

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

First Name: Kenneth

Last Name: Bonus

Email Address: ken.bonus@gmail.com

Affiliation: San Diego Ultra Running Friends

Subject: sore2021

Comment:

Please see attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/1-sore2021-VyRdNABzVGICWwVm.pdf'

Original File Name: SORE comments 10-15-21.pdf

Date and Time Comment Was Submitted: 2021-10-15 07:20:04

No Duplicates.

## **Comment 2 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: Gardenworks Inc.

Subject: Small Off-Road Engine Regulations: Transition to Zero Emissions  
Comment:

I urge you to delay implementation of this action to at least 2030.

As a licensed landscape contractor and small business owner, earlier implementation will lead to economic hardship and potential loss of business.

While these efforts are to be applauded, current replacement of small gas engines with battery power is not reliably viable with current technology.

Some issues with this technology are as follows:

- charge capacity too small to run all day
- discharge rate anxiety by professional users (run down time highly variable depending upon use)
- reduced battery lifespans due to constant or frequent use
- insufficient torque/power (i.e. more power = less run time)
- higher price point to purchase
- no to little standardization in battery design
- issues with California's electrical grid including PSPS
- difficulty and or extra costs associated with the need for charging stations or carrying multiple extra batteries during work day

In general, the landscape industry is beginning to use some battery technologies such as portable power equipment (drills, Saws, chainsaws, small lawn mowers).

If battery technology was equal to small gas engines in power and price, I can assure you, many contractors would begin to make the switch. If nothing else we are a practical industry.

Thank you for your consideration

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-15 15:10:48

No Duplicates.



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

First Name: Ellen  
Last Name: Vaughan  
Email Address: ellenbamma@hotmail.com  
Affiliation: Santa Cruz Resident

Subject: SOREs no more  
Comment:

Hello,

I'd like to support your efforts to strongly regulate gasoline lawn  
equipment. CA can move the industry in the right direction.  
Electric options are available. Go for it!  
Thanks,

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-18 08:29:04

No Duplicates.

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

First Name: Howard  
Last Name: Florio  
Email Address: hjflorio@gmail.com  
Affiliation:

Subject: Generators for disabled  
Comment:

Please exclude generators for areas where PG&E loses power, areas such as Santa Cruz County. I am disabled and need power 100% of the time. I currently use a Honda 5000ex to power the refrigerator/freezer to store my perishable prescriptions and heat. If it weren't for the generator I don't know how I could exist at my home of 21 years. I cannot afford a Tesla wall battery and solar, which wouldn't last as long as needed up here in the mountains anyway. After the CZU fire we were out of power for weeks. I doubt battery generators that will last with the same energy and time usage by 2022 (maybe by 2035). Don't cut off our lifeline.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-18 13:44:57

No Duplicates.

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

First Name: LJ  
Last Name: Laurent  
Email Address: ljlaurent@att.net  
Affiliation: independent

Subject: SORE amending  
Comment:

Since this is "Model Year MY" the conversion date should be EARLIER. Immediate Manufacture of zero emission should be the Rule, NOT 3 long years away in the future.

After all, Breathing is a problem NOW.

"The proposed amendments would set emission standards for smog-forming pollutants to zero beginning with model year (MY) 2024 for all new SORE except for portable generator engines.  
Text proposed":

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-19 09:06:48

No Duplicates.

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

First Name: Michael  
Last Name: Lloyd  
Email Address: michaelloyd3280@gmail.com  
Affiliation: Retired

Subject: Proposed SORE regulations  
Comment:

I've always been a firm proponent of reasonable environmental laws, but the proposed SORE regulations are very impractical, at least in rural areas of the state.

For forty years, I've lived on 20 acres of steep oak woodland and wild grassland in the hills of Mendocino County.

After the seasonal rains stop every spring, due to the fire danger and Cal Fire mandates I have to cut several acres of wild grass around my home and along both sides of my 750-foot-long driveway with a string trimmer ("weed eater"). Since it's impossible to predict when the last seasonal rain falls, my neighbors and I sometimes have to cut three times.

A battery-powered string trimmer only lasts roughly 20-30 minutes before needing several hours of recharge, and the cutting is much slower than with a gas-powered device. An extension cord for an electric trimmer will only go so far, and can throw sparks into dry grass where cords plug together.

The grass isn't cut for landscaping purposes, but to enable Cal Fire to try and save my home, and maybe give us precious seconds to escape a wildfire.

This spring, due to the drought, three oak trees, plus seven Douglas fir that I planted 25 years ago all died. The oaks simply fell over, the seven Douglas fir I had to cut down. One of the oaks fell across my driveway leaving sixty feet of tangled branches across my driveway, stranding the house and my vehicles on the wrong side of the blockage. I had to cut for days and days to make pieces small enough to stack on level ground. The Douglas fir I cut up to pack uphill out of the woods.

I don't know what I'd do with battery-powered chain saw, or an electric one.

A lot of forest waste can be chipped instead of control burned. But chippers need gas engines, and don't work very far from a road.

Obviously the problem of dead trees isn't just my own, it extends all over fire-prone northern and central California.

And then there's my 80+year-old neighbor, who lives alone in the woods off the grid. She has solar panels for electricity, with a

generator for when the sun doesn't shine due to prolonged bad weather, especially when the days are short. She needs a gas-powered backup generator to charge her storage batteries. No power, no light. And no water from her well pump.

Cal Fire needs large gas chainsaws to fight wildfires. The logging industry needs chainsaws to operate far from electricity. Second-and third-growth forests need thinning to be healthy. If a battery goes dead cutting down a tree, the tree can start splitting up the middle threatening the safety of the faller.

And if people in the cities can't grow lawns economically due to the high cost of mowing, converting to rock gardens and wood decks mean that the grass won't be there to cleanse the air and absorb heat.

How will the power used to generate the electricity to charge the battery originate? Hydropower, geothermal, wind and solar won't be enough.

Please pardon if I've misinterpreted some of the proposed regulations. Information is spotty and contradictory at this stage of the game.

Thank you for your time.

Michael Lloyd

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-21 11:07:31

No Duplicates.



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

First Name: Jeremy

Last Name: Van Groningen

Email Address: twistedmetal4x4@gmail.com

Affiliation:

Subject: Please remove ridiculous restrictions!

Comment:

It has become clear to me that the California air resources board will only allow you to pollute if you have a lot of money. I have made numerous air pollution complaints unto facilities I live down wind from. They continue to pollute on a daily basis. As a victim of ridiculous legislation that has forced me to sell perfectly good equipment and has drastically altered my way of life and my ability to make a living I can say that as a tax-paying member of society I am considering moving to another state where the legislation and cost of living doesn't put a strain on me and my family. Now there is legislation that has been and is further limiting my Recreation. Please be realistic and consider fuel reduction in the forest as a way to limit carbon emissions as an alternative to the drops in the bucket of emissions that this legislation attempts to halt.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-25 10:20:04

No Duplicates.

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

First Name: John

Last Name: FERNANDEZ

Email Address: garveyequipment@sbcglobal.net

Affiliation: GARVEY EQUIPMENT COMPANY

Subject: SORE HEARING - December 9, 2021

Comment:

Please see the attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-sore2021-AmFTNF0uBzYAWQk4.pdf'

Original File Name: CARB 10-25-2021.pdf

Date and Time Comment Was Submitted: 2021-10-25 13:18:54

No Duplicates.

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

First Name: GLORIA  
Last Name: MACARAI  
Email Address: chrislawnmower@hotmail.com  
Affiliation: Chris's Lawnmower Shop Inc

Subject: CA Bill AB1346 Ban of Small Engines  
Comment:

I am writing to you today as a concerned constituent in opposition to AB 1346 and CARB's proposed rule to ban small engine powered equipment in California by 2024. These proposals ,if enacted, would result in significant hardships for my small business, and thousands of independent landscapers/gardeners be put out of business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:59:20

No Duplicates.

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

First Name: Debbie  
Last Name: Bozzelli  
Email Address: bennysspraycenter@yahoo.com  
Affiliation:

Subject: ca bill ab1326 ban small engines  
Comment:

November 3, 2021

I am a an industrial supplier to commercial cleaner / small business owner operating a commercial cleaning business servicing Caltrans, City of Stockton Parks and Rec, City of Stockton Graffiti embayment, KFC, Taco Bell, San Joaquin County Sheriffs Department Correctional (municipalities / office parks / retail /residential customers) in the greater Northern California area for the past 33 years.

I proudly come from the Stockton community located in San Joaquin County. I employ 10 workers and we take great pride in the service we provide the community.

For the last 30 years, we partnered with Caltrans, City Of Stockton, Unified School Districts of Lodi Stockton Linden, Manteca, San Joaquin County Sherriff's Department and many other city and county officials to clean roads, walk ways, jails, restaurants, and malls and the (main / most efficient) tool they use is an internal combustion powered pressure washer. Beyond this we have 77 of crews working daily. The mandate of no internal combustion engines being considered would eliminate the jobs of nearly all of our staff and their staff.

We care deeply about a clean environment for both the health of our neighbors and beauty of our community. In Stockton and surrounding communities. We have participated in water recovery / water treatment as well as propane burner usage in accordance with all state and local regulations.

Thank you for your consideration.

Best Regards,

Benny Bozzelli  
Vice President Owner

Debbie Bozzelli  
President Owner

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:00:37

No Duplicates.

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

First Name: Nicole  
Last Name: Brady  
Email Address: geysers@sbcglobal.net  
Affiliation:

Subject: AB 1346  
Comment:

I am an industrial supplier to commercial cleaner / small business owner servicing (municipalities / office parks / retail / residential customers) as well as military, state, county and city interests in the Inland Empire area for the last 27 years. I employ 5 workers and we take great pride in the service we provide the community. Throughout the covid19 pandemic pressure washers with internal combustion engines were one of the front lines of defense. The mandate of no internal combustion engines being considered would eliminate the jobs of all of our staff and ultimately make us close our business. We care deeply about a clean environment for both the health of our neighbors and beauty of our community but without a viable alternative we need to stop this bill now. Thank you for your consideration.

Nicole Brady  
Geysers Equipment, LLC

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:11:45

No Duplicates.

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

First Name: Susan  
Last Name: Johnson  
Email Address: sue@sierramotorsports.com  
Affiliation:

Subject: SORE 2021  
Comment:

See Attachment

Attachment: 'www.arb.ca.gov/lists/com-attach/12-sore2021-BmVWMVEiU2IFXAd0.docx'

Original File Name: CARB SORE 2021 letter.docx

Date and Time Comment Was Submitted: 2021-11-04 17:57:52

No Duplicates.

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

First Name: Ben

Last Name: Hagemann

Email Address: Ben@AmericanPressureInc.com

Affiliation:

Subject: Delay SORE for Pressure Washers

Comment:

I have been in the pressure washer industry for decades specifically the business to business segment. Industrial equipment generally with 10HP to 25 HP engines. Those pressure washers are able to conserve water over smaller equipment. Many types of cleaning happen over night and in places where higher power to run electric units is not available. These applications are real and very difficult, if not completely impossible to manage with battery technology. A small part could be replaced with higher voltage (230V Single or 3 Phase), however hooking up to these power sources for a contractor poses many safety risks to the public and contractor in the small of amount of places that would work. Pressure washers use a great deal of energy in order to conserve water and labor, in a way that cannot be done with battery technology. How much extra water will be required if the gas engine units and the performance they offer isn't available?

I think a delay of implementation of the SORE rules for Pressure Washers, especially industrial, should be delayed. My limited research shows that gas engines produce between .52 and .59 pounds of carbon dioxide/KWH of energy. Looking at the site that shows CA emissions for power (which is an awesome tool and site), shows numbers ranging from .16 to .34 pounds of CO2/KWH. So I can see that there is a savings that might average to about a savings of about .32 pounds of CO2/KWH. That as an awesome savings. But the national average for power generator is .92 pounds of CO2/KWH. Clearly California is leading in Green House admissions. However, right now it seems that each small engine that is replaced in CA with electric would produce MORE CO2, as CA could provide that greener power supply to the rest of the country. Think of it, if you can eliminate .92 pounds of CO2/KW, or even more as that is a weighted number at it includes California Power.

Has the comparison of .59 pounds CO2/KWH for SORE been compared with the much higher environmental cost of .92 pounds of CO2/KWH from power generation?

I encourage you to delay the Pressure Washer engine requirement until at least 2028 for the sake of CO2 emissions alone, but also because pressure washers serve needed functions that provide water savings and health benefits and offer employment to many, especially in the minority communities. I also think that many SORE will be eliminated for residential users because the big box stores will trend towards battery powered. Those are not commercial and won't meet the needs of many applications, but many SORE will be eliminated. Also and for reasons we all probably



understand stationery pressure washers that are used in factories and other places that could use electricity for supplying power already are.

Thank you again for reading this and answering if it would be best to wait until over all power generation was lower in CO2 output than a gasoline engine per KWH, if a water analysis has been done on this, including waste water recover technology that often requires the higher HP of large SORE engines, if minorities would be effected more by these changes in regards to contract cleaner owners, operators and employees.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 12:15:43

No Duplicates.

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

First Name: Jim

Last Name: OConnell

Email Address: joconnell@hotsypacific.net

Affiliation:

Subject: Comment for SORE implementation

Comment:

I have been in the pressure washer industry since 1983, specifically the sales and service of pressure washers in the business to business segment. We primarily deal with industrial equipment generally with 10HP to 25 HP engines. Those pressure washers are able to conserve water over smaller equipment. Many types of cleaning happen overnight and in places where higher electrical power to run electric units is not available. These applications are real and can be very difficult, if not completely impossible to manage with battery technology. A small part could be replaced with higher voltage (230V Single or 3 Phase), however hooking up to these power sources for a contractor poses many safety risks to the public and contractor in the small amount of places that they could possibly work. Pressure washers use a great deal of energy in order to conserve water and labor, in a way that cannot be done with current battery technology. How much extra water will be required if the gas engine units and the performance they offer isn't available? Consider the fact that an average garden hose produces 10 gallons per minute while an average pressure washer consumes 4 gallons per minute. Another aspect of water use is the recovery operation of the water in an outside cleaning environment. All mobile water recovery systems use small gas engines, how will this affect that operation?

I believe a delay of implementation of the SORE rules for Pressure Washers, especially industrial, should be delayed. The research shows that gas engines produce between .52 and .59 pounds of carbon dioxide/KWH of energy. Base upon the site that shows CA emissions for power shows numbers ranging from .16 to .34 pounds of CO2/KWH. So I can see that there is a savings which could average to about a savings of about .32 pounds of CO2/KWH. This would be an incredible savings, based on the national average for electrical power generation is .92 pounds of CO2/KWH. Clearly California is leading in Green House emissions. However, right now it seems that each small engine that would be replaced in CA with electric would produce MORE CO2, as CA could provide that greener power supply to the rest of the country. Think of it, if you can eliminate .92 pounds of CO2/KW, or even more as that is a weighted number as it includes California Power.

Has the comparison of .59 pounds CO2/KWH for SORE been compared with the much higher environmental cost of .92 pounds of CO2/KWH from power generation?

I would encourage you to delay the Pressure Washer engine requirement until at least 2028 for the sake of CO2 emissions alone, but also because pressure washers serve needed functions that provide water savings and health benefits and offer employment to many, especially in the minority communities. This will also allow the battery technology to catch up with the larger power requirement needed for the industrial pressure washers. I also think that many SORE will be eliminated for residential users because the big box stores will trend towards battery powered equipment. Those are not commercial units and won't meet the needs of many applications, but many SORE will be eliminated. Also stationery pressure washers that are used in factories and other places that could use electricity for supplying power are already in use.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 11:09:10

No Duplicates.

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

First Name: Ty  
Last Name: Riggins  
Email Address: tbignutz87@yahoo.com  
Affiliation:

Subject: sore2021, Just not logical.

Comment:

CARB is gambling, staff has stated industry will figure out solutions that are equivalent to SORE and zero emissions. They are gambling with the lives and livelihoods of many Californians. Currently there are no alternatives to engines in many categories.

The logical decision would have been to require stricter emission requirements in stages. It is feasible. Today it is possible to reduce the emissions of SORE, have it cost less than inadequate performing ZEE, and not induce the other issues of ZEE such as waste, power generation, etc. This is not to say ZEE doesn't have a place, there are several areas where using ZEE is a better alternative, however banning all at one fell swoop is irresponsible. My plead with CARB and its staff is reconsider your approach, where there are no viable alternatives to SORE, tighten emission limits. Please don't gamble Californians lives by "betting on black".

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 13:58:03

No Duplicates.

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

First Name: John

Last Name: Kimmel

Email Address: john@splashwindow.com

Affiliation: Splash Window Cleaning & Powerwashing

Subject: concerns of AB-1346 as a pressure washing contractor

Comment:

I'm writing in behalf of professional mobile cleaning contractors, (pressure cleaning companies). This group of professionals helps maintain sanitation, keeps our streets and facilities cleaned and safe. I fear your proposal will harm this industry worldwide. We already have a challenging supply demand with engines in this size being on back order. With this change there will surely be large companies buying mass amounts of engines prior to 2024 making it nearly impossible for smaller companies to maintain their business's, by completely stopping their ability to get the equipment needed. This will only lead to poor sanitation, increased slip hazards and simply a dirtier place to call home. Restaurants require hood cleaning, which with fewer contractors may increase fire hazards and deaths. Think about your children playing at a dirty unsanitary playground because there's not enough contractors to maintain cleanliness. I ask you to please don't take this group of professionals for granted. We all live in, work at and visit a place that needs ongoing cleaning. In addition pressure washers reduce water consumption, which water use will surly increase drastically.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 19:54:58

No Duplicates.

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

First Name: Sari  
Last Name: Fordham  
Email Address: sfordham@lasierra.edu  
Affiliation:

Subject: Support  
Comment:

I support a transition to Zero Emissions for small off-road vehicles.

Air pollution is a serious problem and our children deserve our energetic shift toward zero emissions. The technology is here. Let's be forward thinking and transition toward a safe future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 21:22:59

No Duplicates.

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

First Name: Michael

Last Name: Getter

Email Address: capowerclea@gmail.com

Affiliation:

Subject: Pressure Washing Contractor

Comment:

The ban on small motors will affect the cleaning industry since there is no alternative in the market. We will struggle to find a way to keep the streets and homes clean in this state

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 03:10:33

No Duplicates.

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

First Name: Gary  
Last Name: Gilbert  
Email Address: hikergail2010@gmail.com  
Affiliation:

Subject: SORE  
Comment:

I am a believer in reasonable environmental laws but the proposed SORE regulations are not practical in CALFIRE's State Responsibility Areas, areas governed by PRC 4291.

We have 4.5 acres adjacent to the Sierra National Forest. We've lost 45 mature ponderosa pines to the bark beetle infestation along with numerous large oaks. It would be impossible to clear and remove these fire hazards with battery powered chainsaws. Since we are adjacent to the Sierra National Forest where no land clearing or management has occurred it is incumbent upon us to weed eat our 4.5 acres to provide a margin of safety to our home. A battery powered weed eater does not have the horsepower necessary, or the battery life, to complete this task and comply with CALFIRE's requirements.

We respectfully request an exemption from SORE regulations for residents residing in State Responsibility Areas of California.

Gary Gilbert, Retired  
CalFire Region Chief

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 13:04:15

No Duplicates.



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

First Name: Barry

Last Name: Lambert

Email Address: sdallcountypowerwash@gmail.com

Affiliation: All County Power Wash & Steam Cleaning

Subject: Small gas engine ban

Comment:

To whom it may Concern:

I am a commercial pressure washing company located in San Diego and been in business over 20yrs. The equipment I use (small gas engines) are imperative to keeping areas clean and sanitized as well as for water reclaiming. There is no electric equipment strong enough or efficient enough to handle these tasks. As a commercial business my families livelihood depends on this equipment not to mention keeping areas like shopping centers and municipalities clean. Not being able to use this equipment will cause a build up of rodents and diseases as we use hot water also. This will be a public safety concern. My recommendation is if banning small gas engines is non negotiable, then banning personal/home use engines and make licensed commercial businesses exempt from this. Electric applications are good, but not in the case of commercial usage. The environment will be much worse by this new proposed law and you will find sanitation to be the biggest issue, second being aesthetics. I strongly urge you to consider these issues because if they aren't dealt with prior to the law being in effect, I'm afraid you will be addressing them at a later date. If you have any questions, please contact me.

Regards,

Barry Lambert

All County Power Wash & Steam Cleaning, Inc.

Attachment: 'www.arb.ca.gov/lists/com-attach/22-sore2021-BTJTZAA1VTZXYFVh.jpeg'

Original File Name: 7140147D-21E5-40CC-9D04-999D32CB48AC.jpeg

Date and Time Comment Was Submitted: 2021-11-09 13:40:22

No Duplicates.

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

First Name: Yujin  
Last Name: Anderson  
Email Address: yyoo@steamericas.com  
Affiliation:

Subject: Please Delay AB 1346

Comment:

Firstly, as a California resident, I do appreciate your efforts to minimize climate changing emissions. As a mother of 3 young children living in Southern California, I care deeply about the air quality and believe we should take actions sooner than later, but with a plan to support those who will be immediately affected by the change in place. At work I serve many customers who are very hard working small business owners whose livelihood depends on professional and commercial equipment listed as SORE.

I am afraid prematurely moving forward with banning small engine powered equipment in 2024 without having alternative technology at a comparable price range and performance will not have the support from small business stakeholders. As it stands, it would have numerous negative impacts on landscapers, mobile washers, commercial contractors, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial and residential customers they service.

Currently professional-grade battery/electric equipment to run many hours straight without charging intermittently in commercial service settings - and the infrastructure needed to charge, transport safely, and recycle it - doesn't yet exist at the scale necessary to meet the state's accelerated timelines.

In the industry I serve (commercial cleaning, pressure washing), the majority of the (equipment) end user customers are small businesses (dis-proportionally minority owned or/and operated) who may or may not have financial means to upgrade their equipment even if comparable technology and infrastructure to support it readily existed. It is also my belief that substantial rebates or subsidies programs (far more aggressive than South Coast AQMD rebates for lawn and garden equipment) should be offered to mitigate financial burdens from upgrading equipment to small business owners for this effort to work until the battery technology truly becomes mainstream and affordable to all.

To make a difference in improving the air quality, the majority need to comply. Without feasible means to get the majority who will be directly affected by it on-board, the adoption of the new bill will only result in a colossal waste of time and tax dollars.

With this in mind, I respectfully request the Legislature and CARB postpone efforts to ban small engine powered equipment until the cost and performance of comparable electric/battery powered

equipment meet commercial, emergency, and rural residential use needs. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 14:33:52

No Duplicates.

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

First Name: Craig  
Last Name: Barretto  
Email Address: craigbarretto@rocketmail.com  
Affiliation: Owner Operator

Subject: Reversal of new small-engine law.

Comment:

We provide homes with multiple services with the use of gasoline hand held blowers and hard scape pressure washing tools. It's effective and efficient for business, and allows us to provide many homeowners and renters a great way to keep their home and neighborhoods clean. Removing (not making them for future persons/businesses) these efficient tools that will in all likelihood under-improve our state's smog emissions will very likely hurt small and medium businesses instead. Battery operated engines are not currently light enough, effective enough, repair-easy as the gas counterpart. The answer to affectively reducing and or removing bad emissions worldwide is for countries to grow more forests and reduce construction development (and the energy & equipment that is needed to build it), reduce automobiles by nation-advocating walking or biking distance local shopping, and for government to assist in providing finances for inventors and educators in the small engine industry to produce tools that are as efficient and effective or better than current ones; BUT we are not there yet!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 15:54:06

No Duplicates.

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

First Name: Fred  
Last Name: Carter  
Email Address: fred@cartersppw.com  
Affiliation: Pressure Washing Company

Subject: Reconsider Ban of small off-road engines

Comment:

Hello and thank you for taking the time to read my concerns regarding the Ban of small off road gas engines.

I started Carters Precision Pressure Washing to do two things. Make a living and help the surrounding communities.

I am not against programs that help to heal the environment. I believe this measure is too harsh on the people that rely on the engines to make a living. There is currently no technology to replace the small off road engines.

This ban will cause thousands of businesses to have to close their doors. It will not only effect the business owners but those that work for them too. Ultimately, it will effect economy of our state with the loss of hundreds if not thousands of jobs.

Is there to a chance to ban the small off road engines to the basic consumer on the 2024 date and allow those running a business with machinery to continue to purchase for an additional time.

Our city needs the small businesses to clean the dirt and grime that accumulates on our streets, sidewalks and structures.

These businesses help in many ways past the pollution that is created by the engines that run the equipment. We manage water usage while cleaning and when reclaiming used waste water. It is not only for the beautification but helps to sanitize

I hope those in power take the time to look at an alternative to the hard line set to stop sales of the small off road engines. How it effects those doing business in the state of California.

Best regards.

Fred Carter  
Carters Precision Pressure Washing Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 16:03:53

No Duplicates.

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

First Name: Amber  
Last Name: McMichael  
Email Address: buriedbybooks@gmail.com  
Affiliation:

Subject: Chainsaw ban  
Comment:

The current proposal to ban the sale of gas powered chainsaws is set to cause immeasurable safety issues for rural California. While electric chainsaws may work for suburban homeowners and businesses, they are patently unsafe for large jobs including falling trees for firewood or as used by HotShot crews to remove hazard trees in fire zones.

It is unsafe to have a chainsaw run out of power out in the woods mid-cut and is obviously not possible to simply plug it in. An exception for rural CA should be made.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 17:52:20

No Duplicates.

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

First Name: Ron  
Last Name: Bunch  
Email Address: muleyhunter41@comast.net  
Affiliation:

Subject: Sore2021  
Comment:

I am against this proposal. I urge you vote against it. It absolutely no sense at all. How do you propose loggers to pack around a bunch of batteries in the woods? How many people do you want to put out of work?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 19:08:00

No Duplicates.



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

First Name: Eric  
Last Name: Tower  
Email Address: Eric@OctoProWash.com  
Affiliation:

Subject: Deep Concerns about AB-1346 as a California Pressure Washing Contractor  
Comment:

Dear CARB,

Below are 5 primary reasons why I think you should reconsider your timeline and conditions with AB-1346. Please take these items into account, I am a concerned pressure washing contractor in this lovely state who use to live on the street 11 years ago and this industry has helped me create a life for myself and my employees that we are forever thankful for.

- 1.) Health and Safety - Power washing is a very efficient way to keep sidewalks slip-free to OSHA standards, sanitized and clean, which reduces the spread of infectious diseases, rodents, and pests.
- 2.) Power Washing is a green method of cleaning. It tremendously reduces the usages of water and dangerous chemicals being used while cleaning. Maintenance cleanings and restoration processes provide an extended lifespan to surfaces and building materials which reduces the carbon footprint of replacements.
- 3.) Gas-powered reclaim systems are paramount in controlling wash water so contractors can obey the Clean Water Act(1972). It's important to keep our waterways pollution-free.
- 4.) Directly affects minority and low-income individuals - Pressure washing is a lower barrier of entry providing a gateway out of poverty. A power washing technician can make a living wage with benefits in the state of California and provide for their families.
- 5.) There is current cost-efficient technology that can dramatically reduce emissions put off from small engines up to 90%+. Moving to zero emissions this fast with the current best available technology is inadequate, and will force businesses to close, cut staff, and/or raise the cost of services significantly.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 21:58:43

No Duplicates.



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

First Name: Jerry

Last Name: Askey

Email Address: sierrajer@gmail.com

Affiliation:

Subject: Small off-road engine requirements.

Comment:

This regulation will put a cost on people with not a lot of money that is not fair. How about we do away with congress members not flying in private jets.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 06:09:13

No Duplicates.

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

First Name: Mike  
Last Name: Falge  
Email Address: mfalge@hotmail.com  
Affiliation:

Subject: Small engines  
Comment:

This bill will hurt all of rural California, be it farms,ranches,  
logging,construction and home owners

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 06:26:28

No Duplicates.

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

First Name: Clint

Last Name: Cam

Email Address: Mtnmac@aol.com

Affiliation:

Subject: Small off road engine regulations

Comment:

I'm concerned about the pending regulations of off road engines, specifically generators used for back up power. I live in the Santa Cruz mountains, and 4 years ago removed my wood stove, replacing it with a electric heat pump. This was done to reduce air pollution, save energy, and improve air quality in my house. I did this knowing I would have to increase the size of the generator I use to provide back up power in the winter. We have many power outages in my area every winter. Solar panels/battery back up is not possible due to the surrounding redwood forest. Battery back up using the power grid is of limited use when some outages are 3-7 days. The battery capacity to power a heating system would be huge and very expensive. Removing our ability to use generators for backup power would make life very difficult for my family and many others in similar areas during power outages. Please consider an exemption for generators in areas where there are no alternatives.

Thank You

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 08:07:58

No Duplicates.

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

First Name: Jena

Last Name: C

Email Address: jena.c@ymail.com

Affiliation:

Subject: Making small gas engines illegal

Comment:

First of all, we'll buy our small engine needs in another state.  
Secondly, how are firefighters supposed to fight fire with battery  
operated chain saws? Or will the state be exempt from their own  
law? Leave us alone!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 09:17:45

No Duplicates.

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

First Name: Evan

Last Name: Bersentes

Email Address: Bersentes22@gmail.com

Affiliation:

Subject: Ab1346

Comment:

I oppose this due to the hardship this will put on many especially gardeners and those who can't afford to buy new products, this to me seems like another power grab to increase regulations. This need to be a choice. Not a forced mandated regulation. Instead why not offer incentives for those who would like to participate.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 09:35:25

No Duplicates.

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

First Name: Deanna

Last Name: Pate

Email Address: Bersentes22@gmail.com

Affiliation:

Subject: Ab1346

Comment:

I oppose this due to the hardship this will put on many especially gardeners and those who can't afford to buy new products, this to me seems like another power grab to increase regulations. This need to be a choice. Not a forced mandated regulation. Instead why not offer incentives for those who would like to participate.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 09:35:25

No Duplicates.



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

First Name: Bill  
Last Name: Hoover  
Email Address: president@sierra2.org  
Affiliation: Sierra Curtis Neighborhood Assn.

Subject: Support Proposed Amendment to Small Off-Road Engine (SORE) Exhaust & Evaporative

Comment:

November 4, 2021  
Dorothy Fibiger  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Support For Proposed Amendment to Small Off-Road Engine (SORE)  
Exhaust & Evaporative  
Emissions

Dear Ms. Fibiger:

The Curtis Park neighborhood is a politically active and vibrant 2,500 household community located in South Sacramento. The Sierra Curtis Neighborhood Association (SCNA) holds monthly board meetings to address neighborhood issues, manages the Sierra2 Center for the Arts & Community, hosts many annual events, and publishes monthly the Viewpoint newspaper.

SCNA strongly supports the proposed amendment to small off-road engines (SORE) which would set emission standards for smog-forming pollutants to zero for all new SORE beginning with the 2024 model year. Small off-road engines include, leaf blowers, lawn mowers, weed trimmers, chain saws, golf carts, generators pumps, and specialty vehicles. Small generator engines are exempt from the zero emission standards. However, the proposed amendment would make the emission standards more stringent for generator engines beginning with the 2024 model year. The emission standards would be zero for generator engines for the 2028 model year.

SCNA has been actively involved in zero emission equipment (ZEE) for yard care. The Sierra 2 Center contracts with FRESH AIR Yard Care which uses only electric and hand powered equipment to maintain the landscape. SCNA has a Clean & Quiet Yard Care Ad Hoc Committee that promotes and educates the neighborhood about greener alternatives to yard care at community events and through their website  
<https://sierra2.org/neighbors-see-cleaner-quieter-yard-care-tools/>

Please let us know if there is any other actions SCNA can take in support of the proposed SORE zero-emission standards.

Sincerely,

William Hoover,  
Board President, Sierra Curtis Neighborhood Association  
president@sierra2.org, (916) 452-3005

Attachment: 'www.arb.ca.gov/lists/com-attach/37-sore2021-UzBQNwFyADEHbVAk.docx'

Original File Name: CARBLtrreSORE Emissions11.4.21 final.docx

Date and Time Comment Was Submitted: 2021-11-10 11:35:43

No Duplicates.

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

First Name: Kyle  
Last Name: Turk  
Email Address: kturk@holtca.com  
Affiliation:

Subject: AB1346  
Comment:

Dear SORE Lead Dorothy Fibiger,

I am writing to you today as a concerned constituent in opposition to AB 1346 and CARB's proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers, many of whom are minorities and your constituents.

Moving forward with banning small engine powered equipment in 2024 would have numerous negative impacts on landscapers, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial and residential customers they service.

These proposals would drastically limit equipment choice for professional landscape contractors and outdoor power equipment dealers across California. We are small businesses who rely on small engine powered equipment every day as cost-efficient and high-performing solutions to install and maintain living landscapes and green spaces in communities throughout the state.

As battery technology has advanced, so too has the availability of electric outdoor power equipment. However, professional-grade battery/electric landscape equipment - and the infrastructure needed to charge, transport safely, and recycle it - doesn't yet exist at the scale necessary to meet the state's accelerated timelines.

While I appreciate the efforts of legislators and CARB to address California's air quality needs, the small engine-powered equipment category is a comparatively minimal contributor to the state's emissions. Further, the living landscapes our equipment is used to install and maintain contribute to tangible environmental benefits, including reductions in the heat island effect, carbon sequestration, trapping dust and particulate matter, providing habitat for pollinators, and producing oxygen.

