardens.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:00:55

Form Letter 17 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Alicia

Last Name: Ramirez

Email Address: aliciaramirez27@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:15:42

Form Letter 18 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: John

Last Name: Ramirez

Email Address: jramirezevo@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:17:07

Form Letter 19 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tris

Last Name: Jauch

Email Address: tjauch@cglmgt.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:36:52

Form Letter 20 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Dee

Last Name: Thom

Email Address: deeanne@landesign-inc.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:56:42

Form Letter 21 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: David

Last Name: Kisst

Email Address: pkisst@aol.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:04:55

Form Letter 22 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Bill

Last Name: King

Email Address: billking@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:09:56

Form Letter 23 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Bill

Last Name: King

Email Address: billking@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:10:15

Form Letter 24 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Thomas

Last Name: Heaviland

Email Address: tjheaviland@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:54:05

Form Letter 25 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Julio

Last Name: Lopez

Email Address: jlopez@cadrelandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:55:11

Form Letter 26 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Michelle

Last Name: Andre

Email Address: michelle@andrelandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:03:50

Form Letter 27 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Efia

Last Name: Sullivan

Email Address: jerfia@bellsouth.net

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:09:31

Form Letter 28 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Eric

Last Name: Caballero

Email Address: eric.caballero@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:12:58

Form Letter 29 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tom

Last Name: Eccles

Email Address: tom@buccolandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:13:52

Form Letter 30 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Mark

Last Name: Whiting

Email Address: jeepstudusa11@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:15:34

Form Letter 31 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Sierra

Last Name: brady

Email Address: sierrabee03@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:17:20

Form Letter 32 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Evann

Last Name: Zilka

Email Address: evannzilka@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:17:29

Form Letter 33 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Nathan

Last Name: Jaramillo

Email Address: nate.jaramillo@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and our majority small business demographic. This further highlight how a delayed

transition for commercial grade equipment will make this transition easier and less costly for all those involved. In conclusion, the landscape industry cares deeply for the environment. We genuinely want to support a transition to ZEE, and we believe that time is coming but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:17:43

Form Letter 34 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Eric

Last Name: Davis

Email Address: emdavis99@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden hobbyist . Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:17:33

Form Letter 35 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Rodolfo

Last Name: Valdez

Email Address: rudyva.92@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:18:50

Form Letter 36 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Kenneth

Last Name: Allen

Email Address: keyslost@aol.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:23:39

Form Letter 37 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jerry

Last Name: Tenret

Email Address: jerry.tenret@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:26:17

Form Letter 38 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Alicia

Last Name: Estrella

Email Address: aliciae373@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:27:36

Form Letter 39 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Darrin

Last Name: Mingus

Email Address: bonnets.hack-0s@icloud.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:29:32

Form Letter 40 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Gregory

Last Name: Iacock

Email Address: jilllao463@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:31:21

Form Letter 41 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: James

Last Name: Drabos

Email Address: mrbytchen@aol.com

Affiliation:

Subject: Deadline extension of small off-road transition to zero emission

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nation's green spaces, and we share Governor Newsom and other California policymakers' desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use - it does not perform as well; the repair and maintenance infrastructure are not there; California's energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations - at a significant cost. Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:28:48

Form Letter 42 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Ricardo

Last Name: Arriola

Email Address: rarriola50@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:33:07

Form Letter 43 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tommy

Last Name: bokelman

Email Address: tommybokelman@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:34:02

Form Letter 44 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: MaryLou

Last Name: Quayle

Email Address: jmg912@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and our majority small business demographic. This further highlight how a delayed

transition for commercial grade equipment will make this transition easier and less costly for all those involved. In conclusion, the landscape industry cares deeply for the environment. We genuinely want to support a transition to ZEE, and we believe that time is coming but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:34:47

Form Letter 45 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tanesha

Last Name: Winningham

Email Address: tjwinningham@att.net

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

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transition for commercial grade equipment will make this transition easier and less costly for all those involved. In conclusion, the landscape industry cares deeply for the environment. We genuinely want to support a transition to ZEE, and we believe that time is coming but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:36:33

Form Letter 46 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Roberto

Last Name: Franco

Email Address: cplfranco@comcast.net

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a concerned citizen. Landscape professionals work every day to take care of our nations green spaces, and they share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

They support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. Landscape professionals understand and acknowledge that the power of the purse is vested in the California Legislature, but they must highlight how concerned they are as an industry that their voices are not being heard.

While they appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate. Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and the majority small business demographic. This further

highlight how a delayed transition for commercial grade equipment will make this transition easier and less costly for all those involved.

