November 4, 2021

To: California Air Quality Board

 From: Sierra Motor Sports, northern CA power equipment (small engine) dealer, Grass Valley, CA

Re: Hearing on December 9, 2021 on SORE regulations

Dear Board,

**First**: In the rural areas of our state, fire prevention/mitigation is a year round job that requires the use of many tools. Mostly clearing brush, grasses, dead trees and dead or low-hanging limbs is imperative and also required by county ordinances). ZEE equipment is appropriate on a small lot. I personally have adopted use of ZEE equipment in my yard, unless a large tree falls unexpectedly. As a business we encourage consumers to switch to ZEE equipment when feasible.

However, managing fire prevention on large parcels usually requires SORE equipment. Sometimes you can only work for 30 minutes at a time and it is very expensive, and cumbersome (if not impossible) to buy multiple extra batteries and have them charged, and carried out with you. Also, the overall life of these batteries makes this equipment not cost-effective. In addition, there are many instances where a ZEE equipment cannot even complete the task. Imagine a large oak tree falling and needing to be removed so there is not dead, dry fuel. This is mandated by most counties and Cal-Fire.

Also, the fire agencies utilize gas-powered water pumps. The city and county agencies utilize gas-powered water pumps manage heavy water flows and construction projects. Our local police departments and Search and Rescue have all purchased gas powered generators from our store for situations they could not manage any other way.

 **Second**: Disposing of batteries has become a challenge to our business and homeowners alike. I have currently been waiting a month (and still not been cleared) to be allowed by our local Transfer Station to have an appointment to dispose of lithium batteries. I am also very concerned where all of these batteries are ultimately landing. They are not recyclable. Are they being stacked on vacant land in Nevada with all of the worn out electric vehicles?

**Third**: 2024 is too soon to eliminate the sale of gas powered generators. Besides PSPS, the power goes out frequently in rural areas. Winter storms, dead trees or limbs falling on lines any time of year, and many other issues often caused unplanned outages. Many households have medical needs, and cannot be without power due to oxygen, or medications needed to be kept cool etc. etc.

I strongly urge the Board to extend the time frame on the generator portion of this regulation until there are other solutions. Also, it is imperative to extend the time frame on the other regulations even longer due to fire concerns. According to CARB, wildfires emitted more than 100 million metric tons of CO2 last year. Let’s not set ourselves up for even larger and worse fires in the future causing loss of property and life.

Also, the board seems to have forgotten that trees produce oxygen and clean carbon dioxide out of the air we breathe. Without trees, life could not continue. Trees have also proved to remove airborne particles from the air and reduce smog, thereby improving the air we breathe, and therefore, our respiratory health. Please consider this in your decisions.

Susan Johnson

Business Owner and California native