With this in mind, I respectfully request the Legislature and CARB postpone efforts to ban small engine powered equipment until cost and performance of comparable electric powered equipment meet commercial, emergency, and rural residential use needs. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Regards,  
Kyle Turk  
1049 57th St  
Sacramento, CA 95819  
Image removed by sender.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 19:45:04

No Duplicates.

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

First Name: Robert  
Last Name: Roadifer  
Email Address: theroadifers@frontiernet.net  
Affiliation:

Subject: Small Off-Road Engine Regulations  
Comment:

If this bill is not removed it is going to put a lot of small business out of business. Not to mention more business will leave the state cause unemployment to go up. People will go out of state and purchase these items anyway. Pluss the publics electric bill's will increase. I can not see how this is going to effect any good change in air quality anyway because most small off-road engines do not emit very much emissions. Why put people out of work or force businesses to leave the state when the economy is so bad. I have looked at a lot of the studies and for the most part they do not take into consideration the large rural counties and how this is going to effect those economies.  
Thank you for taking the time to read this.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 19:37:21

No Duplicates.

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

First Name: Tanya

Last Name: Chamberlain

Email Address: chamberlain.tanya@gmail.com

Affiliation:

Subject: Ineffective Use of the Law

Comment:

A ban on small gas powered motors is unnecessary and ineffective. A complete reliance on electric power has consequences too. It is not a thoroughly clean source of energy and most importantly our existing infrastructure cannot support it. New regulations on circuit breakers are causing modern & up to date coffee makers and microwaves to trip breakers. There is already much strain between restricted home warming fires and space heaters tripping breakers. Stop cutting us off on both ends.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 05:12:15

No Duplicates.

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

First Name: Levi

Last Name: Rynearson

Email Address: Rynearsonlevi@gmail.com

Affiliation:

Subject: Transition cost

Comment:

The only concern I have is that this transition to electric motors be directed at minority communities as well. Many small landscaping businesses don't always have the best English skills so they would need this information in their language of preference. This transition should also be subsidized for lower income business owners. Many of the landscape maintenance community do not gross a high income and this transition might be costly to them.

Attachment: "

Original File Name:

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

No Duplicates.

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

First Name: Bob  
Last Name: Laverty  
Email Address: bob@gbdorning.com  
Affiliation: Glenn B. Dorning, Inc.

Subject: Small Off-Road Engine Regulations: Transition to Zero Emissions  
Comment:

As a distributor of gasoline and diesel powered lawn mowers, we believe more time is needed for the electric machines to be developed. The power is not there, to operate properly, the price is too high, and the supply chain needs more time to stabilize to support this change.

Thank You

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:33:05

No Duplicates.



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

First Name: Ian  
Last Name: Campbell  
Email Address: ian.campbell@davey.com  
Affiliation:

Subject: Time to go green  
Comment:

I feel as we are the "green" industry we need to be embracing this change and thus changing our image. If our goal is to appeal to a younger generation of new members we will only do so if we care what they care about. Over the last several years members of our industry have benefited financially like never before, while it is a cost to change it's one we all must be willing to pay. I understand the hesitation with change, but this will be a good one. Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:34:38

No Duplicates.

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

First Name: STEVE

Last Name: MCILROY

Email Address: PREMIERSCAPES1@MSN.COM

Affiliation:

Subject: Gas powered equipment

Comment:

I do not see how they will be able to provide non gas powered equipment to handle large commercial properties from a landscape maintenance stand point. Also in the past the cost of such is absorbent and we are unable to pass all those costs along to our customers. If government wants to pass such a Law then the equipment must have multiple manufacturing options and to ensure replacements and repair shops are available. Financial aid needs to be given to us to avoid closing business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:41:14

No Duplicates.

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

First Name: Francesca  
Last Name: Corra  
Email Address: fcorra@aol.com  
Affiliation:

Subject: gas-powered equipment  
Comment:

Gas powered blowers have been outlawed for many years with no enforcement. Maintenance companies have known this and have just been trying to get away with it for as long as possible. And they will continue to delay until the last possible moment. So even if you move the date forward, it will not cause folks to purchase new equipment until the deadline. So demand will not be created and we will be in the same exact position 4 years later.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:37:34

No Duplicates.

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

First Name: Jeff

Last Name: Campbell

Email Address: jcampbell@aetnahhl.org

Affiliation:

Subject: Gas powered equipment

Comment:

Another plan to kill small business in the USA. Reject this "law"  
before it's too late.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:46:18

No Duplicates.

**Comment 43 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: No ban on gas equipment  
Comment:

A ban on gas equipment is the elimination of the landscape industry. This ban is a unrealistic endeavor. Our California representatives and governor should have never just spewed out this ban. If they actually did some tease arch they should have started with residential sales. Homeowners account to more gas powered equipment then all of the landscapers put together. To equip one truck for electric powered equipment there has to be a on board generator, 20-30 spare batteries. Now what happens when the power grid fails. How do these companies operate? They don't! Again this ban would kill the landscape industry! Governor Newsom does not know how to run a state and has destroyed California!

Attachment: 'www.arb.ca.gov/lists/com-attach/47-sore2021-UWVRYlZnWDtWaAE4.jpeg'

Original File Name: 450089D2-719C-4E05-B820-805EEE47C6B5.jpeg

Date and Time Comment Was Submitted: 2021-11-11 16:37:44

No Duplicates.

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

First Name: J

Last Name: A

Email Address: Ja @aol.com

Affiliation:

Subject: Maintance Equitment

Comment:

No we should not do away with gas powered equipment.  
We have enough trouble getting paid a price that we should be  
getting for work that we do. With battery equipment we will need to  
change more money for are work and we are not being paid enough for  
the work we do now

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:45:43

No Duplicates.

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

First Name: Manny

Last Name: Mendes

Email Address: Manny@libertylandscaping.com

Affiliation:

Subject: 2024 Ban on gas powered equipment

Comment:

2024 does not allow enough time for the commercial landscape companies to implament the change for our business. The development of efficient mowers, the high costs, and supply chain issues it's going to cause will require at least 2-3 more years. 2027-2028 would be more conducive.

Manny Mendes

Regional Manager

Liberty Landscaping Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:52:24

No Duplicates.

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

First Name: Bob  
Last Name: Weiland  
Email Address: bweiland@wai-inc.com  
Affiliation: Weiland & Associates, Inc.

Subject: Gas powered equipment  
Comment:

There are some advantages to electric equipment.  
I understand a few companies are working on hybrid equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:08:36

No Duplicates.



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

First Name: Alison

Last Name: Fleck

Email Address: alison@simplyperfectgardens.com

Affiliation: citizen and landscape professional

Subject: Zero emissions yes

Comment:

Please transition to zero emissions for small off road engines. It is time to take air pollution seriously.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:12:38

No Duplicates.

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

First Name: Susan  
Last Name: Van Atta  
Email Address: sva@va-la.com  
Affiliation: Landscape Architect

Subject: Gas Blowers/Landscape Maintenance  
Comment:

Dear California Air Resources Board,  
Gas blowers and other gas-operated landscape maintenance equipment should be banned as soon as possible. They create noise as well as air impacts that affect the equipment handlers as well. These machines do not clean, they only move dirt and leaves to neighboring areas.  
The generous timeline to eliminate gas-operated equipment could be used to train all the well-meaning maintenance personnel and their employers in healthier maintenance techniques. Many of the people unhappy about the ban cannot imagine another way to accomplish their work.  
Perhaps training is a positive step the State of California can help implement. The person that helps me with my office and home landscape maintenance received free bi-lingual water-efficient landscape maintenance training sponsored by the City of Santa Barbara and City College many years ago. This resulted in greater pride in his work, along with saving water.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:47:58

No Duplicates.

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

First Name: Kevin  
Last Name: Sorrells  
Email Address: ksorrells@aol.com  
Affiliation:

Subject: gasoline-powered commercial landscape equipment  
Comment:

To whom it may concern  
I run a small commercial landscape business  
If I have to change for gasoline-powered equipment to electric this  
will put a huge burden on over head cost as well as efficiency of  
using electric power equipment, Are Gasoline-powered equipment runs  
5-6 hours a day 6 days a week, It would be very frustrating with  
electric power equipment that is heavy cumbersome from battery  
weight and will not hold up to hours of service charge and abuse  
that we need to complete quality work that is demanded in the  
landscape maintenance services  
I would have use a gasoline powered charger to charge the battery  
equipment, this does not make sense Please do not place this burden  
on businesses and resend this law

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:40:55

No Duplicates.

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

First Name: Anthony  
Last Name: Barnaba  
Email Address: greenridge@cox.net  
Affiliation:

Subject: Gas Powered Equipment  
Comment:

With the present battery technology we have I would close up  
shop....period!  
It can't and will not work as it lacks both the power we need and  
run time we require.  
20 guys would lose their jobs and all the folks we do business with  
like the lawn repair shops would close.  
This idea is not feasible, period.

Attachment: "

Original File Name:

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

No Duplicates.

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

First Name: John

Last Name: McClenahan

Email Address: john@spmcclenahan.com

Affiliation:

Subject: Opposed to small engine ban (gas powered)

Comment:

Banning gas powered engines before there are adequate replacements will place a tremendous hardship all business of all sizes. Just in the tree care industry, we will not have adequate replacement for equipment. For example, we will not have saws large enough to cut large fallen trees and large dead trees. Currently there are not comparable electric alternatives in this broad small engine ban. Banning critical resources to maintain properties, the forest and infrastructure before replacement tools are available is very poor planning.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:14:57

No Duplicates.

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

First Name: Dan  
Last Name: Sumner  
Email Address: sumdan@sbcglobal.net  
Affiliation:

Subject: S.O.A.R. Proposed Changes  
Comment:

Hello C.A.R.B. Board,

While the currently available battery powered Outdoor Power Equipment is suitable for most Homeowners that maintain small in-town residential lots there is nothing currently available that meets the needs of Commercial Landscapers or large property owners with respect to 1) available power, 2) run time, or 3) affordability. Certainly the equipment that is on the market today is much better than what was available just a few years ago but for a User that needs to run a machine all day to earn a living what can be purchased right now just will not get through the day without many batteries and some way to charge them while working out in the open.

We need a distinction between the Residential Users and Commercial Users. The product on the market right now absolutely meets the needs of those folks working on their homes in-town so please go forward with restrictions to what they will be able to buy in 2024.

For hard working Landscapers, working all day every day to keep our state the beautiful one that it is, they need to let the OPE Industry continue to refine and improve the battery-powered equipment to come up with product that can truly replace the gas-powered equipment that they currently use.

Thank you for your consideration,

Dan Sumner

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:42:22

No Duplicates.

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

First Name: William  
Last Name: Trudeau  
Email Address: William@trudesigninc.com  
Affiliation:

Subject: Banning gas powered equipment  
Comment:

Should gas powered lawn equipment be banned.

The short answer is no. These governments mandate trends are nothing more than the government creating its own new market and agenda on the backs of hardworking people across the country.

The clear facts are we ban oil and gas production only to increase production from other parts of the world that don't even come close to the high environmental standards currently in use by the United States. Do let's have other countries that don't regard the environment produce oil and gas so we can feel better here in the muted states as if we have reduced the worlds carbon footprint.

Another analogy is our countries distain for suppressing people and human rights yet we have shipped our manufacturing jobs to places like China that are one of the worlds leading countries in human rights abuse. But American politicians can smuggly talk about our progress.

Ronald Reagan once spoke on appeasement and how it can only end in surrender or fighting.

So I say stand up for your rights now. Don't fall for the lies.

William

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:10:37

No Duplicates.

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

First Name: Michael  
Last Name: Utterback  
Email Address: mtutterback@gmail.com  
Affiliation:

Subject: Gas Lawn Equipment  
Comment:

Already using Many electric machines and they are better than gas. our Mean Green 60" Ride mower and 48" stand on mower have improved profitability significantly over gas and reduced maintenance time and expense. Our electric chain saws and hedgers are an improvement over their gas counterparts also. Reduced operator stress and PPE requirements are also beneficial.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:44:18

No Duplicates.



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

First Name: June

Last Name: Scott

Email Address: js@junescottdesign.com

Affiliation:

Subject: Gas powered lawn equipment

Comment:

Please ban gas-powered lawn equipment. I support the transition to electric ASAP for the sake of the planet

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:55:19

No Duplicates.

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

First Name: Pete

Last Name: Gluhaich

Email Address: pete@greenstreakls.com

Affiliation: Greenstreak Landscaping Inc.

Subject: Small off road Engines

Comment:

This communist/socialist proposal is bullshit. I can't even run a diesel truck that I paid good money for, for more than 1000 miles a year, with a new regulation. The California communists will eventually put a 100% tax on our profits to pay for this eco bullshit that is not proven, and that is what they are essentially doing. Down with governor Grusome. Keep doing what you're doing and not only will we be taxed to death, but the prices to retool will be passed on to the consumer.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 18:06:15

No Duplicates.

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

First Name: Steven

Last Name: Chau

Email Address: schau@3jlandscape.com

Affiliation:

Subject: Landscape equipment

Comment:

We think by year 2022 we need to use electric equipments for all commercial maintenance are not feasible.

Most of electric equipments can only operate less than 1 hour. Besides that the power of the equipments are not strong enough to mow nor blow. It will make the maintenance fees are high to our customers.

Steven Chau

J J & J Landscape Management, Inc

510 396 6945

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 18:19:29

No Duplicates.

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

First Name: Jimmy

Last Name: Fox

Email Address: jimmy@americansodfarms.com

Affiliation:

Subject: CARB

Comment:

2024 is too short of a time frame to ban small gas power equipment and try to replace them with electric or solar power. Two major problems, one is the electric power does not possess the power and diversity yet to replace some of the larger equipment. The second issue that seems to be ignored is the amount of batteries and disposal issues that will now be caused by an enormous amount of batteries that will be flooding the market.

We should continue to manufacture low emission engines and maintain new more efficient motors until the electric motors can fully replace existing equipment. 2028 should be a minimum target date.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 18:24:47

No Duplicates.

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

First Name: Brett  
Last Name: Graf  
Email Address: brett@habitat-gardens.com  
Affiliation: Habitat Gardens

Subject: Yes ban gas power tools ASAP  
Comment:

Yes I am a professional landscaper and I support the ban of gas power tools ASAP. Exceptions could include tools with low emissions and lower sound pollution.  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 18:32:27

No Duplicates.

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

First Name: Bryan  
Last Name: Hanson  
Email Address: hanson9969@sbcglobal.net  
Affiliation:

Subject: Gas engines  
Comment:

The end of landscape development and maintenance

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 18:36:08

No Duplicates.

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

First Name: Adam

Last Name: Jensen

Email Address: Adam.jensen@davey.com

Affiliation:

Subject: Gas powered equipment

Comment:

It would be completely irresponsible to ban all gas powered equipment. I understand limiting some pieces of equipment but there are so many aspects of tree work that require bigger and more powerful equipment. There would be so many dangerous trees that couldn't be removed without a large gas powered saw which would cause so much damage when it fails. Potential wild fires. Potential damage to private property. Potential harm to citizens. Not to mention the thousands of jobs that would be lost as work is eliminated. Not a well thought out move.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 19:03:37

No Duplicates.

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

First Name: Mike  
Last Name: Garcia  
Email Address: chocolatehq@gmail.com  
Affiliation: Enviroscope LA

Subject: Gas powered engines  
Comment:

I belong to the CLCA. Contrary to what most of my colleagues think, I wonder why the new law to outlaw gas-powered engines hasn't come sooner? Grass lawns are an extreme waste of water and the labor to maintain such is a total waste of manpower. I suggest replacing all grass lawns with native plants which are drought tolerant and sequester carbon better than grass could ever do. Native plants sequester carbon and keep it in the soil by encouraging mycorrhizal fungi to build out its structure made of carbon and keeping it in the soil, not in the air. Native plants are also food factories for pollinators and promote bio-diversity which is essential to the well-being of the soil food web for our planet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 19:02:07

No Duplicates.



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

First Name: Travis  
Last Name: Evans  
Email Address: Travis.evans@davey.com  
Affiliation: Davey Tree

Subject: Banning of Gas Powered Small Engines  
Comment:

I run a smaller office for a national tree care company. Our office prides itself in having the latest technology and best equipment. We have almost all new trucks and chippers. We use husqvarna battery chainsaws almost exclusively for tree pruning. That said, we still rely on the use of gas powered chainsaws greater than 45cc as the technology is not offered. We also lean on our gas equipment when working in remote locations, for fire abatement, and recharging batteries is not an option. A ban of gas chainsaws would bring our industry to a screeching halt. While I do feel that the technology will get there I think there needs to be adequate time for the industry to adjust. I appreciate the consideration.

Thanks  
Travis

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 19:03:38

No Duplicates.

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

First Name: Howard  
Last Name: Folkman  
Email Address: thegardenmaker@me.com  
Affiliation: CLCA life member

Subject: Responsible change  
Comment:

As with all aspects of humanity.  
Everyone and everything must change.  
If we are to continue as a species living on this planet.  
Anything that operates on fossil fuels must stop ASAP (now)  
And convert to a sustainable energy source.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 19:14:24

No Duplicates.

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

First Name: LUCA

Last Name: DONISI

Email Address: donlu19@sbcglobal.net

Affiliation: Donisi Landscape Construction

Subject: battery powered equipment

Comment:

In my opinion it is time our industry stop using gas powered equipment asap. The image of landscape companies can only benefit for embracing a more environmentally friendly way to conduct our work.

If we plan now on switching to electric tools, it will be done by 2024 without much financial pain. How many years does a mower or blower last when used daily? What about the less maintenance needed to operate electric tools? When factored in the equation it makes even more sense to switch.

In California we have had to adapt to a lack of water and learn about efficient irrigation systems and installing less thirsty landscapes or find another way to make a living. Working for cleaner air and a better environment is no less important and well worth the initial investment. After all we are in the GREEN industry!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 21:00:26

No Duplicates.

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

First Name: Shane

Last Name: White

Email Address: shane@kndlandscaping.com

Affiliation: K and D Landscaping, Inc.

Subject: Gas Powered Ban-Small Engines

Comment:

We are all about transitioning to battery and more eco-frinedly options for equipment but the current timeline proposed for this ban is just not reasonable. The technology is not ready for us contractors to successfully perform our work with this equipment. The financial impact of this transition is also very large and would put major stress on our businesses and may even put some businesses out of business.

We need more time and a better plan to absorb the cost implications of transitioning our equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 21:32:46

No Duplicates.

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

First Name: James

Last Name: Antonowitsch

Email Address: Jimhoyt@cox.net

Affiliation:

Subject: Gas lawn equipment

Comment:

70% of the pollution in the world comes from two countries China and India they burn coal and are responsible for the environment the way it is unless a change it's a waste of time for us to change and only make two or 3% difference in the world !!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 21:36:18

No Duplicates.

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

First Name: Steve

Last Name: Wong

Email Address: Altlandscapes@yahoo.com

Affiliation:

Subject: Ban on gas blowers and equipment

Comment:

As a licensed landscape architect and contractor I support a ban on sale and use of gas powered landscape equipment by 2024. This ban would not only help reduce carbon emissions but would also reduce noise pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 21:24:12

No Duplicates.

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

First Name: Richard  
Last Name: Sullivan  
Email Address: Enchplant1@yahoo.com  
Affiliation:

Subject: Gas powered landscape equipment  
Comment:

Yes I think they should all be banned and only electric or battery  
powered allowed from now on

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 02:56:18

No Duplicates.

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

First Name: Jeff

Last Name: Herold

Email Address: Jeff.herold@brightview.com

Affiliation:

Subject: www.arb.ca.gov says

Comment:

Based on Current technology and productivity of battery powered small equipment this would bring a major cost and quality burden to my business. Give technology a few more years and we will see battery powered equipment advance to a point that this initiative could be successful. I also know the stat is not prepared to handle the disposal of spent batteries in a proper manner at this time as well

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 05:18:16

No Duplicates.



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

First Name: Mark

Last Name: Gardner

Email Address: mgardnerslandscaping@yahoo.com

Affiliation:

Subject: Electric Equipment

Comment:

With the cost and weight of the electric equipment at this time it takes us longer to do our work. This leads to more cost for our clients. If the batteries do not improve the extra cost could potentially be to expensive for some clients and companies.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 05:31:05

No Duplicates.

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

First Name: Lupe

Last Name: Espinoza

Email Address: lespinozajr@live.com

Affiliation:

Subject: Bann gas powered equipment

Comment:

No I don't think they should be banned, you would still need to use  
a gas generator to charge batteries on electric equipment

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 05:42:48

No Duplicates.

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

First Name: kent

Last Name: lacin

Email Address: kent@lacin.com

Affiliation:

Subject: Regulations to small off-road engine regulations

Comment:

Sacramento is a city of trees. Also it is a city of leaves. But all year long, you can hear the drone of leaf blowers everywhere, any hour of the day, and sometimes, night.

They are polluting. I can smell the gas exhaust as I ride my bike past them. They create very dirty air, especially in the dry summer, when dust mixes with exhaust fumes. Apparently an hour of gas-powered leaf blowing puts as much pollution in the air as a car trip from here to Denver.

They are loud. Their drone keeps people from opening their windows. Their drone drives away birds and other small creatures. They create a dead zone as everything moves away to avoid their obnoxious effect.

Leaf blowers and other small gas-powered tools are obnoxious, unhealthful and dangerous for the environment. Many can be replaced easily with their electric-powered counterparts.

For the sake of common sense, peace and quiet, and the survival of the planet, please take this small step, and regulate the use of gas-powered engines! Thanks so much.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 06:22:00

No Duplicates.

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

First Name: Cheryl  
Last Name: Fields  
Email Address: cheryl@socallandarch.com  
Affiliation: ASLA

Subject: Proposed Ban on Gas-Powered Small Off-Road Engines  
Comment:

I believe that the proposed ban on the sale of gas-powered small off-road engines, beginning in 2024, is a wise and necessary measure. The regulations do not, and should not, prohibit the use of existing gas powered small engines. If it did that would represent a significant hardship to many landscape maintenance companies as well as residential homeowners. Creating a hard deadline and getting the word out NOW will ensure the preparedness of the users and the manufacturers.

Perhaps the \$30 million proposed allocation to help with the transition from gas to electric could be in part used to incentivize the creation of better battery technology, a battery allowance, and or homeowner rebates (largest user segment).

Waiting for technology to arrive delays this necessary step, both incidentally as well as purposefully. Drawing a hard line in the sand with a reasonable cut off date of 2024 ensures continued diligence to perfecting the technology. Don't let up.

I support the proposed ban on the sale of gas-powered small off-road engines, beginning in 2024.

Thank you,  
Cheryl Fields, ASLA  
Senior Landscape Architect

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 06:30:16

No Duplicates.

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

First Name: Richard  
Last Name: Boynton  
Email Address: allthingsgreen1@att.net  
Affiliation:

Subject: Gas powered small landscape machinery  
Comment:

It's bound to happen some time, let's just get it over with.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 07:26:54

No Duplicates.

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

First Name: Laurie

Last Name: Levine

Email Address: laurielevine2@gmail.com

Affiliation:

Subject: Transition to Zero Emissions for Small Off-Road Engines

Comment:

I am in favor of the regulation for transition to zero emissions for small off-road engines. The air and noise pollution of these in the landscape industry must be mitigated by finding alternative resources for equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 07:27:08

No Duplicates.

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

First Name: Carl  
Last Name: Clifton  
Email Address: carl@lawnscape.com  
Affiliation: LAWNSCAPE SYSTEMS

Subject: Small Gas Engine Ban  
Comment:

Commercial (for profit) Landscape Maintenance Companies can NOT make battery equipment work. The average 4-man landscape crew would have to carry over 20 lithium batteries per day in order to service properties. This does not work. Homeowners on the other hand COULD be make battery powered equipment work.

This is just another in a long list of California Business Killer regulations.

Zero Emissions will not work in Commercial Landscape Maintenance.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 07:57:11

No Duplicates.

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

First Name: Peter  
Last Name: Dufau  
Email Address: dufauland@aol.com  
Affiliation:

Subject: Small Engine Ban CARB  
Comment:

I've been a landscape contractor for 30 years. While we have embraced battery landscape equipment, there are applications where the technology is not yet close to practical or replaceable. Medium to large chainsaws; The power needed to weight ratio of battery power makes it impossible to move safely while working, even backpack battery don't have enough runtime and also add operator loose of balance and fatigue. Lawn mowers; the weight added by battery's sufficient to operate large mowers creates soil compaction problems and requires frequent charge or change outs that make them impossible to use commercially or institutionally. While battery Backpacks solve some power longevity problems, they add fatigue, safety, heat stress and cost issues (over \$1000.00 each). Firefighters, Licensed tree & landscape workers need exemptions from this ban to safely be able to take care of our urban environment until suitable, plausible equipment is available.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 07:53:05

No Duplicates.



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

First Name: Roy  
Last Name: Hisler  
Email Address: roy.hisler@davey.com  
Affiliation:

Subject: Outlawing gas powered tools and equipment  
Comment:

You just can not pass a law without realizing the ramifications of your actions. Battery powered equipment are great in certain situations but they can not complete jobs we are given. We use them now whenever we can. One concern is the manufacturing and disposal of the batteries. Please do not pass this law!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:15:38

No Duplicates.

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

First Name: Darren

Last Name: Feenstra

Email Address: dfeenstra@lbcc.edu

Affiliation: Long Beach Community College

Subject: Impossible to do the job without gas

Comment:

It would be impossible to get the job done here at LBCC. We need an ABSOLUTE MINIMUM of a solid 12 hours of constant power to operate and maintain operations and facilities. We have already partially converted to battery power. It just does not have the ability to run and sustain the consistency that is needed.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:22:52

No Duplicates.

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

First Name: John

Last Name: McCabe

Email Address: john@mccabesnursery.com

Affiliation: McCabe's Landscape Construction

Subject: Another example of how government is not paying attention to the impact on business

Comment:

This new proposal for gas powered equipment is another example of how government is not paying attention to small business. For two reasons. First a lawn service business will not be able to function without gas powered vehicles unless they buy thousands and thousands of dollars worth of batteries to operate this business. Anyone that has used an electric blower knows that it requires multiple batteries just to do one house. They use a lot of electric power. Each battery is in excess of \$100. So if a small company is doing 20 houses a day you will need \$2,000 for each worker on the crew.

But the second part of this is now you are creating toxic metal contamination for when these batteries go bad in two years. Then these batteries will need to be replaced again at another \$2,000 per man.

Third is why doesn't our government think these things through? How much of the electricity that is used in these "electric machines" are using electricity made with fossil fueled powered electric plants. Is this all smoke and mirrors to make it look good to the public but not really making changes at all? You are still using fossil fuels to make the electricity.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:21:15

No Duplicates.

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

First Name: Jason

Last Name: Marcus

Email Address: jason.marcus@centrescapes.com

Affiliation:

Subject: Gas powered equipment

Comment:

This new law would be devastating to small business landscape owners. The financial burden this would require to take on all new battery equipment along with the electrical outlets needed to power this equipment is beyond comprehension. Just few thoughts - the amount of batteries required would be shortage nationwide, repair shops could not handle repairs, outlets needed at shops and on trucks. Also imagine all the companies and homeowners charging batteries everynight.

Please reconsider

small business owner

Jason Marcus

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:25:29

No Duplicates.

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

First Name: mark

Last Name: oliver

Email Address: markoliver@evergreenlandcare.net

Affiliation:

Subject: gas powered equipment

Comment:

Our messed governor is trying to put us out of business by banning gas powered equipment .Unfortunate we were unable to recall him. Maybe he really got GBS from his covid booster shot . The Lord works in mysterious ways . Please recall the ban of gas powered equipment because it will cause an undue hardship on my and my business .

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:25:52

No Duplicates.

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

First Name: Martin

Last Name: Schaefer

Email Address: martins@crestviewlandscape.com

Affiliation: California landscape contractors Associa

Subject: Outlaw of gas powered landscapig equipment

Comment:

In response to the proposed new regulations we have been incorporating battery powered blowers and lawn mowers into our landscape maintenance operations over the past 3 years . These are applicable to small projects where the service is only an hour or two and is applicable to Homeowners not commercial use. We have found that battery technology has not yet caught up to this type of equipment. For those properties that request battery operated equipment there is a increase in cost of equipment and labor pasted on to the consumer. I believe that the time table of 2024 is to short and will negatively impact our business as equipment costs rise. More time is needed for the equipment industry to implement battery technology into their equipment that will provide cost effective equipment with better battery life. Suggest that this be rolled out to all residential equipment and eliminate the sale of gas powered equipment to the homeowner as a first step.

Attachment: "

Original File Name:

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

No Duplicates.

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

First Name: Tyler  
Last Name: Slade  
Email Address: tyler@sladeindlandscape.com  
Affiliation: VP

Subject: Electric Equipment  
Comment:

Asking companies to use electric equipment for commercial use would be an absolute disaster. Not only will it be extremely expensive but the electric equipment available is not powerful enough for commercial use. This would devastate our operations and ability to perform the work we have been hired to do.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:50:11

No Duplicates.

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

First Name: Thomas  
Last Name: Van Denend  
Email Address: tomvd@faswall.com  
Affiliation: ShelterWorks Ltd.

Subject: ban of gas motors for landscape industry.  
Comment:

I am in favor of the ban of internal combustion engines for small engines as they disproportionately emit more pollution. Obviously must have alternative motors fully in place to minimize business disruption.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:53:05

No Duplicates.



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

First Name: Cheryl  
Last Name: Cole  
Email Address: labatstree@gmail.com  
Affiliation: Labat's Tree Care

Subject: DONT BAN GAS EQUIPMENT  
Comment:

I am in the tree and landscaping business, tHERE IS NO WAY TO DROP  
A 200 FOOT TREE WITH A BATTERY CHAINSAW, ITS JUST IGNORANT TO THINK  
SO, THE FACTORIES MAKE FAR MORE NOISE THAN A CHAINSAW, YOU ARE  
HURTING MORE PEOPLE THAN HELPING ANYTHING SO STOP THE CRAP AND  
FOCUS ON THE PEOPLE OF AMERICA AND MAKING THEIR LIVES BETTER FOR  
ONCE INSTEAD OF CONTINUING TO HURT EVERYONE BUT YOURSELVES.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:54:00

No Duplicates.

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

First Name: james  
Last Name: bailey  
Email Address: jbailey@goldrush.com  
Affiliation:

Subject: Bill AB1346 Ban of Small Engines  
Comment:

I am concerned about a clean environment; HOWEVER this bill is misguided, and does not address the many workers who need commercial pressure washers, as my family does for their income.

Please consider an exception for commercial pressure washers with ICE.

Thank you

Jim Bailey

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 09:29:31

No Duplicates.

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

First Name: fleur  
Last Name: nooyen  
Email Address: fleur@fleurnooyen.com  
Affiliation:

Subject: gas blowers  
Comment:

I am super happy about this new law and I wish it would have happened years ago already. I am willing to pay more for electric power equipment - the gas powered equipment is making the earth and all the inhabitants choke.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 09:29:41

No Duplicates.

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

First Name: William  
Last Name: Hildebrand  
Email Address: biz@hildland.com  
Affiliation:

Subject: Transition to Lower Emissions  
Comment:

I have been a licensed landscape contractor for more than three decades. I whole-heartedly support transitioning from gas power to electrical for small equipment, such as blowers, mowers, hedge trimmers, etc. Not only are the current machines bad for the environment, they are bad for people operating them. The noise and emissions are awful.

Opponents of this measure insist it is between battery and gas powered machines. Battery life is a legitimate concern. When practical, a corded machine is a viable alternative, as is charging an extra battery or two at every stop. Increased demand for the technology should result in innovation, increased efficiency and price competition, much as it has with electric cars. Over time, I doubt many will miss paying for gas, oil and other maintenance not required by electric motors.

An incentive/buy back program, possibly something like the "cash for clunkers" (CAP) program to help with upfront costs, accurate data on the lower costs of running electric equipment might help ease the concerns of some. Another fact to mention is clients, just about all clients, cannot stand gas leaf blowers and other loud equipment. You can sell the transition to your clients as something not only good for the environment but good for their peace of mind.

Smart landscape professionals will turn this to their advantage.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 09:17:12

No Duplicates.

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

First Name: Bernard

Last Name: Karmatz

Email Address: bestevergreen@yahoo.com

Affiliation: Evergreen Landscape Maintenance

Subject: Transition to electric landscape equipment

Comment:

This 2024 transition that bans gas powered lawn equipment will have a significant impact on the many smaller operators of local landscape maintenance companies. There is a concern regarding access to electrical outlets and maintaining charging of batteries as may become necessary. Significant financial grant assistance will be required for the smaller companies who have already been impacted by the pandemic and the associated loss of business.

Post Office Box 796, Claremont, CA 91711-0796

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 09:52:23

No Duplicates.

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

First Name: Al

Last Name: Ancira

Email Address: alsirrigation@yahoo.com

Affiliation:

Subject: Answer to gas powered equipment in California

Comment:

I do not believe it is in the best interest of any landscaping company to allow our government to take away the use of gas powered machines in California. Battery operated equipment at thisPoint is not sustainable. We can review this in the future but at this point no it is not a good idea.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 10:16:36

No Duplicates.

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

First Name: Raquel

Last Name: Lopez

Email Address: queens609@yahoo.com

Affiliation: Queens Lawnmower Shop, Inc.

