



November 22, 2021

California Air Resources Board  
1001 I Street  
Sacramento, CA. 95814

Regarding: Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions

Dear California Air Resources Control Board,

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

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**Please accept the below comments on the proposed amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions.**

The California golf industry is an end user of many products that will be affected by the proposed changes to CARB’s SORE regulations. Some of these products used on golf courses include chainsaws (<45cc), handheld grass and hedge trimmers, handheld and backpack leaf blowers, handheld pole pruners, handheld and ground supported edger’s, walk behind and riding greens mowers, select fairway mowers, generators, verti-cutting and aerator units, pressure washers and snow blowers.

The California Alliance for Golf supports CARB’s efforts to develop an emission reduction strategy to reduce pollution and noise in the state. As a commercial user, we recognize that the green industry will continue to move to lines of zero emission equipment in the future and that these lines offer numerous benefits, including healthier working environments, lower maintenance costs, reduced noise, reduced environmental impacts and reduced fuel costs.

However, we are concerned that the current inability to mass produce zero emission equipment that meets commercial use standards by January 1, 2024, will hinder golf courses and other large green industries’ ability to conduct operations that meet the expectations of end users and customers.

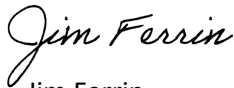
While some pieces of zero emission equipment may meet commercial needs by January of 2024, numerous others may not; they will require considerable additional technological tweaking before they

are likely to meet the “fit for intended use” standard. The current zero emission equipment available to commercial users poses infrastructure and cost/performance issues, including limited battery life, charging challenges, durability/shelf-life problems, lack of maintenance support, and incapacity to complete large golf course maintenance and landscape tasks.

Additionally, as acquisition of zero emission equipment will be of higher initial expense to end users (realized savings will come in future years), we believe that the \$30 million allocated for procurement of this equipment needs to be increased to meet what will be great demand from the green industry in California. Based on the CSUF study on SORE (if the entire amount went to commercial rebate), this would only amount to \$15 per piece of equipment transitioned/traded out.

In closing, the California Alliance for Golf requests that CARB consider the above-mentioned factors and works with manufacturers, green associations, and retailers to maintain the 2024 end of sale date for zero emission residential SORE but consider extending the time period to transition to zero emission “commercial/professional grade” equipment beyond 2024 to the degree to which fears about the commercial unavailability of equipment fit for intended use are borne out. Based on Alternative 2 in the ISOR document released Oct. 12, 2021 (with a phase out of all equipment no later than 2026 with the exception of generators), the above request would still allow the state to meet its targeted 2016 State SIP Strategy expected emission reductions for SORE while allowing industry further time to enhance and implement zero emission equipment suitable for commercial purposes.

Sincerely,



Jim Ferrin  
President, California Alliance for Golf