In conclusion, the landscape industry cares deeply for the environment. They genuinely want to support a transition to ZEE, and believe that time is coming but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:37:49

Form Letter 47 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Joyce

Last Name: Schoenhoeft

Email Address: cleo1961@sbcglobal.net

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:39:00

Form Letter 48 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Raul

Last Name: Bernal

Email Address: rbernalr@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:39:49

Form Letter 49 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Eric

Last Name: Carmona

Email Address: carmona0608@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:42:56

Form Letter 50 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Harold

Last Name: Bravo

Email Address: bravosan@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:42:56

Form Letter 51 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Tyme

Last Name: Flatt

Email Address: tfruscella@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today because I am concerned about our landscape and garden professionals. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost. Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:43:09

Form Letter 52 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Philip

Last Name: Bates

Email Address: philipabates@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:44:54

Form Letter 53 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Sierra

Last Name: brady

Email Address: sierrabee03@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:48:39

Form Letter 54 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: John

Last Name: tpsyrnoski

Email Address: sfskeel@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:50:02

Form Letter 55 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Saul

Last Name: David

Email Address: flatsaul@aol.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:51:39

Form Letter 56 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jason

Last Name: Higgins

Email Address: jayatstater@msn.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:56:40

Form Letter 57 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Joseph

Last Name: DeMotto

Email Address: ragman518@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:00:30

Form Letter 58 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: David

Last Name: Willi

Email Address: christinedband@aol.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:03:46

Form Letter 59 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Rebecca

Last Name: Quiroz

Email Address: babydoll.006@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:06:16

Form Letter 60 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Sierra

Last Name: brady

Email Address: sierrabee03@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:16:00

Form Letter 61 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Michelle

Last Name: kunert

Email Address: michelsmac@surewest.net

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:22:29

Form Letter 62 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jim

Last Name: Vienneau

Email Address: jimv@oclm.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:22:39

Form Letter 63 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Brett

Last Name: McCormick

Email Address: brettmccormick74@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:35:25

Form Letter 64 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Sierra

Last Name: brady

Email Address: sierrabee03@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:41:39

Form Letter 65 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jon

Last Name: Louis

Email Address: jlouis3880@aol.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:01:54

Form Letter 66 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: jorge

Last Name: sanchez

Email Address: elpancho_08@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:11:43

Form Letter 67 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Raul

Last Name: morales

Email Address: redbarnlandscape@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:33:39

Form Letter 68 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Dee

Last Name: Conese

Email Address: dconese@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:00:14

Form Letter 69 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: George

Last Name: Bushala

Email Address: george@bushalabrothers.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:38:29

Form Letter 70 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Christine

Last Name: Rice

Email Address: christineshatas@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:36:57

Form Letter 71 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Ulisses

Last Name: Banuelos

Email Address: gpltasks@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:53:26

Form Letter 72 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Dustin

Last Name: White

Email Address: dustinbowker55@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 05:23:02

Form Letter 73 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Corin

Last Name: Bemus

Email Address: corin.bemus@bemus.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 05:32:29

Form Letter 74 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jon

Last Name: Cancel

Email Address: jcancel@oclm.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 06:17:27

Form Letter 75 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Darren

Last Name: Payne

Email Address: darren@oclm.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 09:13:44

Form Letter 76 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jay

Last Name: Tripathi

Email Address: jay@gardenworks-inc.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 11:33:37

Form Letter 77 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Andrew

Last Name: Balogh

Email Address: andrewbalogh@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 12:27:13

Form Letter 78 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: jay

Last Name: mcmullen

Email Address: mcmullen139@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Please I have one more concern.
I understand there may be new rules for the emissions for my boat. I have a 1975 Sea Ray that I have restored during this COVID time. I do not use it every day. Maybe a dozen times a year. The boat is well maintained and I am hoping to use this boat to time with my family.
I feel that some day I would like to upgrade to a newer boat but for now I would like to use it and enjoy it. I also feel that it contributes so little to our air that when in the ocean it is it would be hard to measure the effects.
Thank you,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 12:42:09

Form Letter 79 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Keith

Last Name: Ritter

Email Address: kdrjr1013@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 14:23:03

Form Letter 80 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Ruth

Last Name: Aldridge

Email Address: seaviewbks@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 18:57:27

Form Letter 81 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Juvenal

Last Name: plancarte

Email Address: david.aronlandscaping@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 21:24:53

Form Letter 82 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Paul

Last Name: Fraynd

Email Address: paul@sunvalleyomaha.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 10:58:22

Form Letter 83 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Blake

Last Name: Goodfellow

Email Address: blakegoodfellow@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 11:26:52

Form Letter 84 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Matt

Last Name: Winter

Email Address: matt@mwlawn.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 12:24:27

Form Letter 85 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Andrew

Last Name: Bray

Email Address: candrewbray@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 13:08:10

Form Letter 86 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Ken

Last Name: Geer

Email Address: geer_ken@hotmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you as an Engineer. a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost. Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years. We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond. Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate. Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and our majority small business demographic. This further highlight how a delayed transition for commercial grade equipment will make this transition easier and less costly for all those involved. In conclusion, the landscape industry cares deeply for the environment. We genuinely want to support a transition to ZEE, and

we believe that time is coming but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 18:36:16

Form Letter 87 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Chuck

Last Name: Monico

Email Address: cmonico1@cmsoutdoor.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 08:46:59

Form Letter 88 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Mark

Last Name: Daily

Email Address: moonlighter1@aol.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 12:20:45

Form Letter 89 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Chris

Last Name: Andersen

Email Address: chris@suncolawns.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 06:35:06

Form Letter 90 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: HARUMI

Last Name: ISHIMARU-GACHINA

Email Address: hjgachina@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and our majority small business demographic. This further highlight how a delayed

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 11:11:17

Form Letter 91 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Daniel

Last Name: Kapler

Email Address: dankapler@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for most commercial users and at this time is not technically feasible. Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. The battery powered commercial-grade equipment on the market today is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. The repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

And to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and our majority small business demographic. This further highlight how a delayed transition for commercial grade equipment will make this transition easier and less costly for all those involved.

