



American Rental Association

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ARARental.org

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Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Members of the California Air Resources Board:

Attached are the comments of the American Rental Association regarding the proposed amendments to the Small Off-Road Engine Regulations.

Respectfully submitted,

A handwritten signature in black ink that reads "John W. McClelland". The signature is written in a cursive, flowing style.

John W. McClelland Ph.D.



**Comments by the American Rental Association
California Air Resources Board (ARB)
Small Off-Road Engines (SORE)
November 29, 2021**

Background:

The American Rental Association (ARA) represents 354 member companies operating 900 locations in California. ARA members rent equipment to businesses as well as consumers. A significant proportion of equipment covered by the proposed SORE rule is rented to commercial entities engaged in activities that include, but are not limited to, landscaping and yard care, tree services, clearing rights-of-way, construction site preparation and maintaining industrial sites. Many ARA-member companies are small independent businesses that buy, maintain, and rent SORE equipment in locations throughout the state. Many already have battery-powered electric equipment in their inventory. ARB is proposing to require all SORE units, with the exception of generators, sold in California in model year (MY) 2024 and beyond be zero emission units.

As with other ARB regulations aimed at reducing air pollution in California, the equipment and event rental industry has been leading the way by adopting clean engine technologies. ARA worked with ARB staff to develop the non-road diesel regulation that has driven the adoption of Tier IV diesel technology in the California diesel fleet. While developing that rule, ARA proposed a fleet averaging provision that allowed fleet owners to more efficiently manage their total fleet emissions and transition their fleets to become almost entirely Tier IV today. ARA's work of the non-road diesel fleet rule is an example of how the equipment and event rental industry has worked with the ARB to meet California's air quality goals.

Comment:

ARA's concerns with moving to zero-emission SORE equipment center around two basic issues: 1) requiring all new SORE equipment in MY 2024 and after to be zero-emission equipment, and 2) the battery disposal issue that will be facing equipment rental companies as more SORE equipment enters rental inventories.

Rental companies are unlike other typical owners of SORE equipment. Rental companies put a high premium on quality in the equipment they buy and maintain in their rental inventories. Equipment in rental fleet inventories is often newer than that owned by other end users, and it is almost always professional grade equipment because many customers are using the equipment in a professional setting and because professional grade equipment is more durable. Even so, rental equipment takes many hours of hard use and abuse requiring rental companies to frequently refresh their inventories. When rental companies replace old equipment, they replace it with new equipment with the latest emissions control technology. Just as with non-

road diesel, rental companies are leading the way in the adoption of low-emission and zero-emission technologies.

A specific concern we have with all SORE equipment purchased in MY 2024 and after being zero-emission equipment is the number of batteries that will be required to power this equipment. According to data developed by the outdoor power equipment industry, battery use for a typical rental of SORE equipment is significant. For example, leaf blowers need about 18 batteries over an 8-hour period. This means that the rental business must supply 8 fully charged batteries to the customer with the rental, and/or provide charging devices so that the customer can charge the batteries during the day and overnight if it is a multi-day rental. Similarly, a walk-behind mower requires 8 batteries per day, string trimmers and hedge trimmers require about 5 batteries each, and chainsaws require at least 12 batteries to work a full 8-hour day. Multiply these daily requirements by the hundreds or even thousands of SORE equipment units in California rental company inventories and it is clear that the demand for batteries by rental business could easily be in the tens-of-thousands. Further multiply that by the 900 rental business locations operating in California leads to the conclusion that the number of batteries needed in future years could be in the millions.

In addition to the significant increase in battery demand, there will be logistical issues for rental companies and their customers. While there is some penetration of SORE equipment in rental company inventories now, transitioning to a fleet that is 100 percent SORE equipment will require many more batteries and charging facilities than are currently required. Because rental companies replace equipment on a more rapid replacement schedule than other businesses, the transition to 100 percent SORE equipment will require significant near-term modifications to operating facilities to accommodate battery storage and recharging.

Moreover, the equipment and event rental industry is concerned about the disposal and replacement costs of batteries. Industry data on the lifecycle battery and charger costs for a leaf blower is \$10,776. These figures for walk-behind mowers, string trimmers, hedge trimmers and chainsaws are \$4,428, \$2,198, \$1,137, and \$3,971 respectively. These costs will be significant and ongoing for rental companies. ARA members in California have also expressed concerns about battery disposal and the environmental effects of millions of batteries that will have to be disposed of in coming years.

Rental customers will also face hurdles if the transition to 100 percent SORE inventories happens too quickly. Batteries are clearly an issue with significant numbers of batteries needed for each equipment unit on a particular job. In addition, some of this equipment will be used in places where electricity is not readily available for recharging. Thus, multi-day rentals will either require additional batteries or charging will have to be done using portable power generation. All of these issues will increase costs to rental companies and their customers.

Summary and Recommendations:

This comment only provides the somewhat narrow perspective of the equipment end event rental industry within California. There are obviously other industries affected by the proposed SORE regulations, particularly the manufacturers of SORE equipment. The Outdoor Power Equipment Institute (OPEI) is submitting comments on this proposal. ARA wishes to associate itself with OPEI comments on the timing of implementation dates. We would additionally suggest that ARB consider provisions like fleet averaging that was part of the non-road diesel rule as a viable transition mechanism to SORE adoption.