Subject: Oppose proposition to transition to zero emission

Comment:

We have been in the business of landscape and gardening repair equipment for the last 20 years. We have been providing service to small companies and individuals in the gardening industry. They have been our main business structure and they have been concerned about this new law and most of them have been commenting about moving to another states to continue their business or moving to another country. This law will not only affect our business but our small community which most of our customers are hispanics and their main resource for income is their gardening work. They are concerned about all the money they have to spend in batteries for their equipment since they sometime spend more than an hour with a gas powered blower on a single job and the only powered leaf blower available the battery only lasts 45 min to an hour so they will have to buy like 6-7 batteries which run over \$1000 each and they will have to make sure they charge them every night and have to buy a charger for each of them which also run over \$150 each. This is going to make our customers consider moving to another states where they can still continue with their work. If our customers start doing this I will have to let go of my employees and will have to close down my business after 20 years, please consider all these concerns from my customers and from my employees. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 10:13:56

No Duplicates.

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

First Name: Cassy  
Last Name: Aoyagi  
Email Address: cassy@formlainc.com  
Affiliation: FormLA Landscaping, Inc

Subject: Gas equipment  
Comment:

I dream of the day Landscaping is truly greening including all electric fleet and equipment! This is the future....and we should be seizing this moment to lead our industry and gain the accolades our industry's stewardship is undervalued for. Let's do this!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 10:38:32

No Duplicates.



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

First Name: Tina  
Last Name: Cremer  
Email Address: tina@h2xero.com  
Affiliation:

Subject: Gas powered landscape equipment  
Comment:

Yes. Gas powered landscape equipment should be banned immediately.

For 10 years, my small but profitable maintenance company used hand held battery powered equipment. We carried extra fully charged batteries with us. The equipment did not harm our ears, irritate clients/neighbors, cause lung damage due to the fumes, endanger our environment, and the air just smelled better. The equipment was light and powerful enough to do everything we needed except to blow off heavy wet mowed grass or heavy wet soil. we used rakes, brooms, and shovels for those tasks if necessary.

Our environment and our careers are in jeopardy because if it gets too hot and dry for plants to survive, we will not have a landscape industry. Currently, there are even desert plants that are dying due to excessive heat and lack of minimal water.

Unless all of us are inconvenienced to slow the climate crisis, even if it is expensive, we will have a planet on which we don't want to live or on which we can not live.

Currently, not one major country on earth wants to spend the money or be inconvenienced by changes that will enable the continued existence of our children, grandchildren, and all of the children on earth to live in the world as we know and love it.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 10:21:25

No Duplicates.

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

First Name: jerry

Last Name: hanson

Email Address: jerry@hansonpalms.com

Affiliation: ACLA TNLA Nevada landscape assoc.

Subject: use of battery powered leaf blowers, battery powered mowers and weedeater tools

Comment:

with over 50 years experience in california landscape care our company Hanson Palms llc wanted to voice our opposition to not only the extreme shortness of time to change over to all electric equipment but the basic misunderstanding of commerical care of landscapes in california . Point 1 there are no battery powered equipment that are capable of being carried by a single person that will function as a replacement for gas power backpack blowers, The units would be extremely heavy, require charging stations that are mobile on the trucks and be 30 % more expensive min. Point 2 other equipment such as parking lot sweepers, which are gas powered cannot be used because of the size of the machines prohibits their use in small areas . Point 3 there is currently no equipment available to mow large pasture like areas of turf or clean up cramped small areas . How can the state of California impose replacement guidelines when there is no alternative equipment available.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 10:22:56

No Duplicates.

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

First Name: Alan

Last Name: Day

Email Address: alan@ladybuglawn.com

Affiliation: Ladybuglawn

Subject: Electric vs. Gas Landscape equipment

Comment:

While the goal of reducing emissions by eliminating gas powered landscape equipment is worthwhile, the alternative technology just does not exist that would be powerful enough and cost effective enough for commercial maintenance applications.

For example: we have typically in each of our commercial landscape maintenance trailers two each gas powered: blower, mower, hedge trimmer and string edger. Eight pieces of equipment that on average are used about six hours a day each, that's 48 hours of run time needed. Equipment that is powerful and can deal with 105 degree heat, cold near freezing, rain, UV, wet heavy leaves, wet lawns very efficiently.

For the alternative equipment battery life is all over the place and often what's listed is best case, not taking into account that heat, cold, exposure to rain and UV, heavy power drains like wet leaves or wet grass all reduce battery life and battery power (battery power is not constant like gas power) very quickly. So for our eight pieces of equipment used about six hours a day each we would need on board at least how many batteries? Dozens ... with a charging/holding rack that could hold them.

We'd need a new trailer for our trailer to handle the extra weight and charging racks, not practical, and at how much additional cost if it was? Or we load it all onto the pickup truck and since it has to be protected from the elements and theft, we lose the storage/hauling capacity of the truck. Then we need additional separate trucks and crews for hauling, what are the costs both financially and to the environment, to all the extra trucks and trailers? Very, very significant.

As for charging ... out trucks run for maybe five minutes as we go between accounts, then they sit idle/not running when they at an account for thirty minutes or more. Could all those batteries be recharged for the next day given those short run times between accounts? Or would we need a whole separate, massive, charging station at our small storage yard? By the way, we don't have extra room for a charging building (has to be indoor, can't be exposed to the elements or theft), or even electricity for that matter, at our storage yard. How would we do it and at what very significant capital investment costs?

What about overall battery life? Not long I suspect with all that heavy use, in extreme conditions, a few months to a year? So now you are talking about millions upon millions of dead batteries

annually, that have to be replaced frequently at large cost ... and that are potentially toxic in and of themselves. Maybe half get properly recycled ... but the other half are going to end up in the landfills. What's the cost, both financial and environmental, to that?

How will this rapid forced change affect the one person commercial operation? The small operation with a couple of crews? The larger operations with fleets? How will the many significant costs, and these are not incremental costs, get passed on to the consumers?

So, while the goal of reducing emissions is worthwhile it does not appear that this has been thought out, researched or studied. And it needs to be studied in the field, over time/several years in different seasons and weather conditions and on the scale needed. Please do so before implementing any mandates.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 10:56:58

No Duplicates.

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

First Name: Deborah

Last Name: Yturralde

Email Address: Hipponparadise@hotmail.com

Affiliation:

Subject: Gas powered equipment ban

Comment:

Greenworks battery powered equipment worked great for as long as I was able to charge the batteries. However, the company is in Canada and problem solving with that company is next to impossible! I now have a group of Greenworks tools that are inoperable because I can't get the batteries charged or buy new ones. I really liked the ease in usage while I had battery power, though. The equipment needs to be more accessible if it's required.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 11:13:44

No Duplicates.

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

First Name: McKayla

Last Name: Benites

Email Address: cavalleylan@sbcglobal.net

Affiliation:

Subject: Gas-powered Equipment and a Small Business

Comment:

To Whom It May Concern:

As a family-owned business with less than 8 employees, we already face a plethora of hurdles struggling to stay afloat, especially in the midst of a pandemic.

Prices of materials and supplies are surging while our ability to pass costs along to customers is diminishing; projects bid on are no longer profitable just weeks later. Unlicensed individuals and large landscape companies are at an unfair advantage of reducing or absorbing costs when bidding projects. The daily operations are becoming too expensive to maintain when all we are trying to do is keep our business open with integrity and hard work as the backbone of our operations. All we strive for is to contribute to our community and make a living for our family and employees we view as family. Some days, it feels like one more hardship may just be the final straw that puts us under.

With the mass circulation of information regarding the potential ban on purchasing new gas-powered equipment as early as 2024, our small business cannot help but feel an overwhelming sense of dread and fear for the obstacles this ban would implicate.

As a commercial landscape provider, our staff meet onsite our yard each morning to clock in. From there, they embark on 8 hours service routes ranging from 5 to 50 miles away from home base. During that time, even the simple task of finding a restroom to use can be difficult. With possible bans on new gas-powered equipment, we now will need to figure out ways to charge all of our equipment, while still remaining profitable, without causing an inconvenience to our customers, and to do so with limited resources as the technology that has been developed for the commercial landscape industry is severely lacking. The availability of affordable equipment that can hold charge long enough to support a full day of use does not exist nor does the equipment necessary to charge that equipment.

As a member of this community, we are not opposed to the need for advancements, change, and taking direct responsibility towards working as a "greener" company. We instead are terrified of how to continue operations during a time of already exponentially increasing costs and dwindling profits while transitioning to a new technology that just hasn't had the proper research and development.

Ultimately, we are asking...begging... that additional time be given and that additional resources be allocated towards the development and expansion of "green" technology so that we can all make this transition in a way that is efficient, affordable, and supportive to everyone in our community.

We ask for fair and genuine consideration so that small businesses, families of our community, can survive.

Respectfully,

McKayla Benites

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 12:00:33

No Duplicates.

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

First Name: Alan

Last Name: Wheat

Email Address: wheatlandscaping@gmail.com

Affiliation: Alan Wheat Consulting

Subject: Absolutely gas tools should be 95% banned

Comment:

Absolutely gas should be 95% banned. Ive been fully battery operated on myself and crew for 2 years now. Its been amazing.

- I no longer have to buy gas and oil, and have leaky cans in trucks and vans.
- Nobody can ruin a tool by mixing gas wrong saving me thousands in lost equipment. Not only bad mixing kills tools, but creates more smoke when done wrong.
- Once you have battery and chargers. Additional tools cost less money.
- You can use customer supplied power, which is often solar.
- I've added solar to one vehicle and we never have lack of battery charge.
- Less sound and noise pollution for my customers
- Less sound for my crews ears, no exhaust in they're lungs. Healthier for them and the planet.

The only reason gas should be used is huge weed eating and fire clearance work. The batteries just don't have the capacity for acres of mowing.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 13:31:08

No Duplicates.



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

First Name: Tina  
Last Name: Cremer  
Email Address: tina@h2xero.com  
Affiliation: clca

Subject: Small Off-Road Engine Regulations: Transition to Zero Emissions  
Comment:

Yes. Please make this transmission to zero emissions at soon as you can. It is urgent. Our children and grandchildren need a pretty and friendly climate to live in.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 14:01:02

No Duplicates.

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

First Name: Marty  
Last Name: McClung  
Email Address: marty@westernmower.com  
Affiliation: Western Mower & Engine

Subject: Difficulty for proposed small engine ban  
Comment:

I have operated a small engine sales & repair business since 1984 and have 5 employees with thousands of customers who depend on the small engine industry. I first want to say I am concerned about our environment and want to do my part in keeping it clean but I also know banning all small engines by 2024 is not really feasible with the technology in place now or by 2024. All of the brands we represent have been designing new and environmentally conscious equipment but some products cannot be replaced with electric power.

Here are some concerns listed:

Among the problems of using battery powered commercial landscape equipment, there are:

- issues related to charging many batteries such as fire hazards to a facility
- limits of electrical circuits in a facility
- limits of power availability to a facility that would be charging at least 1,000 batteries for 50 landscape crews in 1 day (assuming mowers, blowers, etc would all be using batteries, 20 5ah batteries per crew which is a bare minimum, not mowing much grass)
- limits of personnel to work overnight to rotate batteries
- limits of "peak hours" where electricity is rationed exactly when landscapers would need to charge many batteries in the evening
- inability to continuously generate electricity from a gas powered generator in an emergency

We have been involved with homeowners and business owners that suffer from power loss, fires, flooding and other losses and our gas powered small engine equipment has been a life saving resource to help them! This cannot be taken lightly.

There are also thousands of workers that depend on small engine equipment to make a living and yes beautify California some would suffer huge financial losses if this ban goes into affect on 2024.

I would suggest our government looks for more information on implementing electric power for small equipment and will talk with industry leaders in our field to see if the proposed restrictions will work.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 14:14:34

No Duplicates.

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

First Name: Fred  
Last Name: Gonzales  
Email Address: fred.gonzales@dmsfacilityservices.com  
Affiliation:

Subject: Small Off-Road Engine Regulations  
Comment:

Good afternoon,

I am a general manager for a landscaping company, and to think chances of this happening in just two years makes me quite nervous. My comment will be considering the power outages we already experience today plus adding what can consequently come from this could be a headache to many of us in this industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 14:40:33

No Duplicates.

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

First Name: Nicholas  
Last Name: Monter  
Email Address: nmonter@stotzeq.com  
Affiliation: Stotz Equipment

Subject: Liquidation of existing inventories  
Comment:

Once the new laws are in effect, will a vendor/distributor/retailer be able to retail existing/remaining inventory that was manufactured prior to the enactment date? Will there be total horsepower fleet levels similar to the off highway diesel & stages to become compliant? Does CARB have a recycling program for lithium batteries in place or in process to support the anticipated battery population growth?  
Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 14:46:40

No Duplicates.

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

First Name: Spencer  
Last Name: Carlton  
Email Address: scarlton@lusagroup.com  
Affiliation: LUSA Holdings, LLC

Subject: 2 cycle equipment emissions  
Comment:

I believe the added costs of inhibiting the use of 2 -cycle equipment by 2024 will cause more emissions and hardship for the users of this equipment. I have a background in commercial licensing of lithium ion battery technology and believe I have sufficient understanding to have a real opinion.

Current electric equipment technology is not sufficient to reliably use in the landscape industry. The material science in the batteries is not yet capable of holding a sufficient charge long enough and deliver enough power to satisfy the typical landscaper. The balance of weight, cost, life and load is not yet appropriate for our use.

Thus forcing companies to use inferior technology too soon will only increase the number of batteries, pieces of equipment needed to be purchased, all drivers of carbon emissions, while also increasing drive time for crews, mechanics and repair shops trying to support each crew in the field.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 15:13:29

No Duplicates.

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

First Name: manuel

Last Name: meza

Email Address: manuel@mezagardens.com

Affiliation: Meza Landscape Management

Subject: gas powered landscape equipment

Comment:

Currently battery powered equipment and electrical equipment can't compete with gas powered equipment in terms of power, output, and efficiency.

if landscape companies are not allowed to use gas powered equipment, we would have to raise our rates. if gas powered equipment becomes illegal in the state of california, the only way this can make sense is to fine homeowners who contract with contractors who use gas powered equipment.

if pollution is the issue, then we need to look beyond landscape equipment and look at the vehicles we use, particularly diesel powered trucks that haul and deliver goods.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 19:53:45

No Duplicates.

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

First Name: ollie  
Last Name: goff  
Email Address: cars4uandme@gmail.com  
Affiliation:

Subject: GAS EQUIPMENT  
Comment:

GAS IS MORE POWER, MAYBE TIME TO GET OUT OF THIS BUSINESS.SO NEXT  
NO CARS TOO  
THINK ABOUT THIS.....

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 08:53:38

No Duplicates.



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

First Name: Jim

Last Name: Conway

Email Address: jcpowerequipment@comcast.net

Affiliation: small engine tradesman, shop owner, tech

Subject: reconsider small engine

Comment:

To whom it may concern,

I think that it should be regulated, granted. By the county and needs of said counties. Highly treed counties with lesser population should be exempt. The very tools that are used daily to survive in these counties are being affected by this proposed amendment. People that use wood to heat their homes = you suckers just freeze.

loggers that help thin and manage the forests, What will they do for work? Loggers are a special breed of people we need those people to be in the woods where they are happy and thrive. The monies that the government has taken and supposed to allocate towards thinning and maintaining the overgrowth needs to be sent to just that. Too many years of neglect by the politicians has lead us into another political scam of climate change. If the money taken from the American people was spent and proportioned adequately our California wild fires would have not killed so many innocent people.

the forests have been neglected for decades that is evident. Our future goals should include thinning of federal and county forests with the highest regard. Tools used to do this very job should not and can not be taken away.

In conclusion,

Healthy trees clean and make oxygen that all mammals breath. Healthy forests that are kept up and funds spent properly on programs to do just that. Help us mammals breath fresh clean air. Trees clean air quality every day that they are alive. When controllable wild fire are allowed to destroy millions of acres of uncleaned forests that is a shame. We have the resources we have the people we have the equipment we have an amendment that will end all of this! This is a bad amendment towards the health of humankind. Reconsider per county, per sq acre of forest, per population, it can be done with honest non bought politicians. We the people want our voice heard we are the funds that pay the way for politicians and we want our money spent differently!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:47:40

No Duplicates.

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

First Name: Mark

Last Name: Mathis

Email Address: wildwoodsaw@sbcglobal.net

Affiliation:

Subject: Small Gas Engine Ban

Comment:

This is nuts. Has anyone thought of the far reaching effects this will cause. How many more jobs need to be lost? We need common sense to come back to California!! We all vote and this will drive all of us to the polls to get rid of any politician that supports this.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:39:03

No Duplicates.

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

First Name: Chris  
Last Name: Saxton  
Email Address: chriss@pacelink.com  
Affiliation: business owner

Subject: Carb zero emission gas engine ban  
Comment:

To whom it may concern,  
the technology does not exist to ban all gas engines and will not  
in 2024. you will simply force those with no solution out of  
business in your state. Yes in the handheld market there are  
solutions that are improving. in the construction market which  
will no doubt be active with the infrastructure bill there is none  
at this time fo many of the gas powered units used in  
construction.

it is also an issue in turf care as well. it would seem to be  
premature when there is no replacement in many cases. not to  
mention that the power grid in California has been challenged  
already.

lastly, where does lithium mining and the disposal of batteries do  
to the environment. it sounds great to go battery but it is still  
a long way off before it is available in all products and not a  
biohazard for disposal.

there is room for emmissions improvement going forward and a common  
sense tiered approach will be a better path for all.  
thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:22:06

No Duplicates.

**Comment 111 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: jorge  
Last Name: sanchez  
Email Address: jorge@sdwel.com  
Affiliation: CLCA

Subject: Proposed Rule Would Ban Gas-Powered Equipment  
Comment:

We are asking that CARB allow gasoline-powered commercial grade landscape equipment to be sold until at least 2028, so equipment can be further developed, costs can come down and supply chain issues be solved.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:18:01

No Duplicates.

**Comment 112 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: curt

Last Name: bruce

Email Address: cbruce9289@aol.com

Affiliation:

Subject: Off-Road Engine Regulations

Comment:

This law will put hundreds if not thousands out of business. From repair shops to lawn maintenance personell, all will suffer. Batteries powering lawn equipment will rarely last long enough to complete the smallest job.

Think about what school districts and municipalities will do to maintain the vast amount of public spaces if they have to use only battery powered equipment.

This is a noble but terribly impractical idea. Send it to the trash bin.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:19:46

No Duplicates.

**Comment 113 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gregory

Last Name: MacDonald

Email Address: gmacdonald@carson.ca.us

Affiliation: City of Carson, Tree Maint. Supervisor

Subject: Transition to electric equipment

Comment:

I believe that the need for equipment that can perform for a 10 hour day will not be readily available at reasonable pricing for municipalities to be able to continue to offer emergency response services. Currently, the need for in-field charging means that either our gas or diesel trucks or generators will need to be run to facilitate charging batteries. Will generators be exempt? There will be an on-going need to generate power to charge or run electrical equipment in the field. Public safety depends on it.

I don't think our electrical infrastructure can handle the increased demand.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:08:54

No Duplicates.

**Comment 114 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bradley  
Last Name: Cavalier  
Email Address: Bradley.Cavalier@cdcr.ca.gov  
Affiliation:

Subject: gas powered tools  
Comment:

As much as I believe the requirement to replace gas powered equipment to battery powered may be a burden for some by outlay of additional cost, I feel it's necessary to move in this direction. We are at a forefront of making change and the landscape industries is no different. I'm curious if there would be available a buy back program that could help offset some of the burden? Three years seem fair enough to give companies time to make change and transition over this period. Our environment is so important, and the green Industries can be a leader in doing something that will affect the world.

Thank you, Brad

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:11:12

No Duplicates.



**Comment 115 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Magda

Last Name: Lane

Email Address: lanescapes.la@gmail.com

Affiliation:

Subject: Consider Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero

Comment:

I have been using battery-powered blowers for the last 10 years when the City of Santa Monica introduced their ordinance. These blowers are quieter and you don't smell the gasoline fumes in the air, particularly when multiple companies are servicing clients on the same days throughout the weeks. There is also less fire danger using battery-operated blowers when red zone ordinances are in effect.

I think there should be some funding available to help smaller companies transition to gas-powered leaf blowers as well. The batteries are the most expensive part of the equation and the higher the wattage, the more expensive. They also need to have multiple batteries and chargers that charge quickly so that the same number of clients can be serviced on their regular schedules.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:53:26

No Duplicates.

**Comment 116 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jeremy  
Last Name: Van Groningen  
Email Address: twistedmetal4x4@gmail.com  
Affiliation:

Subject: Small engines  
Comment:

Any efforts to eliminate small engines should be abandoned. There are much more productive ways to mitigate carbon emissions such as proper Forest management. Small engines are a drop in the bucket of emissions compared to the hundreds of thousands of Acres of forest burned. Legislation like this costs residents of the state millions and millions of dollars. California is becoming less friendly to the poor and working-class people.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:52:10

No Duplicates.

**Comment 117 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Juli

Last Name: Hofmann

Email Address: jhofmann@redshift.com

Affiliation: Monterey Peninsula College HORT Dept.

Subject: Gas Powered Equipment Sales Ban

Comment:

It is LONG past the time to end the use of these highly polluting devices - many of which are used in landscaping. Alternatives exist and the state is offering incentives such as funding for electric blowers. Change is never easy but economies will adapt to meet the need for the greater good. Postponing or delayment does not solve the larger air quality problems - only kicks the can up the road.

I support the ban and look forward to a greener future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 11:14:22

No Duplicates.

**Comment 118 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ryan

Last Name: Johnson

Email Address: Ryan@parklandscapemaintenance.com

Affiliation:

Subject: Gas powered equipment

Comment:

No need to eliminate gas powered equipment when there are much  
bigger issues in this country

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 12:29:51

No Duplicates.

**Comment 119 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Henry

Last Name: Buder

Email Address: henry@hblr.biz

Affiliation: North Coast Chapter

Subject: small engine ban

Comment:

I am against any ban on small engines. Small engines work hard and last a long time. Battery operated equipment is an option for the contractor, not a mandate. I own several pieces of battery operated equipment, which I love. But I also love the small engine. No battery mower can top my Honda mower. What are we going to do with all those used batteries? This is do good-ism to the max. I'm against it.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:01:44

No Duplicates.

**Comment 120 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Erik

Last Name: Mogensen

Email Address: mogensenlandscaping@comcast.net

Affiliation:

Subject: proposed ruling outlawing gas powered landscape equipment

Comment:

Please consider postponing this mandate to outlaw gas powered equipment until appropriate improvements have been made to electric powered (or other alternative) equipment options allowing the vigorous demands of the landscape industry to be met consistently on a daily basis. As a proponent for change based on environmental impact of gas powered machines, we have tried electric powered equipment on a number of occasions including outfitting a low demand landscape maintenance route with standard required demo equipment. We were met with challenges from the beginning including inferior power, underwhelming battery life, heavy equipment, etc. all culminating in inferior performance and higher labor demands. With increasing wage demands and now potentially new equipment purchase requirements, I urge that 2024 be reconsidered for a later date in order to improve efficiency for a more seamless transition on all levels. Product performance, battery life, quick charging stations, gas powered equipment buybacks/rebates, supply issues and so more all need to be addressed before we can make such a drastic change.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:24:02

No Duplicates.

**Comment 121 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steven

Last Name: Brink

Email Address: steveb@calforests.org

Affiliation: California Forestry Association

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

Comment:

Comments attached from California Forestry Association.

Attachment: 'www.arb.ca.gov/lists/com-attach/134-sore2021-BzUHMAc3BGYHMFNm.docx'

Original File Name: 211115\_comments on small engine rule FINAL.docx

Date and Time Comment Was Submitted: 2021-11-15 15:59:39

No Duplicates.

**Comment 122 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robert  
Last Name: Olsen  
Email Address: robert@goldenstatelandscapes.com  
Affiliation:

Subject: Regarding Gas Powered Equipment  
Comment:

To whom it may concern,

I am a licensed landscape contractor in California.  
I have read the bill, which alleges that the alternative technology  
is equivalent to gas powered engines. This is completely false.  
My company uses the battery powered equipment, in addition to gas  
powered - and there is a very clear winner here. Gas powered  
equipment is far more powerful, efficient, and cost effective.

1/1/24 does not allow enough time for electric/battery-powered  
commercial grade landscape equipment to be able to handle the  
demands of professional landscape work.

Please allow gasoline-powered commercial grade landscape equipment  
to be sold until at least 2028, so equipment can be further  
developed, costs can come down and supply chain issues be solved.

Thank you.

Sincerely,  
Robert Olsen

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-16 13:03:18

No Duplicates.



**Comment 123 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: Ricketts  
Email Address: miker@hotsysocal.com  
Affiliation:

Subject: Small Off Road Engine Regulations  
Comment:

I am an industrial supplier to commercial cleaner / small business owner operating a commercial cleaning business) servicing (municipalities / office parks / retail /residential customers) in the greater Southern CA area for the last 21 years. I proudly come from the Anaheim community located in Orange county. I employ 11 workers and we take great pride in the service we provide the community. Within the last year, we partnered with Orange County Conservation Corps, multiple municipalities, fire department, LA County Fire, OC Parks, multiple school districts including OCUSD, Anaheim, Perris, Tustin. The list goes on and on. Our equipment is used to clean and sanitize schools, food venues, municipal areas, parks, bus stops, Gas engine pressure washers are used to clean and the (main / most efficient) tool we use is an internal combustion powered pressure washer. There is no replacement for pressure washers on the horizon in an electrical unit. Beyond this, all of these companies, institutions, or organizations have crews working daily. The mandate of no internal combustion engines being considered would eliminate the jobs of nearly all of our staff. The level of cleanliness in outdoor areas will fall to dangerous levels if cleaning by pressure washer is eliminated. We care deeply about a clean environment for both the health of our neighbors and beauty of our community. (where applicable) We have participated in water recovery / water treatment as well as propane burner usage in accordance with all state and local regulations. Thank you for your consideration. Let's keep America Clean and Safe.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-16 14:15:06

5 Duplicates.

**Comment 124 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robin  
Last Name: Pasterski  
Email Address: Rpasterski@comcast.net  
Affiliation:

Subject: Gas powered leaf blowers  
Comment:

Please. Let's work to get rid of these polluting noise making machines.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-16 18:33:58

No Duplicates.

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

First Name: Brett

Last Name: Brennan

Email Address: brett@myurbanhabitat.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 07:46:23

110 Duplicates.

**Comment 126 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Judith

Last Name: Haemmerle

Email Address: judith@mopalia.net

Affiliation:

Subject: Support for ban on gas powered small engines

Comment:

PLease pass this ban. The argument that it will make it impossible for landscapers to do their jobs is nonsense. People maintained gardens and lawns for many decades before we were subjected to this noise and air pollution. Please pass this ban.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:17:10

No Duplicates.

**Comment 127 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Brian

Last Name: Robinson

Email Address: brian@brianrobinsonlandscaping.com

Affiliation: Robinson Landscaping

Subject: potential banning of gas-powered equipment

Comment:

If the ban takes effect, all of our customers would see higher costs. I know that humans cannot change the climate; it has always changed without our influence. Computer models are bogus, because there is no way to predict heat from the sun, wind currents, and air pressure. Plants need carbon dioxide for survival.

Battery powered equipment needs lithium and a lot of other natural resources and energy to build them. These batteries can't be recycled. This state doesn't even have enough electricity for our present needs, electricity uses a lot of natural gas, oil and coal.

It is more efficient to just use gas.

Small mowers and blowers can be OK with battery or power cords, but chain saws and large mowers probably can't. This potential ban is a very bad idea that won't do anything to "cool" the climate. Even if it does get warmer, why is the ideal temperature right now?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 08:44:40

No Duplicates.

**Comment 128 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Louis  
Last Name: Priven  
Email Address: loupriven@aol.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Louis Priven

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:02:36

248 Duplicates.



**Comment 129 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Annie

Last Name: Belt

Email Address: annieb58@hotmail.com

Affiliation:

Subject: Leaf Blowers

Comment:

We need zero emissions leaf blowers ASAP.  
Please make it happen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:03:31

No Duplicates.

**Comment 130 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Peter

Last Name: Roodhuyzen

Email Address: proodhuyzen@gmail.com

Affiliation:

Subject: 2 stroke engines

Comment:

Please phase out the use of 2 stroke engines in CA  
We must phase out of gas powered engines and the lawn industry  
can make a great contribution to that end. They are horrible and  
cause a great amount of air and sound pollution. Alternatives  
are a great alternative.  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:02:13

No Duplicates.

**Comment 131 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Logan

Last Name: Donovan

Email Address: loganfahey1@gmail.com

Affiliation:

Subject: Zero emission leaf blowers and small engine tools

Comment:

It blows my mind that any of us have to even ask for this at this point. These small engine nightmares have been destroying the air and peace everywhere they are used. Dispute being illegal in LA. I'm so disgusted with our cities and states. I hope this will have ANY impact.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:03:28

No Duplicates.

**Comment 132 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: James  
Last Name: Roberts  
Email Address: jamesroberts@hotmail.com  
Affiliation:

Subject: Fossil Fuels  
Comment:

We eventually have to stop using fossil fuels before they run out... Why not change the simple things to electric while we can...

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:06:04

No Duplicates.

**Comment 133 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robert  
Last Name: Reed  
Email Address: robtsreed@gmail.com  
Affiliation: Retired

Subject: emmissions  
Comment:

just do it

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:05:56

No Duplicates.

**Comment 134 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alisha  
Last Name: Seaton  
Email Address: alishaseaton@yahoo.com  
Affiliation:

Subject: Gas leafblowers  
Comment:

Dear Chair Randolph and Members of the Board,

My son is asthmatic and the rising levels of children who have asthma in LA is growing. The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Thank you.

Alisha Seaton  
Los Angeles, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:04:44

No Duplicates.

**Comment 135 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Eleanor  
Last Name: Anderson0Miles  
Email Address: eam10@hotmail.com  
Affiliation:

Subject: Clean air  
Comment:

We need to eliminate all emissions that destroy our ability to  
breath clean air. Please act accordingly in all you do.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:05:51

No Duplicates.

**Comment 136 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kate

Last Name: Lenhardt

Email Address: katelenhardt@gmail.com

Affiliation:

Subject: Small Engine regulation

Comment:

I live in a community that includes landscape maintenance. Unfortunately, this includes constant noise and pollution from equipment, including lawn mowers and leaf blowers. I would very much appreciate regulation that requires quieter and zero emission equipment. It's a quality of life and environmental issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:03:10

No Duplicates.



**Comment 137 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mayumi

Last Name: Knox

Email Address: Mayumi@echemexpo.com

Affiliation:

Subject: Garden blower

Comment:

I support the zero emission garden blower to be implemented. Every bit of reduction in emissions counts to reduce the impact of global warming.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:06:22

No Duplicates.

**Comment 138 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Patricia

Last Name: Blackwell-Marchant

Email Address: patmarchant@comcast.net

Affiliation:

Subject: Noise pollution is unhealthy, too!

Comment:

Please do all you can to end the use of noise-polluting lawn and garden equipment. We need to protect our communities and wildlife from the noise.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:08:05

No Duplicates.

**Comment 139 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Belinda

Last Name: Kein

Email Address: bjkslo@sbcglobal.net

Affiliation:

Subject: Leaf Blowers

Comment:

The emissions from hand held leaf blowers is noxious and contributes to pollution and carbon in our atmosphere. There is no reason to allow this kind of needless toxicity to continue. WE as a nation must eliminate these noisy toxic blowers and, as need be, replace them with zero-emissions blowers. The same goes for all vehicles and the like that use single-stroke engines. The time is now!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:06:01

No Duplicates.

**Comment 140 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Roger  
Last Name: Robles  
Email Address: rrobles13@hotmail.com  
Affiliation:

Subject: Leaf Blowers  
Comment:

I support California's transition to clean lawn care equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:09:50

No Duplicates.

**Comment 141 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sharon  
Last Name: Nagaran  
Email Address: snagaran@san.rr.com  
Affiliation:

Subject: Transition to Clean Lawn Care Equipment  
Comment:

I support the transition to clean lawn care equipment. And although the transition date is 2024, I believe that it can and should be accomplished by 2023.  
Thank you for your consideration.

Sharon Nagaran

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:03:41

No Duplicates.

**Comment 142 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Paul  
Last Name: Wellin  
Email Address: nrgwell@yahoo.com  
Affiliation:

Subject: Small Off-Road Engines  
Comment:

Gas-powered leaf blowers and lawn mowers are a health hazard in every neighborhood in the country. In order to maintain the health and safety of the community, CARB must require 100% of the small off-road engines (SOREs) sold in California to be zero emission.

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Pau Wellin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:02:48

No Duplicates.

**Comment 143 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Shan  
Last Name: Albert  
Email Address: shanals@earthlink.net  
Affiliation:

Subject: Gas blowers. Lawn mowers.  
Comment:

The odor of gasoline and the disgusting fumes from leaf blowers are not just a nuisance they sicken us. Impossible to leave windows open many days if you don't want the fumes entering your home !

I'm sensitive to pollution and my doctor advised me to move out of L A if I want to stay well. Sad!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:02:52

No Duplicates.