In conclusion, the landscape industry cares deeply for the environment. We genuinely want to support a transition to ZEE, and

we believe that time is coming -- but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 11:21:19

Form Letter 92 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Ivan

Last Name: Ramos

Email Address: iramos@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 11:22:13

Form Letter 93 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Patrick

Last Name: Bobias

Email Address: pbobias@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 11:23:53

Form Letter 94 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Dominic

Last Name: Gachina

Email Address: dgachina@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 12:11:31

Form Letter 95 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Marino

Last Name: Avila

Email Address: mavila@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 12:27:01

Form Letter 96 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Adan

Last Name: Leon

Email Address: aleon@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 12:40:48

Form Letter 97 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Fidencio

Last Name: Hernandez

Email Address: fhernandez@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 12:53:05

Form Letter 98 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: William

Last Name: Cruz

Email Address: wcruz@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 12:59:23

Form Letter 99 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Omar

Last Name: Carrillo

Email Address: ocarrillo@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 14:22:17

Form Letter 100 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Damian

Last Name: Echeverria

Email Address: decheverria@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 15:03:59

Form Letter 101 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Edwin

Last Name: Palomino

Email Address: epalomino@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 15:08:05

Form Letter 102 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Delane

Last Name: Vergara

Email Address: dvergara@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 07:14:08

Form Letter 103 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Ramon

Last Name: Salgado

Email Address: rsalgado@slmlandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 08:12:47

Form Letter 104 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Joshua

Last Name: Emeterio

Email Address: joshuae@slmlandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 08:18:12

Form Letter 105 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Lauren

Last Name: Emeterio

Email Address: lorandandrew207@yahoo.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 08:19:35

Form Letter 106 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: EDWARD

Last Name: SHINEN

Email Address: edward@shinenlandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 09:59:58

Form Letter 107 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: James

Last Name: Habeger

Email Address: jim@pacificvistlandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 11:02:36

Form Letter 108 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Mike

Last Name: Hagemeyer

Email Address: mike@pacificvistalandscape.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional. Landscape professionals work every day to take care of our nations green spaces, and we share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible. However, a two-year timeline is simply too fast a transition for commercial users and at this time is not technically feasible. The battery powered commercial-grade equipment on the market today is not yet ready for high-volume use it does not perform as well; the repair and maintenance infrastructure are not there; Californias energy grid may not be able to handle the increased loads, and industry companies would have to rewire and retrofit their buildings to add additional powerlines and charging stations at a significant cost.

Battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, but the equipment is not ready for high-volume professional use. It is less powerful, does not work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment. In California there are 55,000 landscape companies and 99% of them are small businesses. Many are minority owned and are not prepared to make this transition in only 2 years.

We support a responsible transition to zero emission equipment when the equipment is ready. However, currently, commercial battery-powered equipment has performance issues, cost issues, and infrastructure issues. According to its own data, the California Air Resource Board can allow a much longer timeline for commercial landscape companies to make the transition to battery equipment and still meet its emission goals without placing a financial burden on the 50,000 small landscape businesses in California. Because of this please delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

Lastly, to assist a transition to ZEE there must be a robust rebate and tax incentive program put into place. We understand and acknowledge that the power of the purse is vested in the California Legislature, but we must highlight how concerned we are as an industry that our voices are not being heard. While we appreciate that the California Legislature approved \$30 million to support AB 1346 and this transition, that amount is woefully inadequate.

Based on the CSUF data published in CARBs ruling, if ALL that money went to ONLY commercial business (1,911,555) that would mean that only \$15 dollars would be provided per piece of equipment traded in. We are talking about investing 10s to 100s of thousands of dollars for each company to transition and \$15 does not come close to supporting the landscape industry and our majority small business demographic. This further highlight how a delayed

transition for commercial grade equipment will make this transition easier and less costly for all those involved. In conclusion, the landscape industry cares deeply for the environment. We genuinely want to support a transition to ZEE, and we believe that time is coming but not by 2024 for a complete transition. The landscape industry relies on this equipment to support their employees, customers and families and their concerns must be considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 14:01:11

Form Letter 109 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Cesar

Last Name: Munguia

Email Address: cmunguia@gachina.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 06:43:01

Form Letter 110 for Comment 125 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.

First Name: Jack

Last Name: Rush

Email Address: jack@oclm.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 07:34:05