**Comment 144 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: James

Last Name: Stone

Email Address: jstone@mtsac.edu

Affiliation:

Subject: Zero emissions

Comment:

Californians consistently breathe dirty air, despite the states partial shift away from fossil fuels for electricity. Consequently, it is important for public health that the California Air Resources Board adopt a zero emissions standard for Small Off-Road Engines such as those that power lawnmowers and leaf blowers. Please support better air quality and health for all Californians by voting to support the adoption of this policy. Thank you!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:09:32

No Duplicates.

**Comment 145 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John  
Last Name: Goldsmith  
Email Address: jgldsmthj@gmail.com  
Affiliation:

Subject: Small Off-Road Engines  
Comment:

Please pass the proposed Small Off-Road Engine Regulation to end  
the sale of polluting lawn and garden equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:12:52

No Duplicates.

**Comment 146 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robert  
Last Name: Rippetoe  
Email Address: psroseguy@hotmail.com  
Affiliation:

Subject: Pollution  
Comment:

Small engines cause LOTS of pollution, more than cars!  
It's time to do away with them!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:13:04

No Duplicates.

**Comment 147 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Randy  
Last Name: Nichols  
Email Address: simonbaker4@hotmail.com  
Affiliation:

Subject: No more gas powered leaf blowers!  
Comment:

Gas powered leaf blowers are a scourge in my neighborhood! They are completely ruining any quality of life here. Everyday there is some property next to me operating a leaf blower. The noise is deafening and the stench of burning and unburnt fuel is sickening. It is not healthy or safe to be within a hundred feet of these machines. God knows what it is doing to the poor workers who use them. We need to completely get rid of fossil fuel leaf blowers and generators and require property owners to provide exterior power outlets for electric alternatives. There should be noise limitation standards also required for all new leaf blowers. Eventually blowers of any kind should be abolished since they kick up a cloud of toxic dust that drifts across the entire neighborhood. LA has a history of air pollution -- we need to continue to combat it at every level. Work on leaf vacuums (instead of blowers) and other alternatives must be promoted and supported.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:07:18

No Duplicates.

**Comment 148 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: JOHN

Last Name: Lamb

Email Address: johnlamb46@gmail.com

Affiliation: None

Subject: Zero Emissions

Comment:

In a time when Climate Change has been proved to be a REAL THREAT to all of us on this planet, it makes sense to do WHAT NEEDS TO BE DONE to fight this threat! Zero Emissions of all leaf blowers is the step that NEEDS TO BE IMPLEMENTED IMMEDIATELY!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:12:55

No Duplicates.

**Comment 149 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jayne

Last Name: Cerny

Email Address: jaynecerny@gmail.com

Affiliation:

Subject: Gas emissions

Comment:

These massive pollutants must be eliminated. Alternatives must be used. It's absurd to continue to subject the air we breathe to a tool with no limits to the exposure.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:08:18

No Duplicates.

**Comment 150 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: E Ann

Last Name: Neel

Email Address: poolridge@earthlink.net

Affiliation:

Subject: Zero emissions

Comment:

Keep our neighborhoods CLEAN and unpo9luuted!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:17:35

No Duplicates.

**Comment 151 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Patricia

Last Name: Sharp

Email Address: patsharpdesigns@hotmail.com

Affiliation: - Select -

Subject: gas-powered leaf blowers and lawn mowers

Comment:

The dirty air and noise these gas-powered leaf blowers and lawn mowers can be improved upon. My lungs and eardrums can't be.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:15:21

No Duplicates.



**Comment 152 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Marilee

Last Name: Brooks

Email Address: marilee@2brooks.com

Affiliation:

Subject: Small off road Engine Regulations

Comment:

Small off road Engine Regulations are highly inefficient and spew toxic fumes and particles at a disproportionately high rate. It is a easy- low apple- to reduce carbon and it will be better for the health of those near them constantly.

Please develop regulations for these items

Thank you

Marilee Brooks

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:16:49

No Duplicates.

**Comment 153 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tom  
Last Name: Halderman  
Email Address: tomhalderman@gmail.com  
Affiliation:

Subject: Zero Emissions Small Off-Road Engine Regulations  
Comment:

California must lead the nation in eliminating deadly pollution from small off-road vehicles, leaf blowers and other landscape maintenance equipment.  
100% of SORES must be zero emissions.

Thanks for taking my comments,  
Tom Halderman

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:14:07

No Duplicates.

**Comment 154 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: Schwager  
Email Address: myklSchwager@gmail.com  
Affiliation:

Subject: Remove Gas-Powered Small Off-Road Engines  
Comment:

I live in a large apartment complex in Irvine, where we are daily exposed to unhealthy leaf blowers and other gas-powered equipment, as are other California residents.

Please act to replace these polluting devices per your staff recommendations.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:05:33

No Duplicates.

**Comment 155 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: James  
Last Name: Duzanica  
Email Address: duzanica@gmail.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

If not now, when?

Thank you  
James Duzanica

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:12:26

No Duplicates.

**Comment 156 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Greg  
Last Name: Rowe  
Email Address: gregrowe50@comcast.net  
Affiliation: NA

Subject: Small Off-Road Engine Regulations  
Comment:

Dear ARB: Please quickly enact and begin enforcing rules to ban the sale of gas-powered gardening equipment such as lawnmowers and leaf blowers. In reality, the latter should more properly be called "dust blowers," because they are used year-round in our neighborhood and mainly blow particulates rather than leaves.

Our home on a cul-de-sac is surrounded by 7 other homes, almost all of which employ gardeners who use dust blowers every week. We hear them 6 days a week, and must constantly run to close our windows to keep out the gasoline exhaust fumes and dust.

I began my career as a health educator for an affiliate for the American Lung Association and later worked as an environmental planner (much of it in air quality). As such, I implore ARB to reduce the incidence of COPD in California by banning dust blowers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:18:53

No Duplicates.

**Comment 157 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: JL  
Last Name: Angell  
Email Address: jangell@earthlink.net  
Affiliation:

Subject: Please pass the proposed Small Off-Road Engine Regulation to end the sale of  
polluting law

Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:17:00

No Duplicates.

## **Comment 158 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kristel  
Last Name: Wickham  
Email Address: kristel@timetodream.com  
Affiliation: California human

Subject: Approve and amend SORE regulations  
Comment:

Chair Randolph and Members of the Board,

I am a homeowner in Sunnyvale and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024. Please approve and amend the SORE regulations per the staff recommendation.

As you know we are in a climate crisis. There is no room left in our carbon budget for polluting tools that have clean electric options in the market. As you also know, the use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and degrades California's air quality. California continues to fail to meet national air quality standards, which means that millions of Californians breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Thank you for taking action,  
Sincerely,  
Kristel Wickham

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:14:59

No Duplicates.



**Comment 159 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bonnie  
Last Name: MacRaith  
Email Address: bmacraith@reninet.com  
Affiliation:

Subject: zero emission SOREs  
Comment:

Dear CARB,  
Please pass the proposed Small Off-Road Engine Regulation to end  
the sale of polluting lawn and garden equipment! I for one  
experience this pollution when my gardener uses the leaf blower and  
other gas driven equipment!  
Thank You,  
Bonnie MacRaith  
Arcata, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:22:30

No Duplicates.

**Comment 160 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Evan Jane  
Last Name: Kriss  
Email Address: samesamejane@gmail.com  
Affiliation:

Subject: BAN Gas Powered Leaf Blowers and Lawn Mowers  
Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:  
\$8.8 billion in health insurance benefits through 2043  
892 premature deaths avoided  
438 fewer emergency room visits for asthma  
311 fewer hospitalizations for respiratory and cardiovascular issues

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:25:34

No Duplicates.

**Comment 161 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David  
Last Name: Wappler  
Email Address: david.wappler@gmail.com  
Affiliation:

Subject: Yes on Zero Emissions Small Off-Road Engines (SOREs)  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

In addition, the new battery powered equipment will be QUIETER!!! I despise when the grounds maintenance crew works around the large apartment complex I live at in Ventura CA (Sofi Ventura), due to the significant air and noise pollution they produce.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
David Wappler

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:15:40

No Duplicates.

**Comment 162 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Deborah  
Last Name: Kennedy  
Email Address: djkenedyart@gmail.com  
Affiliation:

Subject: Leaf blowers  
Comment:

Please help us reduce emissions from leaf blowers now. We must act today to stop the decline of our climate. We are all vulnerable now, waiting is not acceptable.  
Thank you, Deborah

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:26:41

No Duplicates.

**Comment 163 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Amy

Last Name: Gable

Email Address: amygable11@comcast.net

Affiliation:

Subject: Pass the proposed Small Off-Road Engine Regulation to end the sale of polluting lawn  
and g

Comment:

I urge you to pass the proposed Small Off-Road Engine Regulation to  
end the sale of polluting lawn and garden equipment. It will be a  
step in the right direction for our state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:25:51

No Duplicates.

**Comment 164 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: uwe-markus (max)

Last Name: partl

Email Address: partlmax@gmail.com

Affiliation:

Subject: end polluting leave blowers and other small two stroke engines for outdoor use

Comment:

Thanks for working to reduce the CA carbon footprint by ending these annoying and polluting small engines in all of our neighborhoods.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:25:56

No Duplicates.

**Comment 165 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Chris  
Last Name: Gilbert  
Email Address: chris@gilbertbiz.com  
Affiliation:

Subject: ban gas powered leaf blowers and other garden appliances  
Comment:

Gas powered leaf blowers and other appliances: They are noisy & smokey & polluting. Two-stroke engines especially are bad on the environment. Battery & cord devices exist. Let's switch to those. Let's not make this complicated. Rebates can be provided for those who need to purchase the new replacement equipment and have difficulty affording it.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:25:48

No Duplicates.

**Comment 166 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: JACQUES  
Last Name: BLUMER  
Email Address: jacquesblumer@hotmail.com  
Affiliation:

Subject: Blowers  
Comment:

Go electric

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:29:54

No Duplicates.



## **Comment 167 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Melinda  
Last Name: Cotton  
Email Address: mbcotton@hotmail.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I live in Long Beach, California, in the crowded coastal neighborhood of Belmont Shore. Gas-powered leaf blowers and lawn equipment are used almost daily by hired gardeners (known colloquially as 'blow and mow' yard care workers)- and spread dangerous fumes, dust, and noise onto our home and property and throughout the neighborhood - causing health problems of many types.

I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024. This is an urgent need for the health of Californians.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

- \$8.8 billion in health insurance benefits through 2043
- 892 premature deaths avoided
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Melinda Cotton

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:20:27

No Duplicates.

**Comment 168 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dan  
Last Name: Roddick  
Email Address: cyberstork@gmail.com  
Affiliation: Breather with breathing kids and grands

Subject: Small Engine Regs  
Comment:

Folks,  
PLEASE pass the proposed Small Off-Road Engine Regulation to end  
the sale of polluting lawn and garden equipment.

As I'm sure you know, the use of gas-powered leaf blowers and lawn  
mowers can cause numerous health problems and contributes to poor  
air quality. California consistently fails to meet national air  
quality standards, which means millions of Californians breathe  
unhealthy air everyday.

California's communities and environment deserve better. To ensure  
that all communities have breathable air in the state, CARB must  
require 100% of the SOREs sold in California to be zero emission.

These items have been under the radar for far too long. Let's move  
toward correcting this now!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:21:33

No Duplicates.

**Comment 169 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Maryfrances

Last Name: Careccia

Email Address: mfc1206@yahoo.com

Affiliation:

Subject: ENVIRONMENT

Comment:

PLEASE- IF LEAVE BLOWERS ARE REALLY NECESSARY-THEN AT LEAST MAKE  
THEM ZERO EMISSIONS!!! OUR PLANET IS DYING< AND WE'RE BLOWING  
LEAVES AROUND???

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:30:41

No Duplicates.

**Comment 170 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: ricco

Last Name: bonelli

Email Address: riccobonelli@yahoo.com

Affiliation:

Subject: Small Off-Road Engine Regulation

Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

My family and I are routinely put off by the foul odors and smells produced by these devices. Holding our noses and shutting our windows can't be the answer. Please provide the protections that my family and all California families deserve.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:28:35

No Duplicates.

**Comment 171 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Taryn

Last Name: Braband

Email Address: tarynbraband@hotmail.com

Affiliation:

Subject: Remove Gas-Powered Leaf Blowers & Lawn Mowers

Comment:

In order to keep emissions down, the use of gas powered leaf  
blowers and lawn mowers should be eliminated.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:32:18

No Duplicates.

**Comment 172 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Matt  
Last Name: Williams  
Email Address: mwillia@mac.com  
Affiliation:

Subject: lawn mowers, leaf blowers and so on  
Comment:

Please go to zero emission for these small devices. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:33:23

No Duplicates.

**Comment 173 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Lee  
Last Name: Auerbach  
Email Address: auerbachlee@gmail.com  
Affiliation:

Subject: Small Off-Road Engine Regulations: Transition to Zero Emissions  
Comment:

Hi,  
I am in favor of prohibiting small off-road engines as quickly as possible. These engines are responsible for a disproportionate and unsustainable amount of emissions which are contributing to global warming. They also cause excessive noise which is a nuisance and can cause hearing loss.  
Thank you,  
Lee Auerbach

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:32:56

No Duplicates.



**Comment 174 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Deb  
Last Name: Malcarne  
Email Address: bubwaller@sbcglobal.net  
Affiliation:

Subject: Support for CA's transition to cleaner lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

There are many very hard steps we need to take to have an effect on climate control, but transitioning to cleaner lawn care equipment is one of the easier steps that should be taken ASAP. I live in California and support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024--or sooner, if possible, as this obvious change with its major positive benefits should have happened years ago.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you,  
Deb Malcarne, long-time San Diego resident

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:30:45

No Duplicates.

**Comment 175 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gail

Last Name: Zermeno

Email Address: zazgz@aol.com

Affiliation:

Subject: Clean lawn care clean air

Comment:

No gas leaf blowers etc  
Clean air

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:34:35

No Duplicates.

**Comment 176 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mary

Last Name: Gill

Email Address: marymcveygill@gmail.com

Affiliation:

Subject: Support for clean lawn-care equipment

Comment:

My neighbors have gardeners who use gas-powered equipment, and it is unbelievably noisy and a real nuisance in this era of Zoom events. A few of them are trying to help their gardeners buy electric equipment--they are good people and well-intentioned. However, a law would be very advantageous to aid in the transition for the many who have no idea how harmful gas-powered equipment is to the environment and to our health. I was shocked when I learned how much pollution they cause. Please support the Amendment to the Small Off-Road Engine Regulations.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:31:03

No Duplicates.

**Comment 177 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kae  
Last Name: Bender  
Email Address: kaebender@juno.com  
Affiliation:

Subject: Comment for Notice of Public Hearing to Consider Proposed Amendments to the Small Off-Road

Comment:

"Small Off-Road Engines" can be a source of pollution and MUST be included as you limit emissions. As a nation, we must strive to go beyond "net zero" to ensure that we are not just eliminating greenhouse gases but also improving the quality of our clean energy supply. Small appliances and engines MUST be part of the solution, not continue to exacerbate the problem.

I urge CARB to enact stringent regulations to phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

I was glad to see that the California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. These sort of supports for small businesses are important as part of the efforts to clean up our air and environment.

We in SoCal and around the world appreciate the efforts to make our planet a healthier place and ensure a safe future for our grandkids.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:29:22

No Duplicates.

**Comment 178 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jon  
Last Name: Rosenfield  
Email Address: jarosenfield@gmail.com  
Affiliation:

Subject: Ban fossil fuel leafblowers  
Comment:

Members of the Board:

Please ban fossil-fuel powered lawnmowers, leaf blowers, and similar equipment. We cannot continue to tolerate air & noise pollution, and associated health and social impacts, that come from use of this equipment. Fossil Fuel powered lawncare appliances produce inordinate amounts of pollution that can send users and their neighbors to the hospital, or worse. They also generate noise and dust that impact everyone and really impact neighborhoods.

We don't need fossil fuel powered lawn maintenance equipment. I grew up on the east coast in the 1970's and 1980's, with a yard that was large by northern California standards. We mowed our lawn with an electric mower and managed the leaves with rakes or electric leaf blowers. Electric mowers and blowers are more advanced and powerful now than they were decades ago -- and yards are smaller. There's really no need for fossil fuel engines for residential, corporate, or municipal yard maintenance.

Please ban fossil fuel powered yard maintenance equipment completely and quickly as possible.

Thank you  
Jon Rosenfield

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:25:32

No Duplicates.

**Comment 179 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Darlene

Last Name: Ross

Email Address: gcross@sbcglobal.net

Affiliation:

Subject: Gas-Powered Leaf Blowers

Comment:

We Californians need to rid the state of gas-powered, noise  
polluting, and air polluting leaf blowers now!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:38:47

No Duplicates.

**Comment 180 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Arlene C.

Last Name: Van Craeynest

Email Address: acvancaeynest@gmail.com

Affiliation:

Subject: Global warming

Comment:

We need to control pollution from off-road vehicles and lawn management equipment. Please get o;board with doing something about this problem.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:39:20

No Duplicates.



**Comment 181 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kathy  
Last Name: Sabatini  
Email Address: ksabatin53@yahoo.com  
Affiliation:

Subject: No emissions lawn care equipment  
Comment:

Please quickly pass the Small Off-road Engine Regulation proposal!  
The amount of emissions is staggering and we have alternatives for  
replacement now.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:38:34

No Duplicates.

**Comment 182 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Clair  
Last Name: Brown  
Email Address: clairbrown@gmail.com  
Affiliation: UC Berkeley

Subject: Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions  
AND Publ

Comment:

Dear CARB,  
As you draft amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions AND Public Availability of Additional  
Documents and Information, make sure you use the science-based  
evidence of the health benefits from zero emissions SORE:  
\$8.8 billion in health insurance benefits through 2043  
892 premature deaths avoided  
438 fewer emergency room visits for asthma  
311 fewer hospitalizations for respiratory and cardiovascular  
issues.  
These are large and important health benefits that make it  
imperative to have strong rules for SORE.  
Sincerely yours,  
Clair Brown  
Prof of Economics, UC Berkeley

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:28:32

No Duplicates.

**Comment 183 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Francesca  
Last Name: Rago  
Email Address: bah000224@hotmail.com  
Affiliation: 925-457-5468

Subject: Zero Emission SOREs  
Comment:

Please require that all SORES sold in California be zero emission.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:44:58

No Duplicates.

**Comment 184 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ron

Last Name: Parsons

Email Address: flowershots@hotmail.com

Affiliation:

Subject: California air quality

Comment:

Please do the correct thing and address the issue of gardening equipment that uses gasoline and mixed fuel. Now is the time, not a year from now. This equipment is unhealthy for the environment and for the users. We need action taken now, not promises that are broken. If you are on this board then you should be promoting healthy air; if you aren't then get a different job like a lobbyist for the energy companies.

Sincerely,  
Ron Parsons

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:40:53

No Duplicates.

**Comment 185 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David  
Last Name: Arrivee  
Email Address: darrivee@gmail.com  
Affiliation:

Subject: Small Off-Road Engine Regulation  
Comment:

Dear members of the board,

I am writing to urge you to pass the proposed Small Off-Road Engine Regulation. Transitioning gas powered lawn mowers, leaf blowers and similar products to electric power will not only reduce CO2 emissions, it will improve air quality and benefit the health of all Californians. I'm sure I don't need to tell you this!

Thanks for your time, and best wishes,  
David Arrivee  
Arroyo Grande, CA 93420

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:43:00

No Duplicates.

## **Comment 186 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Aaron

Last Name: Osorio

Email Address: smoosh3466@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 09:47:52

No Duplicates.

**Comment 187 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dennis

Last Name: Ruby

Email Address: todmruby@gmail.com

Affiliation:

Subject: Banning small gas engines

Comment:

Greetings,

It is time for the phase out of these small polluting and noisy devices. I have replaced my yard blower and chain saw with battery tools which work fine. I live rural so I use these tools a lot. I purchased extra batteries and told my gardener NOT to use his gas powered tools. He loves the yard blower.

We have to stop kicking the cans (issues) down the road for future generations to deal with. It is OUR responsibility and the time to address those responsibilities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:43:59

No Duplicates.



**Comment 188 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Beth  
Last Name: Wilcoxon  
Email Address: Brlw@pacbell.net  
Affiliation:

Subject: Gas powered blowers  
Comment:

The time has come to finally quickly phase out gas-powered blowers. We can no longer justify the huge amount of air pollution from them over the new battery-powered blowers. The pollution affects the health, immediate and long-term of all of us and should no longer be tolerated.

A secondary benefit of this change will be a huge improvement in noise pollution which will also improve our health and quality of life.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:41:42

No Duplicates.

**Comment 189 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Carol  
Last Name: Hirth  
Email Address: chirth@mac.com  
Affiliation:

Subject: Gas Powered Lawn Mowers and Leaf Blowers  
Comment:

Thank you for requiring that all lawn mowers and leaf blowers be  
emission free !

Gas powered blowers and mowers are dirty, destructive and dangerous  
to the environment and to people, neighbors, children, those with  
compromising health issues.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:49:29

No Duplicates.

**Comment 190 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Karen  
Last Name: Malley  
Email Address: bonic@hotmail.com  
Affiliation:

Subject: no emission leaf blowers  
Comment:

Hello

Since leaf blowers are not very essential, and they are adding to our pollution/ climate change problem, we need to change the fact that they are profusely used all over the country. We need an alternative to carbon emitting blowers, or just not have them.  
Thanks, Karen Malley

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:48:51

No Duplicates.

## **Comment 191 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sam

Last Name: Butler

Email Address: samjbutler@sbcglobal.net

Affiliation:

Subject: Support for California's transition to clean lawn care equipment

Comment:

I am a resident of Los Angeles, and want to express my full support for the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

I have personal experience of the polluting effects of old, poorly maintained gas-powered gardening equipment. On a daily basis in my neighborhood of Westchester, garden service providers come into the neighborhood and create a triple whammy of pollution from excessive noise, toxic air pollution caused by the equipment itself, and toxic air pollution caused by blowers that launch street level dirt into the air (including the heavy metals present on our hardscape surfaces). I'm sick of it in every sense and want this stopped.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

We have an existing city ordinance that prohibits this gas-powered equipment. Isn't it time to enforce it?

Please approve and amend the SORE regulations per the staff recommendation.

Thank you,

Sam Butler

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:45:38

No Duplicates.

**Comment 192 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Linda  
Last Name: Rollin  
Email Address: lhrrollin@hotmail.com  
Affiliation: Self

Subject: Small Off-Road Engine Regulation  
Comment:

This is the time to get gas powered small engines out of our communities. This is a daily emission in my block of 11 homes alone.

Please pass the Small Off-Road Engine Regulation. It's a seemingly small move, but I can tell you it would make a huge difference for every single one of us in California.

My heart flutters in anticipation!

Go for it! It's one step at a time. A little late, but necessary, nonetheless.

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 193 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: Winkler  
Email Address: mlwinkle@yahoo.com  
Affiliation: Redwood Energy

Subject: Small Off-Road Engine Regulation  
Comment:

I strongly support banning gasoline-powered leaf blowers and other landscaping equipment. These devices are highly polluting and noisy and can be replaced by battery or line-powered equipment.

Many years ago the New York Times rightly described the gasoline-powered leaf blower and its noise, pollution and uselessness as the, "Gardening Machine From Hell".

It is now time to consign these machines to Hell, where they belong.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:54:00

No Duplicates.

**Comment 194 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Thomas

Last Name: LaRusso

Email Address: Tlargo13@aol.com

Affiliation:

Subject: Small off road engine regulations

Comment:

End domestic landscaping maintenance air and noise pollution now.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:57:53

No Duplicates.



**Comment 195 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Keith

Last Name: Linstead

Email Address: Linsteadkeith@gmail.com

Affiliation:

Subject: Pollution

Comment:

Anything that can be done to make our air cleaner surely is a given  
'.. two - stroke engines are filthy .. and noisy ..

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:59:26

No Duplicates.

**Comment 196 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Megan

Last Name: Robbins

Email Address: meganrobbins@sbcglobal.net

Affiliation:

Subject: Stop The Sales of Polluting Gas Powered Yard Equipment As Soon As Possible

Comment:

Please stop the sale of gas powered, and highly polluting leaf blowers, and all other polluting gas powered yard equipment, as soon as possible. If it cannot be done until 2024, that will have to do.

I have been personally sickened (and therefore house-bound, at times) because of these terribly toxic, pollution spewing gas powered yard tools for decades now.

It is long overtime for CARB to ensure that gas powered yard equipment making companies switch permanently to selling only electric powered tools, in order to help ensure healthy air quality in our neighborhoods. This critical change needs to be final, and it needs to happen fast~ Our children's health, and overall community's welfare, depends on your decision.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:47:30

No Duplicates.

**Comment 197 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robin  
Last Name: Van Tassell  
Email Address: rbnvantassell@gmail.com  
Affiliation:

Subject: Air Quality and Safety  
Comment:

I respectfully urge you to update our laws to add additional  
protections for our health, Please ensure that all leaf blowers  
and landscape machinery go 100% electric.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:02:22

No Duplicates.

**Comment 198 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Janice

Last Name: Beyer

Email Address: janicebeyer@yahoo.com

Affiliation:

Subject: Leaf blower requirements

Comment:

Require electric blowers!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:02:38

No Duplicates.

**Comment 199 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mickey  
Last Name: Fielding  
Email Address: mickeyfielding@gmail.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:03:34

No Duplicates.

**Comment 200 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ronit  
Last Name: Rieser  
Email Address: Ronitrieser@yahoo.com  
Affiliation:

Subject: Phase out gas powered yard equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Ronit Rieser

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:59:25

No Duplicates.

## **Comment 201 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Paula  
Last Name: Rufener  
Email Address: phoebenhouse@aol.com  
Affiliation:

Subject: gas blowers  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,

Paula Rufener  
Torrance, CA 90503

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:02:18

No Duplicates.



**Comment 202 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ronit  
Last Name: Rieser  
Email Address: Ronitrieser@yahoo.com  
Affiliation:

Subject: Phase out gas powered yard equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Ronit Rieser

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:59:25

No Duplicates.

**Comment 203 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Hunter  
Last Name: Wallof  
Email Address: huntergatherer8@yahoo.com  
Affiliation:

Subject: Leaf blowers  
Comment:

We have to cut our pollution emissions in as many ways as we can and the noise and exhaust fumes from leaf blowers is one that can easily be replaced by electric ones.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:06:26

No Duplicates.

**Comment 204 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: D'Adamo  
Email Address: mvdadamo12@gmail.com  
Affiliation:

Subject: Regulate lawn equipment pollution  
Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:08:13

No Duplicates.

**Comment 205 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: NATASHA  
Last Name: Hopkinson  
Email Address: natashah@mac.com  
Affiliation:

Subject: air Quality  
Comment:

Please stop pollution. Keep our air clean!  
Thank you

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 206 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Lisa

Last Name: Kellman

Email Address: s-sage@sonic.net

Affiliation:

Subject: Small off road engine regulation

Comment:

I am a California resident and I urge you to support regulations that would phase out the sale of gas powered leaf blowers and lawn equipment. They contribute to poor air quality and impact people's health with their noxious fumes. In this age of unprecedented climate change, everything must be done to lessen the use of fossil fuels and to also to create a clean and breathable environment for all the citizens of California.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you,

Lisa Kellman

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:01:17

No Duplicates.

**Comment 207 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Julie  
Last Name: Dull  
Email Address: Sosfjulie@gmail.com  
Affiliation:

Subject: Why so loud  
Comment:

They pollute they are loud they serve ZERO purpose. Rake and  
compost!!! There is no such thing as "away". Pushing your junk on  
another's yard is not possible on a global scale. Why do we allow  
loud pollutants?!??

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 09:40:01

No Duplicates.

**Comment 208 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: joseph  
Last Name: Illick  
Email Address: jeillick@gmail.com  
Affiliation:

Subject: air pollution  
Comment:

Off-road engines to have zero pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:12:51

No Duplicates.

**Comment 209 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Hugh

Last Name: Moore

Email Address: Hmpeace1@yahoo.com

Affiliation:

Subject: CO2 emissions

Comment:

We need 0 emissions Now! Yes, impossible, but saying 0 by some future date does not convey the urgency of our current situation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:14:16

No Duplicates.



**Comment 210 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dan  
Last Name: Silver  
Email Address: dsilverla@me.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:16:58

No Duplicates.

**Comment 211 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Peter  
Last Name: Parasiliti  
Email Address: parasiliti@gmail.com  
Affiliation:

Subject: Pass the Small Off-Road Engine Regulation  
Comment:

Please for the love of god, regulate these engines. In Los Angeles alone there are hundreds of thousands, gas powered leaf blowers being used all day everyday. Not only do they contribute to poorer air quality for all, but the individuals using them are at greater risk of dynamic health problems as there is no protection/regulation in place on these tools. I can't stand smelling these blowers weekly at my apartment complex and don't understand why we haven't fixed this simple problem! I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:  
\$8.8 billion in health insurance benefits through 2043  
892 premature deaths avoided  
438 fewer emergency room visits for asthma  
311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,

Peter Parasiliti

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:12:55

No Duplicates.

**Comment 212 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: Fishbein  
Email Address: fishbein@humnet.ucla.edu  
Affiliation:

Subject: Gasoline Powered Lawn Mowers & Blowers  
Comment:

I have had personal experience with an electrically powered lawn mower and can attest to the fact that such mowers are as good or better than gasoline powered ones. They should be used instead of gasoline powered mowers. The same holds true for lead blowers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:17:18

No Duplicates.

**Comment 213 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jean  
Last Name: Jackman  
Email Address: jeanjackman@gmail.com  
Affiliation:

Subject: Proposed Amendments to Small Off-Road Engine Regulations  
Comment:

Dear CARB Board,

Kindly do anything possible to get us to zero emissions. We are a family with healthy diet, exercise routines and highly educated. Yet 2 out of 3 grandchildren have had such horrible lung problems that they were intubated. Not only is our air bad but the noise from gas leaf blowers is so deafening that often I cannot enjoy our backyard because of it. We Americans have bad health compared to those of other countries. We are not living as long as we did previously and we do not live as long as people in other countries. We can do better. Please use your powers, in spite of all of the paid lobbyists urging otherwise, speak for the people and get us to zero emissions with new policies.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:15:13

No Duplicates.

**Comment 214 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Pol

Last Name: HERMES

Email Address: polhermes@yahoo.com

Affiliation:

Subject: Zero emissions for Small Off-Road Engine Regulations

Comment:

It is time to make sure this proposed amendment passes so we cut down on dangerous emissions from small off-road engines.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:17:12

No Duplicates.

**Comment 215 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mary Ann  
Last Name: Huckabay  
Email Address: huckabay@synth.org  
Affiliation:

Subject: Zero Emmissions Leaf Blowers  
Comment:

We need zero emissions leaf blowers NOW!!  
Mary Ann Huckabay

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:24:25

No Duplicates.

**Comment 216 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ka

Last Name: Higgins

Email Address: karenh456@hotmail.com

Affiliation:

Subject: Please pass the small off-road engine regulation

Comment:

Please approve of the proposed small off-road engine regulation.  
Every day we are subjected to noisy, smelly, polluting lawn  
equipment. Please help us transition out of this outdated and  
highly polluting method of lawn care.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:21:31

No Duplicates.



**Comment 217 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kathlyn

Last Name: Hendricks

Email Address: katieh@hendricks.com

Affiliation: The Hendricks Institute, Inc.

Subject: Zero emissions and leaf blowers

Comment:

I was surprised to find out what a source of pollution gas leaf blowers have become and completely support a total ban on gas-powered blowers, which have been illegal in my small town of Ojai for a few years. They are also a source of noise pollution and remove one of the sources of regenerative agriculture--leaves.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:26:22

No Duplicates.

**Comment 218 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Howard  
Last Name: Whitaker  
Email Address: hjameswhitaker@att.net  
Affiliation:

Subject: Off-Road Engine Regulation  
Comment:

Please pass the proposed Small Off-Road Engine Regulation to end  
the sale of polluting lawn and garden equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:27:34

No Duplicates.

**Comment 219 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mary

Last Name: Gamson

Email Address: maryedda@verizon.net

Affiliation:

Subject: Transition to Zero Emissions

Comment:

Please act on the above!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:27:33

No Duplicates.

**Comment 220 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bob  
Last Name: Paquette  
Email Address: rpaquett@usc.edu  
Affiliation:

Subject: Stop gas powered lawn equipment  
Comment:

Global warming is the biggest threat to humanity. We need to reduce carbon emissions and pollution immediately. If you don't, you are putting the health of children in jeopardy, and worsening social injustice. No more delays.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:25:58

No Duplicates.

**Comment 221 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jane  
Last Name: Woehl  
Email Address: kestrel@winfirst.com  
Affiliation:

Subject: Amendments to the Small Off-Road Engine Regulations  
Comment:

Dear Chair Randolph and Members of the Board,

I live in Sacramento and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to Sacramento's poor air quality. And California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.  
Thanks, Jane Woehl

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:30:20

No Duplicates.

**Comment 222 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: Keenan  
Email Address: mickeen@gmail.com  
Affiliation: Mr.

Subject: Transition to Zero Emissions  
Comment:

Do the right thing for our air quality.  
Mk

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:34:40

No Duplicates.

**Comment 223 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: brandon

Last Name: gregg

Email Address: bgggobears@gmail.com

Affiliation:

Subject: Small off-road engine regulations

Comment:

Gasoline leaf blowers are an environmental disaster due to the huge amount of pollutants they emit into the air. Electric blowers would be a much better solution. The fumes and high-pitched noise of gas leaf blowers regularly cause people to close windows, be awoken from sleep, startle babies, and frighten pets. and that doesn't count the thin layer of dirt and dust that they kick up into the air that then drifts into homes, onto cars, or gets inhaled. Please outlaw these highly polluting small gas engines.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:30:42

No Duplicates.

**Comment 224 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tim  
Last Name: Bonfield  
Email Address: emmonsfried@gmail.com  
Affiliation:

Subject: Pollution on our world.  
Comment:

It is time for us to see the writing on the wall!  
It might be uncomfortable to change ,But change we must do for the  
future of our lives on this Earth.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:33:44

No Duplicates.



**Comment 225 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steviann

Last Name: Yanowitz

Email Address: steviannkagen@hotmail.com

Affiliation:

Subject: Small Off Road Engine Regulations

Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:36:24

No Duplicates.

**Comment 226 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Genette

Last Name: Foster

Email Address: gfoster102@sbcglobal.net

Affiliation:

Subject: Polluting small off-road engines (SORE)

Comment:

Gas powered leaf blowers are a significant source of air pollution in the Los Angeles basin. One hour of operation from a commercial leaf blower emits the equivalent of driving a 2017 Camry 1100 miles. While walking in my neighborhood, I am assaulted by fumes from leaf blowers--like standing behind a dirty diesel gas bus. This pollution also impacts the health and safety of lower wage workers. Trade-in programs can be developed to mitigate the financial burden on landscape workers.

Phasing out the use of SORE quickly can have a significant benefit in improved air quality and reduced carbon emissions. This is low-hanging fruit in the battle to save our state from irreversible climate change. Ban SORE's!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:23:31

No Duplicates.

**Comment 227 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Christopher  
Last Name: Horner  
Email Address: chorner630@aol.com  
Affiliation:

Subject: zero emission SORES  
Comment:

It's vital that California SORES transition to zero emissions to reduce air and noise pollution and to make the state safer and healthier for all.

Important too that for small businesses who are dependent on such engines (i.e. gardeners/landscapers, etc). a system of financial assistance be created to help reduce the cost of transitioning to zero emissions equipment.

Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:38:46

No Duplicates.

## **Comment 228 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Roderick  
Last Name: Webster  
Email Address: rwebster@elite.net  
Affiliation:

Subject: I support transitioning away from gas powered yard care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I live in Merced in the Central Valley where asthma and other respiratory health problems are double what they are elsewhere in the state. Almost every family has one or more members who are impacted. Which is not to say other areas of California are not contesting with similar impacts of poor air quality as well. But you can see why my concern is so great.

Please support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you for considering this long overdue measure to improve our air quality.

-Roderick Webster

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:41:04

No Duplicates.

**Comment 229 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Thomas

Last Name: Deetz

Email Address: trdeetz7@gmail.com

Affiliation:

Subject: Transition to zero emissions from small off-road engines.

Comment:

I fully support and urge your support of a rapid transition to zero emission equipment and the elimination of fossil fuel driven small off-road engines to help in the control of climate change. Thank-you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:48:00

No Duplicates.

**Comment 230 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Lisa

Last Name: Hammermeister

Email Address: necrohead56@gmail.com

Affiliation:

Subject: Leaf Blowers

Comment:

Make the blowers affordable to low income gardners.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:49:00

No Duplicates.

**Comment 231 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Karina  
Last Name: Maher  
Email Address: karinamaher@mac.com  
Affiliation:

Subject: Gas powered small engines - AB 1346  
Comment:

I am writing in my role as a physician to urge you to do all you can to support AB 1346 and ban the sale of gas powered small engines as soon as possible.

The pollutants and toxins emitted from gas powered small engines is significant and is damaging our health. This pollution increases our risk of heart attack, stroke, lung disease, cancer, and miscarriage. As a pediatrician, the increase in premature birth, low birthweight babies, and birth defects is especially heart breaking.

The social cost of the problems these gas powered small engines cause is enormous. It includes medical costs due to increases in the above diseases, premature deaths, degradation of natural resources, decreased GDP, property damage from climate-induced floods, wildfires, and climate remediation.

As a physician, I am asking you to do what is best for Californians' health. We have solutions for a safer, cleaner, healthier future. Now all we need is the political will to do the right thing and help translate AB 1346 into reality to clean up the air we all breathe.

Sincerely,  
Karina Maher, MD

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:47:42

No Duplicates.



**Comment 232 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kristina

Last Name: Wolf

Email Address: grandmastormwolf@aol.com

Affiliation: Kristina Wolf

Subject: Leaf Blowers

Comment:

I and everyone I know are tired of disruptive, polluting, NOISY leaf blowers. This is a quality of life issue. Please make them stop.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:50:36

No Duplicates.

**Comment 233 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Barbara

Last Name: Meislin

Email Address: purpleladybythebay@earthlink.net

Affiliation:

Subject: Air pollution equipment

Comment:

Stop sale of equipment that harms our environment and health.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:51:16

No Duplicates.

**Comment 234 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John  
Last Name: Rose  
Email Address: jnbrose2@gmail.com  
Affiliation:

Subject: Zero emissions leaf blowers  
Comment:

Zero emissions leaf blowers

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:51:10

No Duplicates.

**Comment 235 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Erik  
Last Name: Wilmot  
Email Address: erik\_wilmot@yahoo.com  
Affiliation:

Subject: small off-road engines...zero emissions  
Comment:

Please make small off-road engines zero-emission (and quieter too  
if you can). Thanks !

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:52:24

No Duplicates.

**Comment 236 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Lee

Last Name: Liddle

Email Address: lliddle@earthlink.net

Affiliation:

Subject: Support zero emission equipment

Comment:

I have been using a battery powered mower, edger, and blower for over 5 years. They are efficient and quiet. No trips to the gas station is another benefit. I support a quick transition to zero emission equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:48:14

No Duplicates.

**Comment 237 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Charles  
Last Name: Calhoun  
Email Address: clcalhoun@pacbell.net  
Affiliation:

Subject: leaf blowers  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians breathe unhealthy air everyday.

I urge you to approve and amend the SORE regulations per the staff recommendation.

Thank you,  
Charles Calhoun

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:55:33

No Duplicates.

**Comment 238 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Paul  
Last Name: Medved  
Email Address: pcmedved@gmail.com  
Affiliation:

Subject: Gas Powered Leaf Blowers and Lawn Equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Paul

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:57:36

No Duplicates.

**Comment 239 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael

Last Name: Szeto

Email Address: michael.szeto@gmail.com

Affiliation:

Subject: Eliminate the use of gas-powered leaf blowers and lawn mowers!

Comment:

Gas-powered leaf blowers and lawn mowers cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday. I hope CARB amends the regulations such that our air is healthier. These machines contribute enough emissions, so close to our homes, that urgent action is needed to eliminate their use.

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:57:48

No Duplicates.



**Comment 240 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Llll  
Last Name: D  
Email Address: Msldill@yahoo.com  
Affiliation:

Subject: Move to electric/zero emissions!!  
Comment:

To whom It May Concern

Happy Wednesday 11-17-21.... Please transition all off road smaller vehicles to green zero emissions!! Please please... it is time to transition all off road vehicles from gasoline power to electric zero emissions!!

Thank You,  
Now is the time...  
MsLl1D

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 10:56:54

No Duplicates.

**Comment 241 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kenneth  
Last Name: Nahigian  
Email Address: appalonius@netzero.net  
Affiliation: State of California

Subject: Please transition to zero-emissions equipment  
Comment:

As a concerned citizen, I support a reasonably expedited transision to zero-emissions leaf blowers and other equipment to reduce carbon outputs.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:02:12

No Duplicates.

**Comment 242 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: James  
Last Name: Hanson  
Email Address: puder830@gmail.com  
Affiliation:

Subject: Disallow gas lawnmowers and leaf blowers  
Comment:

Dear Board:  
We must be aggressive in reducing greenhouse gas emissions. Now that there are many electric (not to mention manual) lawnmowers and leaf blowers, please make these go away through whatever actions you can take to protect our local communities (these engines tend to generate high levels of local pollutants) and the world at large.  
Thank you,  
James H. Hanson, M.D.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:02:13

No Duplicates.

**Comment 243 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: barbara

Last Name: heitz

Email Address: beaberh@hotmail.com

Affiliation:

Subject: no more polluting leaf blowers

Comment:

Enough of the polluting mowers, leaf blowers and all outdoor gardening and recreational, for that matter, machinery. We've hopelessly ruined our environment, so stop, already, while we can still breathe! Humans are done and we've finished off many animal species, as well.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:00:48

No Duplicates.

**Comment 244 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Donald  
Last Name: Taylor  
Email Address: cplii@sbcglobal.net  
Affiliation:

Subject: Leaf Blowers  
Comment:

Please consider immediately transitioning away from gas powered leaf blowers. They are a public nuisance and a disaster environmentally.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:05:25

No Duplicates.

**Comment 245 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Peter  
Last Name: Andersen  
Email Address: westone47@gmail.com  
Affiliation: Sierra Club

Subject: Ban leaf blowers  
Comment:

Please ban power leaf blowers! Noisy and a major source of  
Greenhouse Gas.  
Peter

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 246 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: RICHARD  
Last Name: MONROE  
Email Address: richmonroe@aol.com  
Affiliation:

Subject: Small engine pollution  
Comment:

Please consider regulation and enforcement of pollution caused by small engines. Small engines lubricate by mixed oil and gasoline, which burns to high smoke, carbon emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:05:01

No Duplicates.

**Comment 247 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alden

Last Name: Jenks

Email Address: aldenjenks@gmail.com

Affiliation:

Subject: Small Off-Road Engine Regulations

Comment:

Gas-powered leaf blowers and lawn mowers must be phased out, and quickly get to zero emissions. Zero noise would be welcome too!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:08:09

No Duplicates.



**Comment 248 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: George  
Last Name: Brewer  
Email Address: twotonekisser@yahoo.com  
Affiliation:

Subject: CARB  
Comment:

clean air NOW

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:10:26

No Duplicates.

**Comment 249 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Virginia

Last Name: Turner

Email Address: vajuvet@aol.com

Affiliation:

Subject: Polluting leaf blower and other garden equipment

Comment:

Outlaw polluting gardening equipment

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 250 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Petr  
Last Name: Krysl  
Email Address: pkrysl@earthlink.net  
Affiliation:

Subject: Let's get rid of air pollution from leaf blowers and such  
Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

Thank you for listening.

Attachment: "

Original File Name:

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

2 Duplicates.

**Comment 251 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kenneth  
Last Name: Wilcox  
Email Address: kwilcox99@gmail.com  
Affiliation:

Subject: SORE2021  
Comment:

I am a California resident and I strongly support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Given that there are viable, nonpolluting alternatives to gasoline-powered small engines, it would be unreasonable and unethical to permit them to continue to poison our air.

Thank you for considering my comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:16:57

No Duplicates.

**Comment 252 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elaine

Last Name: Cass

Email Address: 5eiqxb8ge@relay.firefox.com

Affiliation:

Subject: No more noisy smelly leaf blowers and lawn mowers!

Comment:

Oh, that would be a relief! I understand that the gardeners who have already made purchases could use that equipment until it no longer functions, but any new purchases would have to be quieter, e.g. robotic lawnmowers : ))

Thursday in my neighborhood is a cacophony of machinery. It can't end soon enough. It would be better for the gardeners' respiratory systems and hearing as well!

Please help eliminate the stink and noise from these machines and pass these new regulations!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:19:51

No Duplicates.

**Comment 253 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: KEN  
Last Name: SCHROEDER  
Email Address: kschroeder70@yahoo.com  
Affiliation:

Subject: small off road engine regulations  
Comment:

Dear members of the California Air Resources Board,  
I live in Modesto, where the air quality is poor, and I support  
the adoption of new regulations that will phase out the sale of  
highly-polluting gas-powered leaf blowers and lawn equipment in  
California beginning in 2024.

Thank you.

Ken Schroeder

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 254 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Claudia  
Last Name: Wornum  
Email Address: claudiawornum@comcast.net  
Affiliation:

Subject: Keep clear air in California neighborhoods  
Comment:

Please pass the proposed Small Off-Road Engine Regulation to end the sale of polluting

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:  
\$8.8 billion in health insurance benefits through 2043  
892 premature deaths avoided  
438 fewer emergency room visits for asthma  
311 fewer hospitalizations for respiratory and cardiovascular issues.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:19:33

No Duplicates.

**Comment 255 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Janet  
Last Name: Lorraine  
Email Address: jlorraine@sonic.net  
Affiliation:

Subject: leaf blowers  
Comment:

They are too loud, too polluting to operate, stir up too much to further pollute the air. Also stirs up anger, at the careless and lazy destruction.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:21:37

No Duplicates.



## **Comment 256 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gretchen & Pat  
Last Name: HARPER  
Email Address: grettieduck@gmail.com  
Affiliation:

Subject: Public Meeting: Transition to Zero Emissions  
Comment:

Of the easiest things that can be done to lower emissions and transition to ZERO EMISSIONS ,one of the easier steps to be taken YOU can take for us, the citizens of California. You do not have to spend money to do this. You do not have to make money on this plan. YOU MUST PAY ATTENTION to the science involved in the CLIMATE CRISIS PROBLEM and offer the best options to the citizens of your state to make LIFE SURVIVABLE in the future and better now.It is my state and has been for the last 50 plus years. We have children, grand children and great grandchildren living in California and want for them the future of a NATURAL WORLD that does not threaten their lives and that will exist when they have children.

We take this problem seriously and ask you to take this proposal to make blowers of all sizes and descriptions that one can hold, push, carry or transport in some fashion ZERO EMISSIONS PRODUCTS.

This is a small action on your part and a small action that will make a BIG DIFFERENCE and something that we can all participate in and know that we have made a difference in literally "saving the Earth". All the small actions will add up to hope in peoples' hearts and something that MANY can participate in to really help not only their own neighborhoods, but their cities, states and countries.

Please take positive action toward the goal of ZERO EMISSIONS.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:07:42

No Duplicates.

**Comment 257 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sarah  
Last Name: Hearon  
Email Address: sbhearon@hotmail.com  
Affiliation:

Subject: zero emissions for leaf blowers PLEASE  
Comment:

If anyone asks me what my most hated thing is, I would say leaf blowers. I believe that at least 70% would say the same thing. The noise and pollution is unacceptable. Please do a favor for all of us who shudder when they hear and see leaf blowers everywhere, every day. Make them quieter and cleaner!

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:25:18

No Duplicates.

**Comment 258 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tara

Last Name: Hammond

Email Address: tara@hammondclimatesolutions.com

Affiliation: Hammond Climate Solutions

Subject: Please ban garden equipment that emits pollution

Comment:

For the sake of a just and livable future, please ban garden equipment that emits pollution! The equipment is terrible for the environment, poisons our air and is so harmful for workers!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:36:04

No Duplicates.

**Comment 259 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jeffrey  
Last Name: Lopic  
Email Address: listjeff@comcast.net  
Affiliation:

Subject: Small Off-Road Engines  
Comment:

Climate change is an immediate existential threat that we all need to take action in order to survive. Small Off-Road Engines that run on gas are significant greenhouse gas emitters. They need to phased out on an aggressive and accelerated timetable. Thank you. Jeff Lopic, Novato, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:37:47

No Duplicates.

**Comment 260 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bonnie  
Last Name: Mastiere  
Email Address: bjm4earth@gmail.com  
Affiliation:

Subject: CARB proposal  
Comment:

We REALLY need this--I've been waiting for a regulation such as this to come around. PLEASE lets do whatever it takes to pass this initiative for the sake of the planet, our environment, our health. Let's not wait another minute, please let's all do our part to provide a safer environment for all of us.

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 261 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mara

Last Name: Zlotoff

Email Address: zlotoffs@gmail.com

Affiliation:

Subject: Gas-powered leaf blowers and lawn mowers

Comment:

As a person with asthma, I am aware that the use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 262 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John  
Last Name: Livingston  
Email Address: livingstonjohn@att.net  
Affiliation: Shasta Group Sierra Club

Subject: Engine Regulations  
Comment:

We must stop polluting our air like it is a garbage dump. Lets get rid of all polluting engines of all sizes. People will change when they have alternatives and there are many non-fossil fuel machines out there. Thanks

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:42:23

No Duplicates.

**Comment 263 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Heather  
Last Name: Waters  
Email Address: htwaters@gmail.com  
Affiliation:

Subject: Ban noise and particle polluting gas powered leaf blowers please  
Comment:

It is time to phase out the gardening tools that elevate  
particulate pollution.

Please ban gas powered leaf blowers, etc.

Thank you,  
Heather Waters

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:44:04

No Duplicates.



**Comment 264 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Janet  
Last Name: De Lu  
Email Address: Newjerseydreamer@gmail.com  
Affiliation:

Subject: Lawn equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am writing in support of new regulations to phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

These gas-powered forms of lawn equipment are horribly polluting and inefficient. Gas-powered leaf blowers and lawn mowers, in particular, have a huge effect on air quality, which in turn causes numerous health problems. We need to bring California air standards up to meet national air quality standards.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Janet De Lu

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:42:37

No Duplicates.

**Comment 265 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Nataliya

Last Name: Veren

Email Address: natveren@yahoo.com

Affiliation:

Subject: I Support for California's transition to clean lawn care equipment

Comment:

use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality and noise!

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 266 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Katja

Last Name: Irvin

Email Address: katja.irvin@sbcglobal.net

Affiliation:

Subject: Support for California's transition to clean lawn care equipment

Comment:

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

- \$8.8 billion in health insurance benefits through 2043
- 892 premature deaths avoided
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives. Please approve and amend the SORE regulations per the staff recommendation.

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 267 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Nora  
Last Name: Doyle  
Email Address: noramdoyle@gmail.com  
Affiliation: Sierra Club

Subject: End the Sale of Polluting Lawn & Garden Equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a resident of Los Angeles, California and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems including cancer and asthma, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday in our own neighborhoods.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives. We must do everything we can as soon as possible.

Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:52:06

No Duplicates.

**Comment 268 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Cindy

Last Name: Meyers

Email Address: awakened2007@hotmail.com

Affiliation:

Subject: Leaf blowers! Climate change!

Comment:

We need to pay attention and make EVERY CHANGE THAT WE POSSIBLY CAN  
to save our lives and the lives of our future generations! NOW!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:55:52

No Duplicates.

**Comment 269 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Charlotte  
Last Name: Innes  
Email Address: innes1212@gmail.com  
Affiliation: Resident

Subject: Leaf Blowers  
Comment:

As a long-time resident of quiet neighborhoods in Los Angeles (30 years), I have been daily beset by the sound and smell of gas-powered blowers. The quality of air here is definitely worsened by their emissions. I often have to close my windows to keep the bad air out.

I have discovered that the use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air every day.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, the California Air Resources Board (CARB) must require 100% of the SOREs sold in California to be zero emission.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

- \$8.8 billion in health insurance benefits through 2043
- 892 premature deaths avoided
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues.

Please act now to keep our neighborhoods clean!

Thank you,  
Charlotte Innes

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 11:52:49

No Duplicates.

**Comment 270 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jiro  
Last Name: Yamamoto  
Email Address: jiroyamamoto@hotmail.com  
Affiliation:

Subject: Eliminate the SOREs  
Comment:

I am a San Francisco resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

As a retired firefighter I can appreciate the increase in public safety and public health from the reduction in the storage of gasoline and other petroleum fuels from the garages and sheds of California. I can also appreciate the reduction in burns and other injuries from the use of gas powered appliances.

Beyond the personal injuries and deaths, on a public health scale, the elimination of SOREs will improve the air quality in California. Do your best to act now, and reduce the magnitude of changes that will have to be enacted next year, next decade, next score of years, to prevent climate chaos.

thank you,

Jiro Yamamoto

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:04:04

No Duplicates.

**Comment 271 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Richard  
Last Name: Hubacek  
Email Address: richhubie@gmail.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024

Not only is this equipment noisy but they are hazardous to our health and contribute to climate warming.

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Thank you for reading my comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:05:59

No Duplicates.



**Comment 272 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Cathy  
Last Name: Holden  
Email Address: holdenresearch@sbcglobal.net  
Affiliation: Please Select

Subject: banish gas-powered leaf blowers  
Comment:

Gas powered leaf blowers are a curse! They cause terrible air and noise pollution. Please outlaw them.  
Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:12:31

No Duplicates.

**Comment 273 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Annette

Last Name: Benton

Email Address: bassoon66@hotmail.com

Affiliation:

Subject: Our air

Comment:

We need zero emission leaf blowers, NOW!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:17:02

No Duplicates.

**Comment 274 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Carolyn  
Last Name: Mone  
Email Address: carolmone@icloud.com  
Affiliation:

Subject: polluting yard equipment  
Comment:

please make sure polluting yard tools are banned for sale in CA

Thanks!

Carolyn

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:19:22

No Duplicates.

**Comment 275 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John

Last Name: Putt

Email Address: curare150@gmail.com

Affiliation:

Subject: gas powered blowers etc

Comment:

Although I am from a different state (Mich), I do believe that one way to decrease the amount of toxic substances in the air (in this case--CO2) is to outlaw gas powered equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:17:59

No Duplicates.

**Comment 276 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Carolyn  
Last Name: Mone  
Email Address: carolmone@icloud.com  
Affiliation:

Subject: polluting yard equipment  
Comment:

please make sure polluting yard tools are banned for sale in CA

Thanks!

Carolyn

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:19:22

No Duplicates.

**Comment 277 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tom  
Last Name: Kunhardt  
Email Address: tt101@mac.com  
Affiliation:

Subject: Zero emissions leaf blowers  
Comment:

Leaf blowers are noisy and polite the air. Let's convert to battery  
powered leaf blowers for quieter neighborhoods and less air  
pollution!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:08:42

No Duplicates.

**Comment 278 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jan

Last Name: Jones

Email Address: jan@metrostation.com

Affiliation:

Subject: Leaf blowers

Comment:

These tools should be electric. Gas machines pollute too much. My husband has been using an electric mower and blower for years. They work quite well.

Fossil fuels are killing the planet. They should be left in the ground.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:24:37

No Duplicates.

**Comment 279 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kevin  
Last Name: Bissonnette  
Email Address: windsurgen@aol.com  
Affiliation:

Subject: Zero Emission Leaf Blowers  
Comment:

This is a simple solution to help clean-up our environment. PLEASE  
require that fossil fuel powered leaf blowers, lawn mowers, etc.  
are phased-out rapidly over the next few years. The  
electric/battery powered alternatives are plentiful and  
effective....let's take advantage!! Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:26:29

No Duplicates.



**Comment 280 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jerry  
Last Name: Bernhaut  
Email Address: j3bernhaut@gmail.com  
Affiliation: River Watch

Subject: REGULATION OF GAS POWERED LEAF BLOWERS

Comment:

Gas power4d leaf blowers are GHG emitters, air quality polluting  
and noise polluting. Electric powered leaf blowers are MORE THAN  
ADEQUATE FOR NORMAL LANDSCAPING ACTIVITIES.

JERRY BERNHAUT

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:20:57

No Duplicates.

**Comment 281 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Marc  
Last Name: Milton  
Email Address: gusmid@hotmail.com  
Affiliation:

Subject: Gas powered lawn equipment  
Comment:

Good day,  
I have used gas-powered leaf blowers professionally for many years.  
They are horrible to operate, create greenhouse gas emissions,  
cause noise pollution, remove beneficial biomass from soil and  
consume fossil fuel. Electric alternatives work very well. It is  
time for a change.  
Thank you for your attention.  
Best regards,  
M.Milton

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:30:17

No Duplicates.

**Comment 282 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joseph  
Last Name: Alvarado  
Email Address: jwalimited@gmail.com  
Affiliation:

Subject: Carbon Reduction...and finaical solvency  
Comment:

We owe it to the planet...get the CDCR expand fire camps to work camps...producing Ag starts and replanting fire burn ares and maintaining all manual labor that can be done locate the camps to areas with vast amounts of non sensitive large public projects that can utilize the labor instead of heavy machinery...move the camp along the corridor of work every twenty miles or so...this can be done for piping projects or road and grid ...desalinization pipelines...small changes like leaf blowers (think they should use electrical chainsaw in fire service? - I think not, probably could not get an electric jaws of life for extrication and life saving instances where time is of the essence.....)and such seem to be more activity than accomplishment or busyness than business but hopefully with this conceptual frame of mind thinking we can upscale the utilization of more optimal resource balancing...Newsom has done a lousy job with many things in between...from Sanctuary state to budget...and soup to nuts ...we do not need to raise the bridge we need to lower the river so to speak...lets think smarter not harder and discern wants from needs and work smarter not harder...for decades the state has balanced its budget by expanding college enrollment increasing tuition and relying on students to balance the budget by incurring student debt...nothing but robbing Peter to pay Paul and saddling future generations with debt load and irresponsible patterns of government spending...this all needs to be reined in...

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:20:45

No Duplicates.

**Comment 283 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jay  
Last Name: Jones  
Email Address: jjones@laverne.edu  
Affiliation:

Subject: Small engine exhaust  
Comment:

Dear Board Members;

I am writing to urge more stringent regulation of mowers, leaf blowers and other small off road engine emissions. I live on a busy street and with the exception of older vehicles and those modified with resonators and I assume bypassing the catalytic converters, the emissions are not as noticeable as those from nearby lawn mowers, leaf blowers and the like. It is clear that this is a health hazard in my already poor air quality home. I strongly urge you to be bold in your decision making. It is indeed a matter of life and well being. Two acquaintances, with out a smoking history, have died of lung cancer in the last three years. Both were life long southern California residents. We have made progress but must continue on this trend. Lives depend on it and the decisions you make are a measure of personal integrity.

Thank you for your attention in this matter.

Sincerely,

Jay Jones

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:27:17

No Duplicates.

**Comment 284 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Craig  
Last Name: Owen  
Email Address: cowen@vencowestern.com  
Affiliation:

Subject: sore2021  
Comment:

Landscapers are already barely making ends meet. its a tough competitive market and this proposed amendment to the small off-road engine regulations would put many out of business. California's electrical infrastructure cannot handle all the additional load of batteries charging every afternoon. Besides the cost of converting equipment inventory to battery powered, the cost of upkeep and maintenance would drive overhead up. Help keep small business alive.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:37:02

No Duplicates.

**Comment 285 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Pegasus Paleolight

Last Name: Walker

Email Address: pegasuswalker01@gmail.com

Affiliation:

Subject: Pollution and Climate Change

Comment:

Ending the sale of polluting lawn and garden equipment is exigent  
in light of the climate crisis.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:49:32

No Duplicates.

**Comment 286 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Merrill  
Last Name: Bobele  
Email Address: MerrillBobele@gmail.com  
Affiliation:

Subject: Gas Leaf Blowers  
Comment:

How many Leaf Blowers are there in California, and the Nation? I do not know, but the manufactures know! That would tell you how much GHG is added to the atmosphere.

What I do know is the amount is greater than it would be if they were banned. That alone would justify banning. But there is another reason as well. Think how much more quiet it would be if electric blowers were used? Rechargeable battery packs could be used instead of heavy gas blowers!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 12:38:30

No Duplicates.

## **Comment 287 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sharon

Last Name: Wandler

Email Address: shwandler48@gmail.com

Affiliation:

Subject: Please Delay the Deadline for Commercial Usage

Comment:

I am writing to you today as a landscape and garden professional and leader of a youth motorsport non profit organization. While I share Governor Newsom and other California policymakers desire to reduce carbon emissions from gas-powered equipment as quickly as is feasible, 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. I implore CARB to delay implementation of this transition for commercial/professional grade equipment to 2026 or beyond.

In addition, 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 highlights 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.

Regarding the youth motorsports, we utilize a small gas powered engine designed for lawn mowers that is recognized nationally, if we are unable to purchase/own/run these engines, then the sport will die out in California. Quarter midgets have been around since before World War II, Capitol Quarter Midget Association in California has operated a dirt track for quarter midgets since 1954, where Jeff Gordon raced. Please consider moving the date to help everyone adjust and reach the same goals.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:06:39

No Duplicates.

**Comment 288 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: J  
Last Name: Yudell  
Email Address: turtlesmurtle@gmail.com  
Affiliation:

Subject: air quality  
Comment:

Don't cave to money - clean air is priceless.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:07:17

No Duplicates.

**Comment 289 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joy  
Last Name: Baker  
Email Address: joydbaker@sbcglobal.net  
Affiliation:

Subject: Zero Emmissions  
Comment:

Transition to Zero Emissions and Clean Air has to begin NOW.  
There is too much delay and this issue should not be tied to  
politics.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:04:06

No Duplicates.

**Comment 290 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Beth  
Last Name: Lander  
Email Address: bkland113@cox.net  
Affiliation:

Subject: Pass CARB  
Comment:

Please help stop our relationship with polluting lawn and garden equipment. Please vote to make all these types of equipment 100% zero emission.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:06:01

No Duplicates.

**Comment 291 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Madeleine  
Last Name: Fisher Kern  
Email Address: metropet2000@yahoo.com  
Affiliation:

Subject: GAS-POWERED BLOWERS  
Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

AND THEY'RE DAMN NOISY ADDING MORE POLLUTION!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:20:35

No Duplicates.

**Comment 292 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jill  
Last Name: Andrews  
Email Address: jillita67@yahoo.com  
Affiliation:

Subject: Ban gas blowers  
Comment:

These is an easy fix. Electric blowers work great.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:20:38

No Duplicates.

**Comment 293 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ted  
Last Name: Young  
Email Address: ted.young@dot.ca.gov  
Affiliation:

Subject: DO NOT BAN GAS-POWERED EQUIPMENT  
Comment:

The state of California has restricted those of us that live here too much. So many restrictions and mandating that people are leaving the state in droves. Petroleum based vehicles and equipment are by far cheaper to run. We already experience rolling blackouts from a lack of clean electrical power. Banning gas power will further impact the states power grid. Politian's need to stop the stupidity now.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:15:02

No Duplicates.

**Comment 294 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bill  
Last Name: Herrera  
Email Address: bherrera@astound.net  
Affiliation:

Subject: Gas blowers  
Comment:

Please vote to reduce the amount of Carbon emissions from gas  
blowers and other engines that continue to add to our dirty air. We  
cannot wait any longer in regard to our air quality.  
Thank you,  
Bill Herrera

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:18:51

No Duplicates.



**Comment 295 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David  
Last Name: Griffith  
Email Address: d.m.griffith@charter.net  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

To Chair Randolph and Members of the Board,

I am a resident of Southern California and I support the adoption of new regulations that will phase out the sale of gas-powered leaf blowers and lawn equipment in California beginning in 2024.

I understand the use of gas-powered leaf blowers and lawn mowers in particular causes health problems, and greatly contributes to California's poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

It's quite clear this regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you for your consideration.

David Griffith

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:21:50

No Duplicates.

**Comment 296 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steve  
Last Name: Lustgarden  
Email Address: slustgarden@gmail.com  
Affiliation:

Subject: no more SORES please!  
Comment:

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

These machines are a menace to our neighborhoods and are highly polluting, endangering public health.

Please act quickly and decisively to rid our state of these machines.

thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:28:34

No Duplicates.

**Comment 297 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Chris

Last Name: Warner

Email Address: chrisawarner@me.com

Affiliation:

Subject: Small Off-Road Engine Regulation

Comment:

Please pass the Small Off-Road Engine Regulation and help us have cleaner air.

Thank you!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:36:13

No Duplicates.

**Comment 298 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David

Last Name: Yanowitz

Email Address: david.yanowitz@protonmail.com

Affiliation:

Subject: We Need Zero Emission Leaf Blowers Now!

Comment:

Although they exist, people continue to use gas powered leaf blowers which emit much more pollution than the average automobile.

With global warming now apparent, it is insane for us NOT to end the use of gas-powered leaf blowers right now. No more delays. And, it needs to be enforceable. Currently, there is no enforcement!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:38:07

No Duplicates.

**Comment 299 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: B

Last Name: Sandow

Email Address: [bysandow@gmail.com](mailto:bysandow@gmail.com)

Affiliation:

Subject: Air quality

Comment:

Pass the proposed Small Off-Road Engine Regulation to end the sale of polluting lawn and garden equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:49:16

No Duplicates.

**Comment 300 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Shirley  
Last Name: Harris  
Email Address: wallypup1637@gmail.com  
Affiliation:

Subject: Leaf Blowers  
Comment:

Leaf blower emissions are toxic and should be banned.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:47:06

No Duplicates.

**Comment 301 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Norma  
Last Name: Fritsche  
Email Address: nafritsche@gmail.com  
Affiliation:

Subject: Small off-road engine regulations  
Comment:

I am a user of small off-road engine home machines but am also a strong supporter of making our environment as clean as possible. Clean air is critical both to our environment and for the health of our citizens. I would gladly replace the machines I have for use around my home if there were clean air options available. Setting that as an aim for CA I believe is an important step to take.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:45:44

No Duplicates.

**Comment 302 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kenneth  
Last Name: Batchelor  
Email Address: randybatchelor@gmail.com  
Affiliation:

Subject: pass the proposed Small Off-Road Engine Regulation to end the sale of polluting lawn  
and g

Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:  
\$8.8 billion in health insurance benefits through 2043  
892 premature deaths avoided  
438 fewer emergency room visits for asthma  
311 fewer hospitalizations for respiratory and cardiovascular issues

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 13:58:30

No Duplicates.



**Comment 303 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gay  
Last Name: Infanti  
Email Address: ginfanti@comcast.net  
Affiliation:

Subject: End Use of Gas Powered Leaf Blowers and Other Similar Equipment  
Comment:

In my neighborhood, gardeners daily use noxious smelling equipment that is harmful to everyone. The exhaust is so bad one can't keep windows open. I have asthma, which is greatly exacerbated by the gas exhaust. These also contribute substantially to climate change. Please outlaw the use of this equipment. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:08:44

No Duplicates.

**Comment 304 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Darrell

Last Name: Clarke

Email Address: darrell@dclarke.org

Affiliation:

Subject: Support for California's transition to clean lawn care equipment

Comment:

I am a Pasadena, California resident and I strongly support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024, plus reduce the incessant noise of gas-powered equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:12:07

No Duplicates.

**Comment 305 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Diana  
Last Name: Duncan  
Email Address: diana@styledetective.com  
Affiliation: Ms.

Subject: zero emission  
Comment:

It is time that we get rid of all gasoline powered small machines.  
Please take action.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:01:16

No Duplicates.

**Comment 306 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Scott  
Last Name: Smith  
Email Address: ssmith@bioniclandscape.com  
Affiliation:

Subject: Please Delay the Deadline for Commercial Usage  
Comment:

I am writing to you today as a landscape and garden professional.  
No more time is necessary. This requirement should have been met  
years ago. Enforce the law now.

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 307 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Laura  
Last Name: Lind  
Email Address: laurallind@msn.com  
Affiliation:

Subject: Gas powered tools  
Comment:

Please require that leaf blowers and other small tools no longer use gasoline. We need to do everything we can to slow climate change.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:44:45

No Duplicates.

**Comment 308 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gary  
Last Name: Costamagna  
Email Address: pnjcosta@gmail.com  
Affiliation:

Subject: Please Delay the Deadline for Commercial Usage  
Comment:

I am writing to you today as a residential landowner living on ten acres in the urban interface. The use of gasoline powered chainsaws chipper pole saws weed eaters and mowers are key in maintaining a fire safe landscape surroundings protecting my residential dwelling. I share Governor Newsom and other Californians. However, a two-year timeline is simply too expensive and fast a transition for residential home owners such as myself to replace all of our equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:50:48

No Duplicates.

**Comment 309 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jeff  
Last Name: Thayer  
Email Address: scubapong@yahoo.com  
Affiliation:

Subject: SORE Regulations  
Comment:

I strongly support the small off-road engine regulations. We must act now to save our planet from CO2. That includes getting rid of all internal combustion engines.

Thank you for your time and consideration.

Sincerely,  
Jeff Thayer

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:16:24

No Duplicates.

**Comment 310 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Connie

Last Name: Rogers

Email Address: jrogers@garlic.com

Affiliation: Gilroy Growing Smarter

Subject: Noise and Air Pollution

Comment:

Please vote to phase in Zero Emission small off road engines. We are eager to get rid of the horribly noisy and air polluting engines now used.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 14:54:24

No Duplicates.



**Comment 311 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Barbara

Last Name: Poland

Email Address: catsdogsnroses@hotmail.com

Affiliation:

Subject: leaf blowers

Comment:

Leaf blowers are dirty, loud and adding to the very pollution we are trying to eliminate that causes the every increasing danger from climate disruption.

It's way past time to stop the potential destruction of life on our home.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:06:49

No Duplicates.

**Comment 312 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John

Last Name: Wagner

Email Address: jwagner1947@hotmail.com

Affiliation:

Subject: Zero Emissions

Comment:

It's time to save the planet. Time to phase out carbon spewing  
small off-road engines.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:20:38

No Duplicates.

**Comment 313 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Lynn  
Last Name: Locher  
Email Address: lelocher@comcast.net  
Affiliation:

Subject: Leaf blowers  
Comment:

The current leaf blowers provide noise and air pollution. We need pollution free leaf blowers for all future leaf blowers and to phase out the gas leaf blowers that are currently being used to control climate change.

Lynn Locher

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:24:59

No Duplicates.

**Comment 314 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Patrick A.

Last Name: Sigala

Email Address: patricksigala@aol.com

Affiliation:

Subject: proposed amendments to small off-road engine regulations

Comment:

Please work to stop polutting the Air. Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:16:03

No Duplicates.

**Comment 315 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robert

Last Name: Ricewasser

Email Address: rbricewasser@aol.com

Affiliation:

Subject: Zero emission SOAR Engine Regulations:

Comment:

Leaf blowers, hedge trimmers, weed wackers, lawn mowers, edgers, vacuums, etc. should all transition to zero emissions. There should also be a decibel limit on the amount of noise produced by this equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:33:42

No Duplicates.

**Comment 316 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Nancy  
Last Name: Keleher  
Email Address: pebbles@humboldt1.com  
Affiliation:

Subject: Leaf blowers  
Comment:

Frankly, I think leaf blowers should be outlawed totally. They are loud and stupid. What happened to raking? But if you have to have them, they should not pollute. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:45:50

No Duplicates.

**Comment 317 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elizabeth  
Last Name: Potter  
Email Address: epotter@mills.edu  
Affiliation:

Subject: zero emission leaf blowers  
Comment:

I have asthma which is exacerbated by exhaust from leaf blowers and other machines that use fossil fuels. Also, noisy gas powered leaf blowers ruin the quality of life in our neighborhoods. We need zero emission leaf blowers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:48:25

No Duplicates.

**Comment 318 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joan  
Last Name: Raphael  
Email Address: jlfraphael@yahoo.com  
Affiliation:

Subject: Clean Leaf blowers  
Comment:

We need electric only leaf blowers! Phase them in so the small gardeners aren't out extra money but get rid of the loud polluting ones asap!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 15:53:29

No Duplicates.



**Comment 319 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joe  
Last Name: McLaughlin  
Email Address: jojomclaughlin@yahoo.com  
Affiliation:

Subject: Electric garden equipment  
Comment:

Electric Leaf Blowers are readily available. We should subsidize commercial gardener to purchase and use electric gardening equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:13:34

No Duplicates.

**Comment 320 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Hanck  
Last Name: McClintock  
Email Address: holyhal@live.com  
Affiliation:

Subject: Polluting lawn equipment  
Comment:

Ban all polluting lawn equipment and leaf blowers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:16:24

No Duplicates.

**Comment 321 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: thalia  
Last Name: lubin  
Email Address: thalia@thaliaproductions.com  
Affiliation:

Subject: Small Off-Road Engine Regulations  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you, Thalia Lubin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:19:02

No Duplicates.

**Comment 322 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Barry

Last Name: Zakar

Email Address: bzakar30@gmail.com

Affiliation:

Subject: Ban gas operated leaf blowers!

Comment:

Please ban these noisy, polluting devices. They can be replaced by battery operated leaf blowers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:33:14

No Duplicates.

**Comment 323 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Janet

Last Name: Rezos

Email Address: Woodzos@comcast.net

Affiliation:

Subject: Gas powered leaf blowers and lawn equipment

Comment:

Please outlaw the use of these small engine machines. They pollute the air and endanger the people who use them and everyone within breathing distance.

They are ubiquitous on my street and my neighborhood would be cleaner and quieter without them.

Janet Rezos

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:28:59

No Duplicates.

**Comment 324 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Peter  
Last Name: Kerr  
Email Address: mycomya@gmail.com  
Affiliation:

Subject: Please pass the proposed Small Off-Road Engine Regulation  
Comment:

Dear Chair and Members of the Board,

Gas-powered leaf blowers and lawn mowers are notorious for their pollution and cause numerous health problems and contribute to poor air quality. They must be removed.

I was at my daughter's elementary school at dropoff this morning and there was a maintenance worker blowing leaves as kids were coming into school. Man, was it stinky! The kids couldn't avoid it. I have the same experience coming into work on a regular basis. I feel sorry for the workers who have these pollution machines strapped to their backs for hours at a time, day after day. How can these still be in use in 2021? Much better alternatives exist and must be adopted asap.

Your action on this will help us live better lives.

Thank you,  
Peter

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:30:51

No Duplicates.

**Comment 325 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gregg

Last Name: Lichtenstein

Email Address: gregglichtenstein@gmail.com

Affiliation:

Subject: Support for California's transition to clean lawn care equipment

Comment:

As a California physician, I support the creation and implementation of new rules to eliminate the use of fossil-fuel driven leaf blowers and lawn equipment. Requiring batteries to power this equipment seems light would reduce harmful emissions into both the atmosphere and people's lungs. We need to grab all necessary means to reduce carbon pollution and this seems like low hanging fruit. Help improve air quality, reduce noise (!) and help us meet Paris Accord targets.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 16:52:14

No Duplicates.

**Comment 326 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steve  
Last Name: Schatz  
Email Address: 1jschatz@gmail.com  
Affiliation: retired

Subject: Regulations for Small Off-Road Engines  
Comment:

Small Off-Road Engines are extreme polluters which cause terrible  
respiratory health problems!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:03:05

No Duplicates.



**Comment 327 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elizabeth  
Last Name: Edinger  
Email Address: edingerea@gmail.com  
Affiliation:

Subject: Small Off-Road Engines Regulation  
Comment:

Please pass the Small Off-Road Engines Regulation to end the sale of gasoline-powered lawn mowers and leaf blowers. Our health is threatened by smog, and gasoline-powered garden equipment should have been banned in this state decades ago. I was diagnosed with asthma this year, and I should have the right to breathe clean air.

Attachment: "

Original File Name:

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

No Duplicates.

**Comment 328 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Allison

Last Name: Blair

Email Address: allison\_a\_blair@yahoo.com

Affiliation:

Subject: Small Engines

Comment:

Everyday I hear the loud chainsaws, mowers, blowers and weed whackers going in my neighborhood almost every day. And I smell their exhaust, too. I own and use an electric chainsaw, mower, blower and hedge trimmer, and they work well.

Please consider phasing the loud, polluting small gas engines.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:16:20

No Duplicates.

**Comment 329 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: LD  
Last Name: Anderson  
Email Address: linda@ucsc.edu  
Affiliation: LD Anderson

Subject: Small Off-Road Engine Regulations  
Comment:

Please ban gas fueled lawn and landscape tools

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:31:16

No Duplicates.

**Comment 330 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Cheryl  
Last Name: Schmidt  
Email Address: schmidthaus1@comcast.net  
Affiliation:

Subject: Emissions  
Comment:

All hand held tools should be emission free. They are so widely used throughout the US and contribute heavily to our air pollution. We must take steps to stop pollution for clean air for ourselves and enhance the planet. Please make the right decision to help clean our air.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:22:13

No Duplicates.

**Comment 331 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Saran  
Last Name: K.  
Email Address: sarank@mac.com  
Affiliation:

Subject: Zero emmissions  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:40:20

No Duplicates.

**Comment 332 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Suzanne  
Last Name: Kunstman  
Email Address: tuti\_on\_ice@yahoo.com  
Affiliation:

Subject: leaf blowers  
Comment:

please regulate the use of gas powered, polluting leaf blowers. We  
need zero emission leaf blowers now!

Thank you,  
Suzanne Kunstman

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:43:58

No Duplicates.

**Comment 333 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: c

Last Name: s

Email Address: csoragha@hotmail.com

Affiliation:

Subject: Clean Air!

Comment:

Please help clean our neighborhood air and protect our children by  
passing the Small Off-Road Engine Regulations NOW!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:51:29

No Duplicates.

**Comment 334 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joan

Last Name: Murray

Email Address: jsmurray24@gmail.com

Affiliation:

Subject: We Need Non-polluting Lawn and Garden Equipment

Comment:

Please stop the sale of gasoline-powered lawnmowers, leaf blowers, etc. They pollute the air and contribute to climate change. Also, I personally am sick of having to run and close all my windows when I hear gasoline-powered lawn and garden equipment nearby. I've been using an electric lawnmower for years. Other people can too.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 17:56:25

No Duplicates.



## **Comment 335 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Leigh

Last Name: Adams

Email Address: leighlaughing@gmail.com

Affiliation:

Subject: Leafblowers-ugh!

Comment:

Dear Chair Randolph and Members of the Board, The proper things to say are below. What I want to say is that it is ludicrous that I hear the sound of blowers at work, at play, nap time , ALL THE TIME. I smell their dust and breathe the polluted air that is filled with particulate lead from the gutters, human sputum....contaminated?...stuff we should not be breathing. But worst of all, in this horrendous drought, the mulch and leaf cover are being removed from our soil, drying it out and causing more water to be used. This has to stop!

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:01:47

No Duplicates.

**Comment 336 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bella

Last Name: Silverstein

Email Address: bellasilverstein@yahoo.com

Affiliation:

Subject: Leaf blowers stink up my neighborhood...

Comment:

Please ban polluting leaf blowers. I have to race around the house, slamming shut all the windows on a beautiful day, upstairs and downstairs, whenever one of those CO2-emitting monstrosities is in action. And it happens weekly, courtesy of my HOA, since they are in charge of the landscaping. There's nothing I can do to get them to use zero-emissions leaf blowers. Even with my race-around-the-house routine, I still get those noxious gas fumes inside the house. It takes forever to dissipate --I can't even open the windows for a LOOOOOONG time afterwards, because the gasoline odor lingers. Please help. We need a law. Clean leaf blowers exist.Let's use them exclusively. Ban these polluting machines. We must do everything we can to slow global warming and keep our air clean.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:11:34

No Duplicates.

**Comment 337 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: ralph

Last Name: bocchetti

Email Address: riverglen2816@yahoo.com

Affiliation:

Subject: EV garden equipment

Comment:

We need to make all Garden equipment 100% electric, now!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:34:18

No Duplicates.

**Comment 338 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ellen

Last Name: Gachesa

Email Address: trueromanticlife@gmail.com

Affiliation:

Subject: Leaf Blowers & Wood Burning Fireplaces

Comment:

PLEASE outlaw those hideous, loud, disgusting polluting gas leaf blowers! Everytime I'm outside those nasty things are spewing out FILTHY gas fumes that I have to breathe. This is NOT okay. They are also obscenely LOUD, adding to noise pollution, then they blow their dirt all over the neighborhood into OTHER people's yards, on other people's cars, etc. I SWEEP my driveway - it doesn't take that long with the proper broom.

AND OUTLAW WOOD BURNING FIREPLACES. My neighbor's wood-burning fireplace spews dirty smoke into my kitchen window to pollute and dirty MY home. There are BILLIONS of people on this planet now and wood-burning fireplaces have NO place in our world!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:29:46

No Duplicates.

**Comment 339 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bruce

Last Name: Burns

Email Address: bruce51904@aol.com

Affiliation:

Subject: Zero Emissions for small off road engines

Comment:

These things are toxic and loud. They must be regulated to get  
where we want to be as a State.

We must lead the way for others to follow.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:45:39

No Duplicates.

**Comment 340 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Karen  
Last Name: Guma  
Email Address: guma@sonic.net  
Affiliation:

Subject: leaf blower emissions  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Karen Guma

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:48:56

No Duplicates.



**Comment 341 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Donald

Last Name: Fischer

Email Address: xcountrydon@gmail.com

Affiliation:

Subject: Unhealthy Emissions by leaf blowers and gas-powered mowers

Comment:

I have lived in California for 40 years and it is quite amazing that after all this time with all the regulations that have been passed on air quality during that time, that leaf blowers are still polluting the air in this state and causing noise pollution as well. This state is suppose to be at the forefront of clean energy and yet nothing has ever been done to curb leaf blowers and lawn mowers from their endless pollution in this state.

I moved from the midwest in 1981 to Orange County and one of the first things that I noticed was the noise and pollution of leaf blowers used by the gardeners every week. I had never seen leaf blowers before and here it is 2021 and nothing has changed. It is certainly time to curb them and have them powered by electricity.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 18:49:37

No Duplicates.

**Comment 342 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dan  
Last Name: Morgan  
Email Address: nasaduck@gmail.com  
Affiliation:

Subject: Leaf Blowers  
Comment:

Dear Chair Randolph and Members of the Board,

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality.

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Dan Morgan

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:02:23

No Duplicates.

**Comment 343 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: E.

Last Name: S.

Email Address: eee@aol.com

Affiliation:

Subject: Small off-road engine regulations

Comment:

Please vote to rid the county of all pollution making machines,  
such as weed-wackers,  
leaf blowers, lawn mowers, ets. We should not tolerate the  
pollution they make any more.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:09:36

No Duplicates.

**Comment 344 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Amanda

Last Name: Bloom

Email Address: amandabloo@gmail.com

Affiliation:

Subject: Stop selling gas leaf blowers and small motors

Comment:

We need to move away from dirty fossil fuels. It is time to stop  
selling these polluting motors.  
thank you, Amanda Bloom

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:12:59

No Duplicates.

**Comment 345 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Carol  
Last Name: Cook  
Email Address: cabomail@comcast.net  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

- \$8.8 billion in health insurance benefits through 2043
- 892 premature deaths avoided
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you,  
Carol Cook

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:14:10

No Duplicates.

**Comment 346 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Rodney  
Last Name: Love  
Email Address: rodneylove47@icloud.com  
Affiliation:

Subject: Subject: Support for California's transition to clean lawn care equipment    Message:  
D  
Comment:

Message :

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:31:09

No Duplicates.

**Comment 347 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David  
Last Name: Simon  
Email Address: desimon@earthlink.net  
Affiliation:

Subject: banning gas-powered gardening equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of polluting (and noisy) gas-powered leaf blowers and lawn equipment in California.

This equipment contributes unnecessarily to California's air pollution.

Your own health benefit analysis determined that these new regulations, if adopted, would be most helpful.

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them buy replacement equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:55:14

No Duplicates.



**Comment 348 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kelly  
Last Name: McCormick  
Email Address: kelly.mccorm@gmail.com  
Affiliation:

Subject: Please ban gas powered leaf blowers  
Comment:

\*Every weekday\* there's a gas-powered leaf blower blasting somewhere on my street. I'm so fed up with smelling the exhaust and hearing their drone out my window. Last August, even the week our skies turned black with ash and our AQI was over 400 with particulate pollution, the band of gardeners was out blasting a cloud of ash out of the gutter and back into the air. I felt so disgusted and defeated and I retreated to the room farthest from the street to try to hear my zoom lecture over the noise of the blower and my air purifier.

Gas-powered leaf blowers are a scourge on the environment- the fumes they emit along with the particulate pollution they cause are a major concern for public health as well as environmental safety. Particulate pollution is correlated with a number of negative health impacts including a number of cognitive disorders. The noise pollution they cause is a nuisance to humans in the area (with more people than ever working and schooling from home) but also for animals who rely on acoustic signaling to communicate. The noise level is a stressor for many species.

Thank you for your consideration of this matter

Dr. Kelly McCormick

Please consider a full ban on leaf blowers, but at a bare minimum, a ban on gas-powered leaf blowers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 19:51:55

No Duplicates.

**Comment 349 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John

Last Name: Alexander

Email Address: jondlar4251@yahoo.com

Affiliation:

Subject: Gas Leaf Blowers & Gas Powered Lawn Mowers

Comment:

Simply put, to help lessen and help to reduce global warming as we have more heating of planet baking to frying situations, please end the use of gas powered leaf blowers and gas power lawn mowers

Your help, to help us and thus would set a good example that your agency cares

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 20:08:07

No Duplicates.

**Comment 350 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Andrew

Last Name: Simpson

Email Address: quillenlandscapes@gmail.com

Affiliation:

Subject: gas powered equipment

Comment:

I think it is great to move toward battery powered equipment by 2024. It is all about the manufacturers coming up with the right stuff! Necessity is the Mother of Invention. I would suggest landscape maintenance companies get ahead of the curve as soon as possible and market themselves as going green, rather than continue being rather noisy polluters.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 20:27:51

No Duplicates.

**Comment 351 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: J. Barry  
Last Name: Gurdin  
Email Address: gurdin@hotmail.com  
Affiliation: Self

Subject: All small off-road engines sold in CA should be zero emission.  
Comment:

Dear California Air Resources Board (CARB),

Ensure that 100% of leaf blowers, lawn mowers, weed wackers and other "Small Off-Road Engines" (SOREs) sold in the state are zero emission.

Please pass the proposed Small Off-Road Engine Regulation to end the sale of polluting lawn and garden equipment.

Polluting smoke in air

Message CARB Now

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

Sincerely,  
J. Barry Gurdin, Ph.D.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 20:43:09

No Duplicates.



**Comment 352 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Laura  
Last Name: Sternberg  
Email Address: laura.sternberg@gmail.com  
Affiliation:

Subject: small off-road engine regulations  
Comment:

Please pass the proposed Small Off-Road Engine Regulation to end  
the sale of polluting lawn and garden equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 21:16:58

No Duplicates.

**Comment 353 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alison

Last Name: Hill

Email Address: alisonrhill@comcast.net

Affiliation:

Subject: Zero emission garden equipment

Comment:

It is time to ban the sale of polluting gasoline powered leaf blowers, lawn mowers and other yard machinery. There are pollution free alternatives, and this equipment is a major cause of pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 21:19:59

No Duplicates.

**Comment 354 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jan  
Last Name: Dietrick  
Email Address: jdietrick9@gmail.com  
Affiliation:

Subject: Leaves are called leaves because we're supposed to leave them  
Comment:

We do need to just ban the sale of gas-powered leaf blowers asap, but we need a marketing campaign on behalf of a paradigm-breaking life cycle analysis of leaves. Add up the negative health impacts from the air pollution and noise, and the health benefits from pulling leaves with a rake or pushing them with a broom over to nearby trees or shrubs for mulch. We think CARB doing marketing campaigns to counteract the ridiculous think-alike habits and values promulgated by the marketers of stuff we don't need COULD measurably reduce GHGs. It could be a challenge campaign with other states and nations to see who can decrease the gas-powered leaf-blower population fastest.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 21:13:40

No Duplicates.



**Comment 355 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Scott

Last Name: Peer

Email Address: scottpeer@aol.com

Affiliation:

Subject: Please transition to clean leaf blowers and lawn equipment

Comment:

Gas powered leaf blowers and lawn mowers are huge polluters.

Electric ones work well, I've been using an electric leaf blower for a decade now, and I would never go back.

Please ban the gas ones and help improve our health.

Thanks,

Scott Peer

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 21:42:30

No Duplicates.

**Comment 356 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elizabeth  
Last Name: Berteaux  
Email Address: birdtrax@dcn.davis.ca.us  
Affiliation:

Subject: air pollution  
Comment:

We must do all that we can to eliminate sources of air pollution. The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

Please approve and amend the SORE regulations per the staff recommendation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 21:41:49

No Duplicates.

**Comment 357 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Laura

Last Name: Chinn-Smoot

Email Address: violaura@sonic.net

Affiliation:

Subject: Stop allowing use of fossil fuels tools, change to zero emission.

Comment:

Now is the time to make as many differences to change the course of  
climate change.

Changing our fossil fuel tools to zero emission tools will make a  
great change if everyone makes an effort.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 21:53:39

No Duplicates.

**Comment 358 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Grace  
Last Name: Marvin  
Email Address: g-marvin@comcast.net  
Affiliation: Sierra Club

Subject: Small Off-Road Engine Regulations  
Comment:

This is an urgent issue: please pass the proposed Small Off-Road Engine Regulation to end the sale of polluting lawn and garden equipment. Our state should resume being a good example!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 22:03:21

No Duplicates.

**Comment 359 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alan  
Last Name: Reid  
Email Address: jalanr@gmail.com  
Affiliation:

Subject: Please Delay the Deadline for Commercial Usage  
Comment:

I 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 not fast enough.

Commercial users need to be part of the solution, if they don't like battery powered they can use a rake. Enough is enough.

Please move forward with your initiative.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 22:09:13

No Duplicates.

**Comment 360 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bruce

Last Name: Spring

Email Address: bspring@usc.edu

Affiliation: Univ of Southern California

Subject: Transition to zero emissions for small off-road engines.

Comment:

We are at code red. We must reduce emissions. Thank youi.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 22:09:42

No Duplicates.

**Comment 361 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dennis

Last Name: Allen

Email Address: dallen4191@aol.com

Affiliation: Allen Construction.

Subject: Time to ban gas blowers

Comment:

No more fossil fuel powered gas blowers. They are noisy; they pollute; they contribute to climate change; and they don't do the job well.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 22:12:17

No Duplicates.

**Comment 362 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: STEPHEN  
Last Name: ANDERSON  
Email Address: sca1baa@earthlink.net  
Affiliation:

Subject: Who Needs Gas When Electric Is Better  
Comment:

I am now using Snapper and /Greenworks 80 volt Lawnmowers. My Greenworks edger/weedwacker is better than gas. The 80 volt electric chainsaw is comperable to gas without fumes to get in the way. In short, I think it would be smart to drop all gas lawn equipment. I have done away with all my gas lawn equipment and it is for the better. Gasoline storage is volital and danereous. Why continue this practice?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 22:18:11

No Duplicates.



**Comment 363 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steve

Last Name: Bean

Email Address: knottman@gmail.com

Affiliation:

Subject: Clean air

Comment:

Air is what we have to breathe. Let's keep it clean for health.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 22:49:39

No Duplicates.

**Comment 364 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Diana

Last Name: Morgan-Hickey

Email Address: dianamorgan4@icloud.com

Affiliation:

Subject: Zero emissions!

Comment:

Ensure that Small Off-Road Engines are 100% zero emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 23:02:43

No Duplicates.

**Comment 365 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Susan

Last Name: Perry

Email Address: bigsurunified@gmail.com

Affiliation:

Subject: solar power panels on rooftops program

Comment:

Please encourage continuation of incentives for solar panels on every rooftop.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 23:15:25

No Duplicates.

**Comment 366 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robert

Last Name: Lentz

Email Address: boblentz14@hotmail.com

Affiliation:

Subject: noise

Comment:

we need zero emission leaf blowers now!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-17 23:39:19

No Duplicates.

**Comment 367 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Miriam  
Last Name: Faugno  
Email Address: mfaugnos@gmail.com  
Affiliation: Sierra Club

Subject: Electric Leaf Blowers  
Comment:

No More Fossil Fuels Destroying the Earth-- the Clock is Ticking

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 01:22:49

No Duplicates.

**Comment 368 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jai  
Last Name: Conley  
Email Address: jai54@duck.com  
Affiliation:

Subject: S.O.R.E.s  
Comment:

Many municipalities already have long since banned these. Their sheer quantity adds up and degrades our quality of life. Let's leave the nation in banning these as well.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 01:54:37

No Duplicates.

**Comment 369 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Peter

Last Name: Lee

Email Address: peterboothlee@hotmail.com

Affiliation:

Subject: Small engine Emissions

Comment:

Please go to Zero emissions. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 03:46:19

No Duplicates.

**Comment 370 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Veronica  
Last Name: Jacobi  
Email Address: vjacobi@sonic.net  
Affiliation:

Subject: Small Off-Road Engine, Transition to Zero Emissions  
Comment:

Please ban the sale of polluting off road small engines, leaf  
blowers etcetera, soon. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 03:55:00

No Duplicates.



**Comment 371 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael  
Last Name: Roberts  
Email Address: novograbenof@hotmail.com  
Affiliation:

Subject: Small engine zero emissions  
Comment:

We need to stop allowing internal combustion engines in our environment.  
They assault our hearing, our breathing, and also damage our Earth and water.  
If we do not change now when will we?  
We do not have the luxury of time, we need to act now for the very survival of life on this one and only home of ours.  
Please make the positive changes we need.  
No dollar amount can outweigh our environment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 05:22:08

No Duplicates.

**Comment 372 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elizabeth

Last Name: Bell

Email Address: Ebnaturegirl@gmail.com

Affiliation:

Subject: Ban gas leaf blowers

Comment:

They are low hanging fruit in the fight against carbon emissions,  
so ban them now! A huge noise problem for everyone. Bettervelectric  
technology is here now! Get rid of those terrible machines

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 06:54:50

No Duplicates.

**Comment 373 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Margaret

Last Name: Lirones

Email Address: margaret.lirones@usa.net

Affiliation:

Subject: Zero emission small engines

Comment:

This is low-hanging fruit. Lawn mowers, weed whackers, and leaf blowers are used every day in our neighborhoods. They don't travel long distances, but they emit as much pollution as cars. There is no reason they cannot be all electric. Landscaping companies that use these tools all day can stock extra batteries and replace them throughout the day. Homeowners who use them occasionally can charge them at home.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 06:59:43

No Duplicates.

**Comment 374 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Blaze

Last Name: Bhence

Email Address: bbhence@yahoo.com

Affiliation:

Subject: Pollution from fossil fuel-burning products

Comment:

Please consider air and noise pollution when approving the use of fossil fuel-burning products. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 07:06:14

No Duplicates.

## **Comment 375 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tavit

Last Name: Karabetyan

Email Address: tavitk@hotmail.com

Affiliation:

Subject: New small engine regulations

Comment:

I am writing to you today as a concerned constituent in opposition to CARB's proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers. Please submit these comments to the docket for the CARB SORE2021 rulemaking.

Moving forward with banning small engine powered equipment in 2024 would have numerous negative impacts on emergency responders, landscapers, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial, government and residential customers they service, at a time when local businesses are already reeling from the catastrophic effects of a global pandemic.

These proposals would drastically limit equipment choices for professional landscape contractors and outdoor power equipment dealers across California. We are small businesses who rely on small engine powered equipment every day as cost-efficient and high-performing solutions to install and maintain living landscapes and green spaces in communities throughout the state, and maintain our state's critical infrastructure. Equipment choices and supply are already limited due to worldwide supply chain disruptions caused by COVID-19, and we do not yet see any indications of recovery and return to normal supply and demand.

Battery powered technology is also not appropriate for all applications and all users. Many rural areas lack the infrastructure needed to charge, transport safely and recycle battery powered equipment - and this infrastructure will not exist at the scale necessary to meet the state's accelerated timelines. And, battery powered equipment is simply not a viable option for many critical services, like fuel mitigation, infrastructure/utilities maintenance and tree care and clearing services that depend on small engine-powered equipment to keep our citizens and infrastructure safe.

While I appreciate the efforts of legislators and CARB to address California's air quality needs, the small engine-powered equipment category is a comparatively minimal contributor to the state's emissions. Further, the living landscapes our equipment is used to install and maintain contribute to tangible environmental benefits, including reductions in the heat island effect, carbon sequestration, trapping dust and particulate matter, providing habitat for pollinators, and producing oxygen. Our gasoline powered

products are also needed to combat the catastrophic toll that fires and other natural disasters have taken on our environment and communities in California.

With this in mind, I respectfully request CARB postpone efforts to ban small engine powered equipment until cost and performance of and infrastructure for comparable electric powered equipment meet commercial, emergency, and rural residential use needs. A delay in implementation would allow the world's supply chain to recover from the worldwide pandemic that has disrupted production of all types of equipment - including both battery and gas powered; and would allow time to develop solutions for our critical infrastructure workers who require gas powered equipment for their services. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 08:00:05

No Duplicates.

## **Comment 376 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Philippe

Last Name: Sukyas

Email Address: PHILIPPE.SUKYAS@GMAIL.COM

Affiliation:

Subject: New small engine regulations

Comment:

I am writing to you today as a concerned constituent in opposition to CARB's proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers. Please submit these comments to the docket for the CARB SORE2021 rulemaking.

Moving forward with banning small engine powered equipment in 2024 would have numerous negative impacts on emergency responders, landscapers, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial, government and residential customers they service, at a time when local businesses are already reeling from the catastrophic effects of a global pandemic.

These proposals would drastically limit equipment choices for professional landscape contractors and outdoor power equipment dealers across California. We are small businesses who rely on small engine powered equipment every day as cost-efficient and high-performing solutions to install and maintain living landscapes and green spaces in communities throughout the state, and maintain our state's critical infrastructure. Equipment choices and supply are already limited due to worldwide supply chain disruptions caused by COVID-19, and we do not yet see any indications of recovery and return to normal supply and demand.

Battery powered technology is also not appropriate for all applications and all users. Many rural areas lack the infrastructure needed to charge, transport safely and recycle battery powered equipment - and this infrastructure will not exist at the scale necessary to meet the state's accelerated timelines. And, battery powered equipment is simply not a viable option for many critical services, like fuel mitigation, infrastructure/utilities maintenance and tree care and clearing services that depend on small engine-powered equipment to keep our citizens and infrastructure safe.

While I appreciate the efforts of legislators and CARB to address California's air quality needs, the small engine-powered equipment category is a comparatively minimal contributor to the state's emissions. Further, the living landscapes our equipment is used to install and maintain contribute to tangible environmental benefits, including reductions in the heat island effect, carbon sequestration, trapping dust and particulate matter, providing habitat for pollinators, and producing oxygen. Our gasoline powered

products are also needed to combat the catastrophic toll that fires and other natural disasters have taken on our environment and communities in California.

With this in mind, I respectfully request CARB postpone efforts to ban small engine powered equipment until cost and performance of and infrastructure for comparable electric powered equipment meet commercial, emergency, and rural residential use needs. A delay in implementation would allow the world's supply chain to recover from the worldwide pandemic that has disrupted production of all types of equipment - including both battery and gas powered; and would allow time to develop solutions for our critical infrastructure workers who require gas powered equipment for their services. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 08:01:48

No Duplicates.



## **Comment 377 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Frank

Last Name: Carson

Email Address: kpipis@carson1975.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: 2021-11-18 08:02:49

No Duplicates.

**Comment 378 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kevin  
Last Name: Washington  
Email Address: [kwashington@itw.com](mailto:kwashington@itw.com)  
Affiliation:

Subject: SORE Proposed Regulation Comments  
Comment:

Please find attached comments for ITW Welding.

Attachment: '[www.arb.ca.gov/lists/com-attach/680-sore2021-Bm9WJAB2UFxQIVM2.pdf](http://www.arb.ca.gov/lists/com-attach/680-sore2021-Bm9WJAB2UFxQIVM2.pdf)'

Original File Name: ITW Welding Comment to CARB SORE Amendments\_FINAL 111521.pdf

Date and Time Comment Was Submitted: 2021-11-18 08:11:06

No Duplicates.

**Comment 379 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Shan  
Last Name: Magnuson  
Email Address: Shanny@sonic.net  
Affiliation:

Subject: Zero emission leaf blowers  
Comment:

Please do everything in your power to prohibit gas powered leaf blowers. Not only do they pollute the air, they are also sound polluters. Thank you for your support and all your good work protecting our air quality.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 08:20:12

No Duplicates.

**Comment 380 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Noreen

Last Name: Weeden

Email Address: NOREEN@NATURETRIP.COM

Affiliation: Nature Trip

Subject: Stop gas powered landscaping equipment

Comment:

Climate change is happening all around us. Now is the time to end gas powered landscaping equipment including leaf blowers and lawn mowers and other.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 08:26:08

No Duplicates.

## **Comment 381 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mary  
Last Name: Ames  
Email Address: amesink@earthlink.net  
Affiliation:

Subject: In support of transition to zero-emissions lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new Small Off-Road Engine (SORE) regulations that will phase out the sale of highly-polluting, gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of this equipment causes numerous health problems, and contributes to California's poor air quality. Because our state continues to fail to meet national air quality standards, we must do everything in our power to reduce the use of fossil fuels -- in engines large and small.

CARB's own public health benefit analysis determined that, in addition to saving billions on health insurance in the next two decades, these regulations will:

- prevent 892 premature deaths,
- reduce asthma-related emergency room visits by 438, and
- result in 311 fewer hospitalizations for respiratory and cardiovascular issues.

It is important that these regulations be introduced and enforced in a way that prevents small, proprietor-owned landscapers from being put out of business. To that end, the California Legislature has appropriated \$30 million for your agency to distribute to small proprietor landscapers to enable them to transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy-back programs already in effect under the auspices of air districts throughout the state. You must see that these subsidies and programs are effective and even handed so that no small landscaping business is harmed by the regulations.

The SORE regulations will improve air quality, improve human health, save lives, and slow climate change.

I, therefore, urge you to approve and amend the SORE regulations in accordance with the staff recommendation.

Thank you for your consideration of my comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 08:32:23

No Duplicates.

**Comment 382 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: marin  
Last Name: villalpando  
Email Address: marin@zankerrecycling.com  
Affiliation:

Subject: small off road gas engines  
Comment:

Changing from gas motors to electric motors is great.  
one thing I notice the state is not opening new renewable energy  
plants like the ones using wood biomass to generate electricity.  
more electric cars more electric equipment great.  
power outages and power roll outs on neighborhoods who is going to  
be without electricity.  
Is the state of California ready to step up and open new electric  
plants or we have to rely on solar panels.  
Even Tesla can make panels fast enough to keep up with the energy  
demand.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 09:10:13

No Duplicates.



**Comment 383 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Arthur

Last Name: Molho

Email Address: aimolho@gmail.com

Affiliation:

Subject: Transition to zero emissions small off-road engines

Comment:

With a reasonable period to transition -2024- small engines which pollute so greatly should stop being sold in CA. Millions will remain in service for a number of years but will Wear Out as all gas engines do and should then be replaced with electric options. The sad reality is that we rich nations have put out the largest amount of Co2 and other greenhouse gases and MUST take action before our world becomes a hell! Economics of jobs using these engines may need some future tax incentives to help the transitions, instead of paying oil producers so many write-offs!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 09:42:28

No Duplicates.

**Comment 384 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: michael  
Last Name: rifkind  
Email Address: rdokarma@earthlink.net  
Affiliation:

Subject: CARB / Emissions limits  
Comment:

THE cleaner the better...BUT, the sources of "alternate power" need  
be non-destructive as possible as well....

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 09:56:44

No Duplicates.

**Comment 385 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steve  
Last Name: Wolfe  
Email Address: wolfejs8888@gmail.com  
Affiliation:

Subject: Gas Leaf Blowers/Small Gas Engines  
Comment:

Clerk of the Board

I realize the technology is evolving, but today there are many gas driven units that could easily be replaced by electric power. Leaf Blowers are an example. I own one and they work quite well as does my electric lawnmower and my electric hedge trimmer; and the list goes on.

As such, please consider phasing out small gas engines in our State. We would all benefit from it.

Thank you,

J S Wolfe

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 09:52:45

No Duplicates.

**Comment 386 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kimberly  
Last Name: Ryan  
Email Address: kimryan001@gmail.com  
Affiliation:

Subject: pass the proposed Small Off-Road Engine Regulation  
Comment:

Dear Board Members -

As an East Oakland resident and environmental scientist, I have witnessed more air quality problems that anywhere else I have lived in the United States.

Ten years ago in the city of Charleston, South Carolina, we worked to create a trade-in incentive for local residents to turn in their gas-powered lawn equipment in exchange for credits to buy electric. This had a profound impact on our neighborhood air quality!

With the proposition of the SORE regulation, the Board has an opportunity to have an even greater impact on the air quality in our local communities. Please pass this regulation so we no longer have to close our windows and doors due to the toxic exhaust fumes of garden equipment polluting our homes!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 10:01:17

No Duplicates.

**Comment 387 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tom  
Last Name: Heaviland  
Email Address: thomas.heaviland@brightview.com  
Affiliation: BrightView Landscape

Subject: Ban on Gas Powered Equip by 2024  
Comment:

CARB-

As a landscape industry, we are in favor of moving more toward a sustainable, more environment friendly use of power equipment. As contractors, we clearly understand the important role we play and how our efforts to reduce gas emissions is critical to a long term solution in the fight against global warming. Where we differ is the 2024 timeline to make this abrupt and radical transition. The cost of gas vs. electric is extremely prohibitive for small contractors who make up the majority of businesses in this state. There also needs to be greater improvement in the technical development of electric equipment where it is of equal performance or better than current gas powered units. Its important to listen to all voices and bring all parties together to formulate a viable plan which is a win win for the State, Contractors and Manufacturers. Thank you.  
Tom Heaviland  
BrightView Landscape

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 09:50:03

No Duplicates.

**Comment 388 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ketti

Last Name: Kupper

Email Address: Ketti@ConsciousLivingLandscapes.com

Affiliation: APLD

Subject: Gas Powered Equipment Response

Comment:

I support eliminating gas powered equipment. Not only do they pollute our air quality, that equipment is a significant disruptor of peace and quiet for way beyond the clean up area. No one likes the sound and people nearby can't wait for it to be over quickly. The sound and air is also bad for the workers.

I know it will increase some costs in the short term for landscapers but the long term benefit for the neighborhoods and the planet is worth it. I've already spoken with HOA contractors that are currently upgrading methods and equipment because their large unit contractors won't allow them now.

Maintenance people in particular are often expected to hold to low pricing from years ago. I've found that customers still expect their below market pricing to continue indefinitely. The new standards will allow companies to update pricing in a way that customers can understand.

I'm a landscape designer, not a licensed contractor. I work full time with licensed contractors and also non licensed gardeners.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 10:00:35

No Duplicates.

**Comment 389 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Marcia &#128692;

Last Name: Flannery

Email Address: marciaflannery@stanfordalumni.org

Affiliation:

Subject: gas powered yard cleaning quipment

Comment:

i am a calif. resident & am writing to ask you to phase out all  
high polluting gas powered leaf blowers & lawn equipment a.s.a.p.  
thanks

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 10:37:41

No Duplicates.

**Comment 390 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Scott

Last Name: Sherman

Email Address: scott@avidgreen.com

Affiliation: AvidGreen Landscaping

Subject: Gas blowers

Comment:

Great idea to eliminate them. They put out abundant air and noise pollution. From early morning to nights and weekends. I know it will be a burden for many, financially, to purchase electric blower systems. The prices are ridiculously high for electric systems that work through the day for larger landscape maintenance sites. But, transition to non-gas systems is crucial now to our environment, neighborhood peace and quiet and global warming.

Landscapers would be wise, if they can afford it, to lead and market themselves as true stewards of the environment. If grants or subsidies were available, then professionals and gardeners nationwide will transition faster. Plus, citizens should encourage this rapid transition. The payoffs in air quality, greatly improved peacefulness in neighborhoods and global warming will be profound.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 10:45:14

No Duplicates.



**Comment 391 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jennifer

Last Name: Russell

Email Address: jrrptr@comcast.net

Affiliation:

Subject: Small off-road engine regs

Comment:

I urge you to ban small engines like gas-powered leaf blowers, lawn mowers, weed eaters, etc. as a step toward lessening the ever growing amount of carbon dioxide in our atmosphere. The clock is ticking and everyone needs to do whatever they can to halt green gas levels.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 11:17:26

No Duplicates.

**Comment 392 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Leigh

Last Name: Hall

Email Address: leigh.hall@sbcglobal.net

Affiliation:

Subject: Gas powered leaf blowers

Comment:

I urge you to move ahead with removing gas powered leaf blowers from our neighborhoods. They not only pollute the air, use fossil fuels and denigrate our environment, but also are so noisy that some days around our house it feels as though we are in the middle of a large factory.

Thanks for considering this important issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 12:33:06

No Duplicates.

**Comment 393 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Corwin  
Last Name: Zechar  
Email Address: ernfast@gmail.com  
Affiliation:

Subject: Small Off-Road Engine Regulation  
Comment:

Hi -  
Please pass the small off-road engine regulation. My wife is immunocompromised. We live in Richmond, California. We are already dealing with air pollution from coal at Port Richmond and from the Chevron refinery. We cannot afford to continue enduring air pollution from all of our neighbors "sweeping" their leaves and debris via leaf blowers or mowing their lawns (which they should not have anyway because of the drought) with gas powered lawn mowers.

Thanks for your help.

Corwin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 12:49:26

No Duplicates.

**Comment 394 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Harold  
Last Name: Thomas  
Email Address: hthomasattorney@aol.com  
Affiliation:

Subject: Small Off-Road Engine Regulations -Lawn Equipment  
Comment:

I support the ending of the sale and use of petroleum powered lawn equipment in California for several important reasons. One we are burning our forests down because of climate change driven extreme heat. The Caldor and Dixie fires are Exhibit 1 and 2. Second, the emissions from both petroleum by-products and PM 2.5 mobilized all summer and fall are the source of long terms adverse health effects. The epidemological evidence is persuasive and combined with seasonal fire smoke, are the source of early mortality. Mortality for the operators has become an environmental justice issue.

Finally there is noise and more noise with the clouds of road dust entrained by weekly gas fired lawn blowers. Climate change is killing our forests and the toxic dust is harming us. Please act in the public interest. Thank you s/ Harold M. Thomas

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 13:29:19

No Duplicates.

## **Comment 395 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Matthew

Last Name: Cannon

Email Address: Matthew.Cannon@Brightview.com

Affiliation: Brightview Landscape Services

Subject: Reasonable Time Frame to Transistion

Comment:

While I may not be in CA, I work for a landscape contracting company that services a large portion of the state. Also many legislative items that CA does affects and tends to influence other states. With that said, we at BrightView and frankly most landscape contracting industry do care about the environment and are constantly finding ways to lower our impact. Many of us, including BrightView have already embraced alternative fuel machinery and electric. However given the entire industry has been using combustion engines that run of diesel, unleaded, and mix for well over a 100 years it will take time to retool our fleets, crews, business models, pricing to customers and vendors, and train our employees. The landscape contracting industry is open to moving to electric power sources. However we have to change how we setup our trucks in trailers in order to be able to store batteries, charging stations, solar panels, and buy all new equipment. We also have to stock new spare parts, tools, and re train mechanics. This is a very large investment to make. Also we need to analyze our costs and efficiencies with this equipment and make sure we are charging our customers accordingly otherwise we risk going out of business and putting more people out of work. All this items take a lot of time to analyze, organize, spend, and assemble to be able to continue to same level of service to our customers. In closing a 2 year deadline to make all the above happen is simply not possible. It does not make business sense nor industry sense to make that change that fast. Our vendors would not even be able to fulfill orders. Also with this fast deadline this will push companies to simply buy their products out of state, thus decreasing commerce and the economy within CA and putting an undue burden on the vendors out of state and that in turn will put a burden on the purchasers in those states. That in turn won't fix your problem. Give the industry a reasonable time frame to adjust, adapt, and evolve. Lastly many of the landscape contractors are not large multi million companies. Meaning they simply do not have the capitol to change their fleets over to fully electric either at all or in this timeframe. Please consider providing a more reasonable deadline. We landscape industry and the manufacturers of these products do welcome this change however just in a more organic reasonable time. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 14:30:19

No Duplicates.

**Comment 396 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: GARY

Last Name: SMITH

Email Address: garysmith@smithpipesupply.com

Affiliation: SMITH PIPE & SUPPLY

Subject: Small Off-Road Engine Regulations

Comment:

These regulations will destory Mexican american familys 1000's of  
jobs lost ..... please don't do this.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 14:45:26

No Duplicates.

**Comment 397 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Deb  
Last Name: Zak  
Email Address: trubbledog@aol.com  
Affiliation:

Subject: Air quality  
Comment:

Why would you not want to do everything in your power to make a cleaner more livable environment?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 15:38:20

No Duplicates.



**Comment 398 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alfonso

Last Name: Valadez

Email Address: alfonso\_valadez@kernhigh.org

Affiliation: Assistant Director Maintenance KHSD

Subject: small gas powered grounds equipment

Comment:

Working as a grounds men for the Kern High School District myself the idea of trying to get rid of the small gas engine is a horrible idea. Battery powered equipment is good for home owners not for commercial work. Longevity and the run time of the equipment is not even on the same level. I have done many demo's on battery powered equipment and this would be a big mistake if California decides to go this route.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 15:33:58

No Duplicates.

**Comment 399 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Erin  
Last Name: Roeder  
Email Address: Erin@42inc.com  
Affiliation:

Subject: Phase Out Gas Leaf Blowers and Lawn Mowers!  
Comment:

These have got to go! The smell, the noise, the pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 15:57:46

No Duplicates.

**Comment 400 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Cathryn  
Last Name: Rakich  
Email Address: crakich@surewest.net  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024. Please vote to approve and amend the SORE regulations.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 16:20:11

No Duplicates.

**Comment 401 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Christie  
Last Name: Reed  
Email Address: creed44@comcast.net  
Affiliation: Landscaper

Subject: two stroke engines  
Comment:

Dear Sir/Madam,

I'm a landscape contractor who feels that two stroke engines should be quickly phased out. They are super polluters, are often poorly maintained, and I would assert not safely used by the majority of operators. All in all the cost of operating these machines is inexpensive only in the short run. I would urge you all to phase them out quickly and consider any programs in your power to create to help those who cannot afford safer and cleaner equipment.

Thank you,  
Christie

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 16:28:45

No Duplicates.

**Comment 402 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Brandon

Last Name: Baxter

Email Address: bbaxter@kernturfsupply.com

Affiliation:

Subject: Power equipment 2024

Comment:

Push back the deadline 4 years

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 16:43:40

No Duplicates.

**Comment 403 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Brandon

Last Name: Baxter

Email Address: bbaxter@kernturfsupply.com

Affiliation:

Subject: Power equipment 2024

Comment:

Push back the deadline 4 years

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 16:43:40

No Duplicates.

**Comment 404 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jaime

Last Name: Rios

Email Address: jimr@riosdesign.com

Affiliation:

Subject: Proposed Amendments to the Small Off-Road Engine Regs

Comment:

As a Landscape Architect, many of the landscape contractors that we work with have expressed to us that the proposed banning of gas powered engines of 25HP or less will have a crippling affect on their businesses. The proposed battery operated equipment is extremely expensive and require multiple batteries to power the equipment throughout the day. In addition, these batteries are not long lived, so they will ultimately end up in landfills contaminating ground water which California desperately needs to protect as a secondary backup water source during extreme drought situations. The financial impact of this bans will hurt businesses, their employees, families and their clients. We ask that this ban be postpone until long term sustainable solutions are developed. The technology is just not there yet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 17:04:45

No Duplicates.

**Comment 405 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jessica

Last Name: Thompson

Email Address: jessica@gggojai.com

Affiliation: Green goddess gardens, Inc

Subject: electric vs gas

Comment:

Our town has banned gas powered small engines and the availability of electric substitutions has been good. We are using half gas and half electric now. The transition has been uncomfortable, but now the boys like the cleanliness of the electric machines. The power is not as strong and a combustion engine, but at least it is better than hand tools! We use mainly hand tools but on larger lawns and hedges a machine is great. The client just has to know that work will take a bit longer with hand tools, but most feel good not listening to loud 2 cycle engines outside their windows. Better, stronger machines are on the table now, our beloved machines will always be with us!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 17:41:20

No Duplicates.



**Comment 406 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gerry

Last Name: Williams

Email Address: goodleaders@roadrunner.com

Affiliation:

Subject: regulating allowable engine exhaust

Comment:

All engines must be or become either electric or hydrogen powered.  
We must save the earth from more carbon in the air due to use of  
fossil fuels.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 17:49:13

No Duplicates.

**Comment 407 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Henry  
Last Name: Morgen  
Email Address: hjmla@sbcglobal.net  
Affiliation:

Subject: Support for Changes to Small Off-Road Engine Regulation  
Comment:

We need to transition to non-fossil based energy as rapidly as possible without destroying the near-term economy. Please do all you can to make changes to encourage this transition. Furthermore, this change will also help with noise pollution. THANKS!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 19:30:35

No Duplicates.

**Comment 408 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jill  
Last Name: Dunham  
Email Address: jillbd@gmail.com  
Affiliation:

Subject: phase out gas leaf blowers and lawn mowers  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Jill Dunham, PhD

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 20:32:38

No Duplicates.

**Comment 409 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mark  
Last Name: Rhomberg  
Email Address: markjrhomberg@gmail.com  
Affiliation:

Subject: Transition to ZERO Emissions  
Comment:

Dear Clerk of the Board:

Time is running out for our planet to avoid the most catastrophic effects of climate change. Please ensure that 100% of leaf blowers, lawn mowers, weed wackers and other "Small Off-Road Engines" (SOREs) sold in the state are zero emission by passing the proposed Small Off-Road Engine Regulation.

Thank you!  
Mark Rhomberg

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 21:30:22

No Duplicates.

## **Comment 410 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Suzanne  
Last Name: Hume  
Email Address: S@CleanEarth4Kids.org  
Affiliation:

Subject: Please approve the changes to SORE regulations as recommended by staff  
Comment:

Chair Randolph and Members of the Board,

CleanEarth4Kids.org supports the adoption of new regulations to phase out the sale of gas-powered leaf blowers, lawn mowers and other lawn equipment in California by 2024.

Please approve the changes to SORE regulations as recommended by staff.

According to CARB's own research, gas-powered equipment like leaf blowers and lawn mowers are a major source of air pollution:  
\*1 hour of a gas-powered mower puts out the same emissions as driving a 2017 Toyota Camry from Los Angeles to Las Vegas and 1 hour of the best-selling leaf blower is the same emissions as driving from Los Angeles to Denver  
\*Leaf blowers and other small gas engines will create more ozone pollution than all the passenger cars in California

Air pollution is linked to heart, lung and neurological conditions like dementia, Alzheimer's and Parkinson's. CARB must take action.

The public health benefit analysis by CARB shows these new regulations would result in:  
\*\$8.8 billion in health insurance savings through 2043  
\*892 premature deaths avoided  
\*438 fewer asthma related emergency room visits  
\*311 fewer hospitalizations from respiratory and cardiovascular issues

California has allocated \$30 million for CARB to help small landscapers transition to zero emission equipment. This is in addition to existing subsidies and buy back programs in air districts.

These regulations will improve air quality, help to slow the climate crisis, improve human health, and save lives. Please vote yes.

Thank you!

Suzanne M. Hume  
S@CleanEarth4Kids.org

CleanEarth4Kids.org

Attachment: 'www.arb.ca.gov/lists/com-attach/734-sore2021-VjVXMF0uUmNQCQZ1.pdf'

Original File Name: CARB SORE Comment Nov 18.pdf

Date and Time Comment Was Submitted: 2021-11-18 21:58:40

No Duplicates.

**Comment 411 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dan

Last Name: Henneberger

Email Address: enterdansworld@yahoo.com

Affiliation: Salutation\*

Subject: gas powered Leaf blowers

Comment:

Gas engine Leaf blowers. Why are they still allowed? Much too much pollution. I thought California did not allow them many years ago. I still hear them, smell them and get aggravated by them. Wake up and get rid of them or the people will get rid of you by voting you out of office.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-18 21:50:55

No Duplicates.



**Comment 412 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: C.

Last Name: Martinez

Email Address: camiz@sbcglobal.net

Affiliation:

Subject: We Need Zero Emission Leaf Blowers Now

Comment:

Pass the proposed Small Off-Road Engine Regulation to end the sale  
of polluting lawn and garden equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 00:09:33

No Duplicates.

**Comment 413 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Doug  
Last Name: Fischer  
Email Address: dougfischer@cox.net  
Affiliation:

Subject: Leaf blower  
Comment:

Please ban gas powered leaf blowers and support the purchase of electric ones so we can have cleaner air and quieter neighborhoods.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 06:08:39

No Duplicates.

**Comment 414 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kathleen

Last Name: Monteleone

Email Address: kathymonteleone1999@yahoo.com

Affiliation:

Subject: Protect Mother Earth

Comment:

Stop polluting to Mother Earth! Save our precious planet today

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 08:12:42

No Duplicates.

**Comment 415 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gary

Last Name: Hoover

Email Address: garyhoover1@aol.com

Affiliation:

Subject: Small Off-Road Engines Regulations

Comment:

Please make all future Small Off-Road Engines regulated to be zero  
emission engines. Thank you, Gary Hoover

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 09:15:30

No Duplicates.

**Comment 416 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Rachel  
Last Name: Enevoldsen  
Email Address: Rachel.enevoldsen@sbcglobal.net  
Affiliation:

Subject: Leaf blowers  
Comment:

There is no good reason for allowing gas powered leaf blowers. Hearing damage, health damage, pollution, dirty street that just continuously stay dirty from leaf trash. In addition, while not the issue at hand, a vacuum bag would make so much more sense.

Please ban gas powered leaf blowers and help people, the environment, and peace and quiet.

Sincerely,  
Rachel Enevoldsen

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 10:44:46

No Duplicates.

**Comment 417 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kris  
Last Name: Ohlenkamp  
Email Address: kris.ohlenkamp@sbcglobal.net  
Affiliation:

Subject: Small Off-road Engine Regulations  
Comment:

I support and encourage the Board to ban the sale of small off-road gasoline engine equipment by 2024, or as soon as possible. In fact, it is possible now. There currently are reliable and effective electric alternatives for lawn mowers, leaf blowers, chain saws and numerous other equipment that pollute the air, make excessive noise, and that negatively impact the quality of life for us and the very existence of numerous plants and animals.

Please take this bold step to reign in our careless and excessively selfish lifestyle.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 10:40:13

No Duplicates.

**Comment 418 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael

Last Name: Briley

Email Address: bricom3@roadrunner.com

Affiliation:

Subject: New phase-out regulations

Comment:

i support the new phase-out regulations. It's long past time to try  
to save the planet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 10:59:59

No Duplicates.

**Comment 419 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Linda  
Last Name: Harmon  
Email Address: lhart412@roadrunner.com  
Affiliation:

Subject: Banning gas powered lawn and tree care  
Comment:

Hello,  
I am so glad you are considering this step statewide. We have a local ordinance here in Ojai and it has worked really well. There was opposition from the landscape industry at first but now electric powered tools are the norm. It is so much healthier for the workers as well. It is so much more pleasant to walk our streets without the fumes and the noise. Like electric cars I truly believe this is the future.  
Thank you fir your service,  
Linda Harmon

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 11:45:55

No Duplicates.



## **Comment 420 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kristine

Last Name: Henderson

Email Address: kristine@Gardenworks-Inc.com

Affiliation:

Subject: Please delay

Comment:

I urge you to delay implementation of this action to at least 2030.

As the Maintenance Department Manager for a licensed landscape contractor and small business, early (2024) implementation will cause economic hardship and potential loss of business. While these efforts are to be applauded, current replacement of small gas engines with battery power is not reliably viable with current technology and processes within the landscape industry.

Critique of this technology is as follows:

- charge capacity too small to run all day for large projects
- discharge rate anxiety by professional users (draw down time highly variable depending upon use and battery size)
- reduced battery lifespans due to constant or frequent use and constant recharging
- insufficient torque/power (i.e. more power = less run time)
- high price point to purchase
- high price point for replacement batteries
- no to little standardization in battery design
- issues with California's electrical grid including PSPS
- difficulty and or extra costs associated with the need for charging stations or carrying multiple extra batteries during workday
- supply chain issue challenges for foreseeable future
- repair issues - often more economical to throw away than repair

In general, the landscape industry is beginning to use some battery technologies such as portable power tools (drills, saws, chainsaws, small lawn mowers). The challenges listed above will lessen over the next 10 years as the technology improves and price points reduce. A two-year plan is too soon to avoid the issues above. If battery technology was equal to small gas engines in power and price, I can assure you, many landscape contractors would begin to make the switch.

PLEASE consider a delay until 2030.

Sincerely,  
Kristine

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 11:53:01

No Duplicates.

**Comment 421 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Esther

Last Name: Chase

Email Address: channelislands93033@gmail.com

Affiliation:

Subject: Small Off-Road Engine Regulations

Comment:

The sale of gas-powered mowers, leaf blowers, and other small  
polluting gasoline engines should be prohibited beginning in 2024.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 12:35:40

No Duplicates.

**Comment 422 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Leeanna  
Last Name: Schoeder  
Email Address: Leeanna@roxydesigns.com  
Affiliation: CLCA

Subject: Against banning small off-Road engine Regulations  
Comment:

Hello,  
Until there is an affordable and realistic option to this regulation, this will be a tremendous burden to the landscape industry. Although Battery operated equipment is available, it is not feasible to have workers swap out batteries throughout the day since this equipment batteries will not last 8 hours or more. Again, until there are options, this is a waste of time and money to continue this amendment.  
Leeanna Schoeder

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 14:16:13

No Duplicates.

**Comment 423 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Nancy  
Last Name: Alexander  
Email Address: nikki@west.net  
Affiliation:

Subject: Gas powered lawn equipment  
Comment:

Gas powered mowers, edgers and "leaf" blowers should be completely banned. Phasing out sales of new equipment in 2024 will allow the continuation of this extremely LOUD and TOXIC ritual by those who already own these "tools". They fill our homes with toxic fumes, blow dirt and weeds everywhere and make horrendous noise. These deplorable so-called "yard tools" also significantly contribute to greenhouse gases. Roving yard crews should use rakes and brooms instead of polluting every neighborhood with their destructive "tools".

I urge you to ban them completely. Now in 2021.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 14:13:55

No Duplicates.

**Comment 424 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Claude

Last Name: Schoeder

Email Address: claud.schoeder@horizononline.com

Affiliation:

Subject: Gas Powered Garden Equipment.

Comment:

First off would you be willing to pay two to three times more to have your landscape maintained? The cost to a landscape contractor would be enormous. Just the cost of battery equipment alone is two to three time higher than gas powered equipment just for the basic unit, battery and charger. They would still need to buy additional batteries and charger's because one battery wont last more than an 90 minutes. In addition they would need a way to charge the batteries in the field. There are not enough manufacture's out there that off an option to use the car ot truck battery. Which means they would have to use either a Generator (Which I understand is on the list of gas powered equipment to be banned). Or use electricity and the clients location to charge there batteries.

Please also keep in mind that if Landscapers would need to do clean up by using rakes instead of blowers, they would need to possibly double there staffing to get the job done in the same amount of time. This would increase the cost of the contractors operating expense's. Not just in employee slaveries but in Workers Compensation Insurance, additional vehicles and fuel cost.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 14:26:28

No Duplicates.

**Comment 425 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Orest  
Last Name: Balaban  
Email Address: orestb@earthlink.net  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

While I support California's transition to cleaner and quieter lawn care equipment, I believe it is crucial to offer financial aid to the small, private landscaping companies who may find it difficult to re-equip themselves with all new electric equipment. Depending on number of employees, annual profits, etc, the transition should avoid driving "mom and pop" landscapers out of business. Let's improve our communities and support all community members and small businesses.  
Orest Balaban  
Ventura, Ca

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 14:34:20

No Duplicates.

**Comment 426 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Charles  
Last Name: Spraggins  
Email Address: c.spraggins@nppsolutions.org  
Affiliation: NPP

Subject: Blowers  
Comment:

Requiring quieter electric blowers should be considered at this  
time -- and gasoline driven blowers should be discouraged.

Other types of motors should not be regulated at this time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 15:08:29

No Duplicates.



**Comment 427 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elizabeth

Last Name: Burns

Email Address: elizabeth@zone24-landscaping.com

Affiliation:

Subject: Small Off road engine regulation

Comment:

Dear Sirs; this is the worst idea ever. For any small business owners it will put us all out of business. We in the Landscape business servicing large residential properties will not have the ability as it will be cost prohibitive for us to remain in business. Secondly the infrastructure will not be able to handle the additional load in electric usage, as it can not be handled at this time. In Southern California during the summer months we experience numerous BROWN OUTS. How do you expect us to be able to work using only electrical when there is not even enough power to sustain regular needs for homeowners.

Please reconsider this.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 15:09:55

No Duplicates.

**Comment 428 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: mark

Last Name: marcus

Email Address: mark.marcus@centrescapes.com

Affiliation: CentreScapes Inc

Subject: Regulations of Off-Road Engines

Comment:

I am against the banning of small off road engines. I have been a California Licensed Landscape Contractor for 40+ years. Here are my objections;

1. The thousands of small gardeners & tree trimmers will eventually have thousands and thousands of battery equipment. All Lithium charged. And when those pieces of equipment go bad where do you think those defunct Lithium batteries will go?? Answer - straight into our landfills. That is a disaster!!!
2. This will cause work productivity to plummet. Thus landscape maintenance costs will sky rocket. Adding to added cost to Homeowners & HOA's = added inflation.
3. Hugh gas tax loss with no gas being purchased for thousands of equipment pieces. Where will this lost tax revenue for our highway repairs come from???

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 15:16:37

No Duplicates.

**Comment 429 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: lee  
Last Name: juskalian  
Email Address: drbig@me.com  
Affiliation:

Subject: PROHIBIT GAS POWERED LANDSCPING EQUIPMENT  
Comment:

i support new phaseout regulations; you should too

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 15:49:35

No Duplicates.

**Comment 430 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jo Ann

Last Name: Stark

Email Address: gnewf@charter.net

Affiliation:

Subject: Ban gas powered yard tools

Comment:

I support banning gas powered yard tools, not only do they

Add to pollution, dust, weeds and noise pollution, they are also a health hazard for those using, in the case of leaf blowers they gasoline tanks strapped to their and spend all day walking around breathing in fumes. For the safety of those forced to try and earn a living maintaining yards we need to ban the unsafe practice of carrying gasoline on their backs.

Jo Ann Stark

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 15:54:01

No Duplicates.

## **Comment 431 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Richie

Last Name: Johnson

Email Address: Richie@parklandscapemaintenance.com

Affiliation:

Subject: Small engine ban

Comment:

As a small business owner, The ban of sale of small engines would be detrimental to our business. After doing rough calculations it would cost aroximaetely \$75,000 per maintenance truck to convert to all electric. With 5 maintenance trucks currently in operation that equals \$425,000. That doesn't include the cost to upgrade the pg&e service to our property and add additional electrical circuits to our shop to be able to handle the power needed to charge all the equipment. A study shows that there are over 2 million pieces of commercial equipment in the state of California and the proposed 30million in Grant money to replace them only equals 15 dollars per piece of equipment. That doesn't seem like an equal trade. To further speak on electrical california as a state is already maxing out our power grid.. this is the reason for pg&e planed power shut offs.. if all landscapers are charging our equipment that will put even more strain on our grid, what happens if we have a power shut off and can't charge our equipment?? The employees don't work or get paid?? The business can't charge the clients?? Sounds like a detriment to the economy. This ban also follows closely behind the new diesel laws outlawing older diesels weighing over 14 k gvw. We had to get rid of 2 trucks with just over 100k miles on them and replace them with equal viechles costing 65k each totalling 120k. Soon after the diesel laws changed we have the covid 19 pandemic. We lost some assccounts and some have switched to a partial maintenance program reducing our maintenance income. And on top of this we have payed out over 650 hours to pay employees who have either had covid or have been exposed to someone who has. I think the ban of gas equipment will be detrimental to not only our small business but the industry as a whole. We have had to over come a few large hurdles in the past 5 years we don't need another one. I feel if there is proper funding for direct replacement of equipment that will be the only way company's will be able to survive. I also find it interesting that the automobile wis given over 15 years to do research and developoment to eliminate the sale of gas viechles by 2035 but the landscape industry is only given 2 years? I strongly advise administration to think about the consequences before passing this law.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 15:59:13

No Duplicates.

**Comment 432 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Simone  
Last Name: Schad-Siebert  
Email Address: simone\_a\_s@hotmail.com  
Affiliation:

Subject: gas leaf blowers  
Comment:

Please require all landscaping businesses to switch to electric leaf blowers or brooms and rakes. The pollution from gasoline leaf blowers and lawn mowers is awful. Additionally the noise pollution is disturbing and goes on all day long every day. Our air quality in Southern California is horrible and a danger to everybody's health from kids to the elderly.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 18:34:30

No Duplicates.

**Comment 433 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Robert

Last Name: Nast

Email Address: Nofrack@hotmail.com

Affiliation:

Subject: No More Gas Motor Mowers and Blowers-Pls

Comment:

Nono no blow and go with fossil fuel-please!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 22:01:42

No Duplicates.



**Comment 434 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Heidi  
Last Name: Sanborn  
Email Address: heidi@heidisanborn.com  
Affiliation:

Subject: Support of SORE  
Comment:

For all the reasons mentioned, from the need to electrify and end the burning of fossil fuels, to air quality and noise pollution, I urge you to ban the sale of gas-powered SORE equipment by 2024. It is a reasonable timeline given the market availability, improved performance, and reduced costs of the electric equipment. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 07:32:49

No Duplicates.

## **Comment 435 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Isabelle  
Last Name: Teraoka  
Email Address: iterraoka@gmail.com  
Affiliation: Santa Fe High School

Subject: electric-powered lawn equipment better for gardeners and schools  
Comment:

Dear Chair Randolph and Members of the Board,

Thank you for all you do. It must not be easy to oversee matters of air quality and have to balance competing interests. I hope the decision to phase out gas-powered lawn equipment is a relatively easy one to make: less air and noise pollution = healthier people.

As a teacher in a California public school, I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024. It makes sense both on a very personal level and for the health and well-being of everyone.

When the gardeners use their lawn-equipment during class, it's hard for me to project my voice over the din. It makes it harder for the kids to concentrate. On weekends, when I am looking forward to a well-deserved nap, the gardeners next door power up their machinery and rob me of the rest I need. Most importantly, by phasing out gas-powered equipment, you will be giving my students hope, tangible proof that the state is doing all it can to address the looming climate emergency. Indeed, I was stunned and dismayed when a student told me the other day I was the only person he knew who was taking any steps to address climate change!

Beyond how this issue impacts me and my students directly, the use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians breathe unhealthy air everyday. That also means more cases of asthma and missed school days.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives, and give some needed relief to educators who are already working so hard.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you,

Isabelle Teraoka

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 07:18:24

No Duplicates.

**Comment 436 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steven  
Last Name: Wolfson  
Email Address: Sawolfson@aol.com  
Affiliation:

Subject: Leaf blowers  
Comment:

Ban the sale of gas powered leaf blowers, edgers and lawn mowers.  
Phase out existing over 3years

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 07:42:52

No Duplicates.

**Comment 437 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Victor

Last Name: Kamendrowsky

Email Address: vkamendrowsky@gmail.com

Affiliation:

Subject: leaf blowers

Comment:

Leaf blowers are an abomination! These polluters are easily replaceable by honest, clean, human labor.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 08:40:03

No Duplicates.

**Comment 438 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Chris  
Last Name: Nelson  
Email Address: chris4pax@gmail.com  
Affiliation:

Subject: leaf blowers  
Comment:

2 stroke engines need to be banned as part of our immediate response to stopping climate catastrophe. This also helps against noise pollution and by default to put more people to work for longer periods as leaf blowers are the lazy man's way to rake.  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 08:55:56

No Duplicates.

**Comment 439 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Vicki  
Last Name: Tomola  
Email Address: Vltomola@hotmail.com  
Affiliation:

Subject: Zero emission small engines  
Comment:

Everyone, all the consumers, must also be part of purchasing products that have Zero emissions for our health, for life on this planet & to be a solution of the climate crisis. It is your obligation to all life to only sell zero emission small engines.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 10:04:44

No Duplicates.

**Comment 440 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Anna  
Last Name: Janakiraman  
Email Address: ajnkrmn@gmail.com  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Anna Janakiraman

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 10:26:32



No Duplicates.

**Comment 441 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Grace

Last Name: Marvin

Email Address: g-marvin@comcast.net

Affiliation: SierraClub&ButteEnvironmentalCouncil

Subject: Small Off-Road Engine Regulation

Comment:

It is vitally important that you pass the proposed Small Off-Road Engine Regulation, We need to end the sale of polluting lawn and garden equipment as still another step to address Climate Change!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 10:47:52

No Duplicates.

**Comment 442 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Linda

Last Name: Hillman

Email Address: lghillman@earthlink.net

Affiliation:

Subject: Support for California's Transition to Clean Lawn Care Equipment

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/782-sore2021-BXZXJABxUXIAaVMh.pdf'

Original File Name: Support for California Transition to Clean Lawn Care Equipment.pdf

Date and Time Comment Was Submitted: 2021-11-20 13:09:55

No Duplicates.

**Comment 443 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: helen

Last Name: conly

Email Address: conlyhelen@gmail.com

Affiliation: Board of Directors, www.cfrog.org

Subject: Use of gas powered leaf blowers

Comment:

Living in the Ojai Valley, we have seen the benefits of electric leaf blowers big time.

Many folks were dubious, but the data showed promising results, and the city workers liked the new equipment.

Note that leaf blowers impact Latinos the most since they often provide this service to cities. helen conly

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 15:43:13

No Duplicates.

**Comment 444 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Janice  
Last Name: Pardoe  
Email Address: jrp44074@gmail.com  
Affiliation:

Subject: please ban gas-powered landscaping equipment  
Comment:

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

These types of small engines produce a lot of greenhouse gasses. Better alternatives are available, and developments in both this field and others show that recommendations and gradual phase-outs are not effective. We need to ban the sale of this equipment immediately; it's too late to dilly-dally about climate change.

Financial subsidies provided by the state will help any small businesses that are hurt by rule changes. There are no more excuses.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 16:30:18

No Duplicates.

**Comment 445 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Hildy  
Last Name: Meyers  
Email Address: hmeybsan@verizon.net  
Affiliation:

Subject: Support for California's transition to clean lawn care equipment  
Comment:

I urge you to pass the proposed Small Off-Road Engine Regulation to end the sale of polluting lawn and garden equipment. These types of engines are responsible for a disproportionate amount of air pollution. They also create unnecessary and disruptive noise pollution. We must have zero-emission SOREs for our health. We cannot afford the climate or health costs of these engines.

Please approve and amend the SORE regulations per the staff recommendation.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 17:23:38

No Duplicates.

**Comment 446 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Elizabeth A  
Last Name: DeJarnatt  
Email Address: coastrn@gmail.com  
Affiliation: Sierra Club member

Subject: Support 4 CA's transition to clean lawn care equipment  
Comment:

Dear Chair Randolph and Members of the Board,

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air everyday.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

\$8.8 billion in health insurance benefits through 2043

892 premature deaths avoided

438 fewer emergency room visits for asthma

311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and manual equipment. This is in addition to subsidies and buy back programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives.

Please approve and amend the SORE regulations per the staff recommendation.

Thanks,  
Elizabeth DeJarnatt

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 18:35:46

No Duplicates.



**Comment 447 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sylvia

Last Name: De Baca

Email Address: sylviaadeba@verizon.net

Affiliation:

Subject: Support for California's Transition to Clean Lawn Equipment

Comment:

The use of gas-leaf blowers and lawnmowers in particular causes numerous health problems and greatly contributes to California's notorious poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californian's like me breathe unhealthy air everyday.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 20:20:26

No Duplicates.

**Comment 448 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jamaica  
Last Name: Chenoweth  
Email Address: elephant3352@outlook.com  
Affiliation:

Subject: Leaf blowers  
Comment:

Are annoying & can be electric.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 20:53:56

No Duplicates.

**Comment 449 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ann

Last Name: Schneider

Email Address: AnnSchneider2020@outlook.com

Affiliation: City of Millbrae

Subject: Immediately stop sale of gas powered SORE equipment

Comment:

You have the chance to move quickly to provide exchange programs to remove existing gas powered gardening equipment and replace them with electric version of leaf vacuums, blowers (that still create dust for those of us with asthma) lawn mowers, etc. And for those of us living in noise impacted areas like Millbrae that gets blasted by BART, Caltrain, Caltrans, and SFO electronic equipment is quieter. Please move quickly. You are our lead agency on climate change while you ignore SFO air pollution you can at least do this for the people of Millbrae. Ann Schneider, Mayor, City of Millbrae

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-20 22:32:53

No Duplicates.

**Comment 450 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Miguel  
Last Name: Aspeitia  
Email Address: Miguel@GSL1.net  
Affiliation: Global Sun Landscape

Subject: No gas power equipment  
Comment:

electrical equipment for the landscape is fine for homeowner but for commercial landscape side their is a great expense incurred for products that don't do as well as gas powered equipment . People banning gas power equipment have probably never been on a commercial landscape maintenance rout. Battery powered equipment have high cost to purchase and when battery is no longer useful replacment is almost as much of a cost as the original purchase. Battery equipment for large landscape maintenance is not yet economically smart at this point due to reduced power and cost compared to gas power equipment .

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 06:12:43

No Duplicates.

## **Comment 451 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jesica  
Last Name: Goldhammer-Zebouah  
Email Address: jesica@downtoearthland.com  
Affiliation:

Subject: Banning gas-powered mowers  
Comment:

Hi-

I just wanted to weigh in here. I've owned and operated Down to Earth Landscaping for 24 years now in the East Bay and I am a strong advocate for the environment and the health of our workers. While I agreed with the ban on gas leaf blowers because of its direct impact on workers health and the environment, most landscapers have not stopped using them. On any given day in an area that hires gardeners, I'll see most if not all gardeners are still using the banned equipment with no enforcement. We made the switch and it has been a challenge. The equipment requires constant maintenance because they're not made for commercial use (though their price tag is high as if they are), there are limited vendors who repair them and they require constant charging, limiting where and when they can be used.

I don't agree with a ban on gas mowers. While we have been reducing the amount of lawns we install, the ones that are out there growing still require cutting and battery and electric options aren't for commercial use. This will result in constant cost and headache for the companies who are following the rules while most gardeners who are not operating legally will continue to do things their way and the homeowners who hire them will continue to support them. Without enforcement, these bans are useless and enforcement would only create a further rift between those of us following the law and the vast majority who are being hired as gardeners who don't and won't.

Thanks for reading,  
Jesica

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 06:19:06

No Duplicates.

**Comment 452 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joan  
Last Name: Smith  
Email Address: joanesq93@gmail.com  
Affiliation:

Subject: No gas leaf blowers  
Comment:

Help save the environment, insure fresh air, prevent noise pollution. Gas leaf blowers may be a convenience, but they are hard on communities and the environment. There are better alternatives. Gas leaf blowers must be banned.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 09:07:38

No Duplicates.

**Comment 453 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jessica

Last Name: Krakow

Email Address: konradj@somic.net

Affiliation:

Subject: zero emissions from garden equipment

Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 10:45:08

No Duplicates.

**Comment 454 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mary  
Last Name: Krause  
Email Address: thekrausefamily@yahoo.com  
Affiliation:

Subject: Regulation to phase out gas-powered leaf blowers and other small equipment  
Comment:

Dear California Air Resources Board:  
I am writing to urge you to implement the phase-out of gas powered leaf blowers and other small gas powered vehicles and equipment. We know that pollution from gas is harmful to our health and to the health of our planet. Please, please for the sake of Californians and for the health of our planet do all that you can to eliminate the sources of that pollution.

Sincerely,  
Mary A. Krause  
1023 Via Ondulando  
Ventura, CA 93003  
Tel: (805)644-9920

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 11:02:25

No Duplicates.



**Comment 455 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Katharine  
Last Name: Simmons  
Email Address: kay56094@gmail.com  
Affiliation:

Subject: Updating California's air quality regulations  
Comment:

I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024. This is a modest but important step to advance greater use of cleaner, healthier and quieter equipment. Use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems in our State. Let us transition to new, zero emission electric and manual equipment!!! Please vote to APPROVE AND AMEND the SORE regulations per the staff recommendations  
Thank you for your time and consideration to these ideas

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-21 11:35:21

No Duplicates.

**Comment 456 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Francisco  
Last Name: Salazar  
Email Address: francisco@groundcareco.com  
Affiliation:

Subject: Small Gas Power Equipment  
Comment:

It is my opinion that small gas powered equipment should not be banned.

I am a partner of a small landscaping business with 7 employees. At the moment we focus on mostly landscape maintenance and we rely heavily on gas powered equipment like leaf blowers, weed eaters and hedge trimmer. Although we have started to try out the newer electric counter parts the tools are just not as reliable as gas powered. I feel the market is just not there yet to convert to full electric. This is not to mention that full electric tools are more expensive and have required more expensive repairs faster than gas powered equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 06:48:03

No Duplicates.

**Comment 457 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bill

Last Name: Hickman

Email Address: bill.hickman.ventura@gmail.com

Affiliation:

Subject: SUPPORT electric mowers and other small engines

Comment:

I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

While these regulations do not prohibit the use of polluting equipment, they do propose restricting the production of new equipment to sell or lease for use in the State of California beginning in 2024. This is a modest but important step to advance greater use of cleaner, healthier and quieter equipment.

As your agency's own research has found, the use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, greatly contributing to California's sad role as home to seven of the Top Ten most polluted cities in the nation. In fact, California risks losing future federal funding if we continue to fail to meet national air quality standards.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 07:48:46

No Duplicates.

**Comment 458 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John  
Last Name: Tornabene  
Email Address: Clncounty@aol.com  
Affiliation: www.pwna.org

Subject: Score2021  
Comment:

Banning the sale of small gas engines up to 25hp in California 2024 for homeowners use is one thing but to do it to business owners who rely on small gas engines to forge out a living & to expect them to replace those engines with electric equipment is irresponsible & wrong to do that so soon. The reason for this is the technology is not there yet to make this practical & feasible. If by enacting this law in 2024 the outcome will eventually be catastrophic for many companies to stay in business. Until the technology is sound enough this law should be abolished until that can be proven.  
Sincerely,  
John M. Tornabene

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 07:34:18

No Duplicates.

**Comment 459 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jeff  
Last Name: Jensen  
Email Address: jjensen@gcsaa.org  
Affiliation: California Alliance for Golf

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

Comment:

Dear California Air Resources Control Board,

On behalf of the California Alliance for Golf, please find attached our comments on the proposed amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions.

We appreciate the time and consideration of the board and the staff during this process and their willingness to work with industry to provide a solution that can work for all parties involved.

If you have any questions, please don't hesitate to call or email me below.

Sincerely,

Jeff Jensen  
Southwest Field Representative  
Golf Course Superintendents Association of America  
785-840-7879  
jjensen@gcsaa.org

Attachment: 'www.arb.ca.gov/lists/com-attach/805-sore2021-UTJWMQZrAjhSMlc4.pdf'

Original File Name: California Alliance for Golf (CARB) 11.22.21.pdf

Date and Time Comment Was Submitted: 2021-11-22 07:58:45

No Duplicates.

**Comment 460 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Steve  
Last Name: Smith  
Email Address: steve@stevensmithlandscape.com  
Affiliation:

Subject: Small engine ban  
Comment:

Please reconsider the small engine ban scheduled for 2024. In a state that is already very difficult to operate a small business due to high taxes and other regulations this could be the final nail in the coffins for many small businesses that depend on these types of power equipment. The cost to convert to battery to accomplish the tasks that the small engines perform is staggering. The current technology only allows us to operate these electric powered tools for approximately 30 minutes. I'll need 16 battery packs per each power tool we use in order to work a shift.

Please stop the ban.  
Steve Smith

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 09:11:37

No Duplicates.

**Comment 461 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Taylor  
Last Name: Procyk  
Email Address: taylor.procyk@aethercatalyst.com  
Affiliation: Aether Catalyst Solutions, Inc.

Subject: Comments for SORE21  
Comment:

Please see attached letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/808-sore2021-WjkCawBsVmgKaVU7.pdf'

Original File Name: Comments for SORE2021.pdf

Date and Time Comment Was Submitted: 2021-11-22 09:58:17

No Duplicates.

**Comment 462 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Greg  
Last Name: Wrenn  
Email Address: office@pastthegate.com  
Affiliation: Past the Gate/CLCA

Subject: Small Off-Road Engine Regulations  
Comment:

We are very opposed to the Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions. This is not cost effective for commercial landscape care and will cost companies accounts and ability to continue to do business. The commercial electric/battery powered options are not effective, they take twice as much time to operate and the batteries do not last long enough to complete more than 1 job. Please do not pass this amendment.

In the cities where it is required we are following requirements and are having to increase cost of service as well as buy new batteries (which are terrible for the environment) constantly.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 10:24:32

No Duplicates.



## **Comment 463 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joshua

Last Name: Drake

Email Address: jdrake@mtadistributors.com

Affiliation: MTA Distributors

Subject: Zero Emissions on SORE

Comment:

MTA Distributors, LLC is a distributor of small lawn & garden equipment. The company serves a network of both manufacturers of small equipment and small retail businesses in California, such as hardware and lawn and garden stores. We supply these small businesses with Honda engines and dozens of different pieces of equipment powered by internal combustion engines.

While the proposed mandate of no internal combustion engines would negatively impact the lives of our 60 employees, we do not make this appeal primarily on our own company's behalf. Instead, we make it on behalf of the thousands of employees of our customers' businesses that we serve. Many of these Californians would be instantly unemployed by this legislature. Last year, we served 631 businesses in California, each employing anywhere from 2 to 40 people. At a conservative estimate, this would represent 2,500 Californians that we currently serve who would be unemployed by this policy. This is not even to consider the many employees served by our competitors. Moreover, this legislation will create new financial burdens for all Californian homeowners, and it would be most painful for the lower income households. A battery powered zero-turn mower costs 33% more than its gas-powered equivalent. This extra cost will be passed down from the landscaping companies that service low-income apartments straight through to the tenants.

Of course, we share your concern for protecting our environment. We all desire to care for the earth and work hard to build a sustainable future. In fact, MTA has even created an entirely new staff position for developing green energy. However, this legislation will not achieve the intended outcome of reducing ecological damage. In fact, the net effect of this dramatic legislation is actually worse for our environment. Any deeper look into the realities of increasing battery adoption will reveal that the energy equivalent of 100 barrels of oil is used to make a battery that can store the equivalent of one barrel of oil (M. Mills), meaning a move away from combustion engines could cause a 100-fold increase in energy consumption. Furthermore, it is demonstrated that "green" equipment requires ten times more material than fossil-fuel equivalents, and 500,000 pounds of ore must be mined in order to produce 1 battery for an electric car (M. Mills).

Please do not attempt a future and putative gain in human welfare at the expense of an immediate and certain loss of it. We feel strongly that a more thoughtful and more measured approaches to

alternative energy will better serve both humanity and our precious environment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 13:15:12

No Duplicates.

**Comment 464 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Tom  
Last Name: Sweeney  
Email Address: tom@landscapecare.net  
Affiliation:

Subject: AB 1346  
Comment:

I ask that CARB please help commercial landscape contractors with the implementation of going electric. This is a much needed change and for many good reasons.  
However, there are a few problems with the the time line of said bill.  
Having spoken directly with our distributors and manufacturers, there are few if any options available for electric/battery operated commercial equipment. Due to the lack of commercial equipment how would the Landscape industry implement a change over in such a short period of time?  
I think a more reasonable transitional time period would be a good start.  
The auto industry, for instance has many options available, however they do not have to comply until 2035.  
I would suggest a phased in approach starting in the year 2028 which would also allow the technology to catch up with the needs of the commercial landscape contractor.  
Then a complete target date of 2030 to change to electric.  
In addition, incentives and tax credits should be made available since this would require a substantial investment by the entire industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 15:30:09

No Duplicates.

**Comment 465 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: RYAN  
Last Name: FULLERTON  
Email Address: rmfullerton@gmail.com  
Affiliation:

Subject: Discontinued Sale of small gasoline engines  
Comment:

If this proposed legislation were adopted it would cause a tremendous financial hardship for landscape maintenance (gardening) professionals as well as construction professionals. Retooling and adjusting facilities to new charging requirements would put undue burden on business owners.

In addition to the financial implications, the legislation is discriminatory toward minorities (particularly hispanic). A large portion of the landscape and gardening industry is comprised of hispanic owners and workers and it is my position that this new legislation unfairly targets these minorities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 06:56:25

No Duplicates.

## **Comment 466 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Eric  
Last Name: Carleson  
Email Address: ecarleson@calog.com  
Affiliation: Associated California Loggers

Subject: Proposed Amendments to SORE: Seeking Exemptions for Wildfire/Logging  
Equipment

Comment:

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

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

To the California Air Resources Board:

Associated California Loggers is the trade association representing logging companies, log trucking companies, and log road building companies in California. Our members are at the forefront of fuels reduction, thinning, and biomass collection at a time when California has faced its two worst wildfire seasons in history.

This particular period of crisis in California history - with its terrible mix of loss of human life, wildfire carbon emissions, loss of animal life and species habitat, and the destruction of hundreds of homes and millions of acres of timberland - strikes as exactly the wrong time to be targeting chainsaws, water pumps and other "tools of the trade of wildfire prevention and suppression." Against the emissions produced by wildfire, the emissions reductions contemplated here strike as a comparatively small.

Moreover, we believe that the rule as proposed simply isn't workable, and that exemptions for specific pieces of equipment must be exempted from the Proposed Rule. Those specific pieces of equipment include large chainsaws, water pumps required during the conduct of forest management activities for the purpose of wildfire preparedness, portable pumps relied upon for drafting water to fill water trucks, off-road forestry equipment with water tank and pump for wildfire preparedness, and portable air compressors to service forestry equipment.

Associated California Loggers believes that our comments should be considered with an eye towards worker safety and wildfire preparedness. We have been working with the Governor's office on "workforce development" of a young and diverse workforce and we believe that it would be counterproductive for this important work to be rendered impossible to perform due to unrealistic "electric" engine requirements for wildfire work in the woods.

Thank you,

Eric Carleson  
Executive Director  
Associated California Loggers

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 16:34:52

No Duplicates.

**Comment 467 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Lisa

Last Name: Moreno

Email Address: shawspirit@cox.net

Affiliation:

Subject: zero emissions

Comment:

Please let's do everything possible to reduce our carbon footprint.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 17:50:38

No Duplicates.

**Comment 468 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: diana  
Last Name: koeck  
Email Address: dianakoeck@gmail.com  
Affiliation:

Subject: Small off-road engine regulation  
Comment:

Please pass the proposed small off-road engine regulation that would end the sales of polluting lawn and garden equipment. Not only do leaf blowers cause air pollution but they also cause noise pollution!

WE need to do all we can to save our EARTH.

Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-22 22:41:36

No Duplicates.



**Comment 469 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Laura  
Last Name: Jacobson  
Email Address: xtreemlite@yahoo.com  
Affiliation: Salutation\*

Subject: Zero emissions for leaf blowers  
Comment:

It's time to do something about leaf blower emissions. Please take  
action. The damage they cause is widespread.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 01:26:36

No Duplicates.

**Comment 470 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Nina

Last Name: Danza

Email Address: prettycheapjewelry@gmail.com

Affiliation: - None -

Subject: In Support of NO MORE GASOLINE Leaf Blowers

Comment:

I am in full support of ending gasoline powered small engines especially leaf blowers and landscape equipment. Firstly, the emissions produced by those engines contribute to climate change and need to be put at a stop immediately. Every reduction of CO2 is important toward climate change solution, including by individuals, businesses and government.

Secondly, zero emissions alternatives already exist for landscape maintenance regardless of size. I suggest all landscape maintenance be performed with electric motors. Electric equipment can be employed for residential, commercial and even large municipal or park size work. For example, electric mowers (even ride on style) are better than gasoline mowers for park settings.

In addition, I would like motorized leaf blowers completely banned in the future for certain areas, such as residential and commercial, to stop the increase of airborne particulates. The use of leaf blowers causes pollutants, including road metals and urban bacteria, to become airborne, resulting in health and ecosystem impacts.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 06:01:29

No Duplicates.

**Comment 471 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kathy

Last Name: Les

Email Address: kathy.les321@gmail.com

Affiliation:

Subject: Support CARB Rule to Ban Sale of Gas SORE

Comment:

The facts in favor of the betterment of the health and welfare of those who use gas lawn equipment, those who live in the shadow of its use, and the earth generally point to the importance of ending the sale of gas lawn equipment ASAP. Please, please, let's turn to clean equipment paired with ample education and \$\$ new equipment. Taking this step forward was never more important.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 06:48:59

No Duplicates.

**Comment 472 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Daniel  
Last Name: Spillmann  
Email Address: Spillmann.daniel@scrippshealth.org  
Affiliation: Scripps Health

Subject: Ban for gas powered equipment  
Comment:

The ban for gas powered machines would impact our operation a lot. Electric equipment is very loud too and it will take a lot longer to get a job done. We would have more complains from patients and visitors. The short last of charge means we have to buy a lot of very expensive batteries who run out quickly. More time to get a job done means to we need more people doing the same job in a certain amount of hours. The disposal of batteries is not resolved ether. No on the ban for batterie powered equipment!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 07:53:44

No Duplicates.

**Comment 473 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jen  
Last Name: Terhune  
Email Address: jen\_terhune@yahoo.com  
Affiliation:

Subject: statemtn of opposition to bil: sore2021  
Comment:

If you are going to implement such a radical shift in the course of how businesses and homeowners use such vital things like lawn mowers, chainsaws, generators just to name a few, you must give years for the development of comparable technologies and efficiencies. I am all for lessening the pollution impact on our planet, but you seem to be bent on doing it in a manner most destructive to all of us. Please reassess your approach, and make reasonable plans for a switch to how emissions from these engines are produced and or lessened.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 08:06:48

No Duplicates.

**Comment 474 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Brandon  
Last Name: Whitney  
Email Address: brandon@psiproducts.com  
Affiliation: Pressure Washer Dealer

Subject: Response to California AB-1346  
Comment:

PSI is a small local business that has been an authorized dealer of industrial cleaning equipment for about 40 years. We specialize in selling and repairing pressure washers and steam cleaners, 2 pieces of equipment that are targeted for removal from the market by AB1346.

This bill would without a doubt quickly put our company, as well as most of our customers, out of business. While we understand the idea behind the bill is valid and will lead to a reduction in pollution, it will also lead to the destruction of the cleaning industry as we know it. Schools, hospitals, food processing facilities, municipalities, sports facilities and more: all rely on the power of pressure washers and steam cleaners to clean effectively and thoroughly.

Currently there is no technology available to transition to battery-operated or electrical hot water pressure washers or steam cleaners. The batteries required to run our equipment do not exist, and the demand on the existing electrical grid to run our machinery would be overwhelming.

Also, the lithium batteries that would be required due to this bill would present an enormous expense to all of the industries currently using pressure washers and steam cleaners, and could present an additional problem for the environment. Disposing of these batteries could prove to be a bigger problem for the environment than our equipment does.

Please delay the implementation of this bill for industrial users of this equipment. The unintended consequences of this bill will be detrimental to not only the sellers of the equipment, but also the users. Landscapers, car detailers, building maintenance personnel, large venues personnel and many more will need to spend a great deal of money to comply or close their business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 08:27:55

No Duplicates.

**Comment 475 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Paul  
Last Name: Rozenberg  
Email Address: prozenberg@suburbanpropane.com  
Affiliation: Suburban Propane

Subject: Suburban Propane - SORE Regulation Amendment Comments  
Comment:

On behalf of Mike Stivala, Suburban Propane President and CEO,  
please see the attached letter.

Thanks,  
Paul Rozenberg

Attachment: 'www.arb.ca.gov/lists/com-attach/844-sore2021-BXZQI1Q3UXcGcglr.pdf'

Original File Name: Suburban Propane - Comments on Proposed SORE Regulation  
Amendments.pdf

Date and Time Comment Was Submitted: 2021-11-23 10:53:46

No Duplicates.



**Comment 476 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Carol  
Last Name: Miller  
Email Address: carol.miller06@yahoo.com  
Affiliation:

Subject: sore2021  
Comment:

This legislation, to ban gas powered small engines, is entirely misguided and will cause great economic turmoil to many small businesses and homeowners. Replacements for these tools are not well developed, they are expensive, and dependent on batteries that expire rapidly. Where is the power to come from to charge all these batteries? Our grid is already overwhelmed at peak hours. This legislation is premature and completely irresponsible.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 11:05:49

No Duplicates.

**Comment 477 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ernesto

Last Name: Macias

Email Address: emacias@wcainc.com

Affiliation: VP Risk Management, West Coast Arborists

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Small Off-Road  
Engine Regu

Comment:

The banning of such equipment for large commercial operations, including municipality and utility tree trimming, would harshly affect the public's safety. Tree trimming is needed on large scales for municipalities to ensure safe travel for emergency vehicles and keep the public safe from falling trees and limbs. Tree trimming is also needed year-round to clear high voltage powerlines. Not clearing these lines will reduce the reliability of safe electricity to the public. It also poses electrical hazards that can cause injury or death. To limit the use to only battery-operated chainsaws to do this needed and regulated work is irrespirable by ARB. The industry does not have the necessary battery-operated chainsaws to do this work. The technology needed for large-scale tree operations does not exist. There will be an unburdened expense to contractors who will be passed to the taxpayers. A carve-out for these contractors must be given to continue operations of gas-powered equipment. ARB can achieve its goal by limiting homeowners of gas-powered equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 14:17:18

No Duplicates.

**Comment 478 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Marie  
Last Name: Vasilieff  
Email Address: marie@westerngardens.net  
Affiliation:

Subject: Small Off Road Engine Regulations: Transitional to Zero Emissions  
Comment:

Dear Air Resources Board:

Dear Air Resources Board,

This is going to be a very hardship for our small business. The reason is the technology is not ready to accommodate the way we operate. We have no outlet available to power and recharge the batteries as we are operating outside only and in remote areas where there is no outlet. It would not be very cost effective at all. We would need to buy a lot of batteries which is very costly. We perform a lot of public works performing revegetation in remote areas and we need a generator to power our shovel to dig and trench. We need to do weed abatement and use our weedeater for hours. We would not have enough batteries to finish the job in a day or use our chainsaws. Our lawn mowers would not even last all day when we have to mow turf areas that have been repaired and reseeded for the school districts.

Thank you for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 15:59:58

No Duplicates.

**Comment 479 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Adan

Last Name: Gonzalez

Email Address: gonzalezadan19@gmail.com

Affiliation:

Subject: CARB Regulations

Comment:

I am not completely opposed to this idea, but I disagree with it. The equipment for a lot of the tasks aren't well equipped, for example: Stump removal, or most Tree services in general, it isn't quite ready yet. They lack power and reliability on a variety of equipment and not to mention there is still not any options that I am aware of for a variety of chainsaws and pole saws. I also know that in many isolated situations where there is no access to alternative energy, gas is the only real reliable source to power this kind of equipment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-23 15:55:24

No Duplicates.

**Comment 480 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Misha  
Last Name: Askren  
Email Address: misha.askren@gmail.com  
Affiliation: Sierra Club

Subject: Small Off-Road Engines  
Comment:

I want to encourage CARB to pass the regulation requiring that leaf blowers, lawn mowers, weed whackers and the like all be electric powered engines. Gasoline-powered engines emit vile pollution from fumes. They also are another source of gases that contribute to climate change. Finally they are tremendously noisy, causing another type of pollution that impacts our neighborhoods. The pollution from them causes more respiratory conditions, the chemicals in the exhaust could be carcinogenic and they only continue our dependence on fossil fuels. Now is the time to pass the regulation that all of these engines need to be electric. They are quieter, do not spew exhaust and allow us to decrease our use of fossil fuels.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 06:49:16

No Duplicates.

## **Comment 481 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alex  
Last Name: Salazar  
Email Address: alex@groundcareco.com  
Affiliation: Business Owner

Subject: Small Off Road Engines for Commercial Use  
Comment:

To CARB:

I am a third generation gardener. I, along with my brothers and my father, own a landscape maintenance contracting company in the Los Angeles area. To build our commercial gardening business has been both the most incredibly challenging and most rewarding professional endeavor.

I believe this new proposed regulation, while crafted with great intentions, parts of it are greatly mistaken and have the potential to bring incredible harm to small and what I imagine are predominately minority business owned enterprises.

We have experience using battery powered equipment. We purchased the commercial grade battery set available from STIHL. We also use 4 of their blowers combined with the AR 3000 backpack battery. This is the most powerful battery option available in the market today. In our experience this battery set up has a real run time of about 2 hours. This forces us to purchase more batteries if we want to perform the full day.

While a STIHL BR 500 (gas powered) blower costs about \$500, the commercial battery option costs about \$1500 plus another \$1000 for an extra battery pack. The battery option for the commercial gardener costs \$2500 minimum when the goal is full day performance. This price tag of 5x is an incredible burden. Not to mention the increased repair costs and decreased longevity of this option. I would encourage you to talk to lawn mower repair shops that are familiar with this such as Garvey Equipment in San Gabriel.

Another factor is increased labor due to more limited portability. If a job takes slightly longer due to battery run time concerns or we have to be swapping batteries this increases labor. Labor is another extreme challenge we face. There are no prospects of labor becoming more available or less expensive.

To finalize, I would plead to the CARB board to consider making some sort of exception for commercial enterprises. The use for us is not the same as it is for a homeowner.

This regulation for us is like handing us a weighted backpack while we attempt to hike. a steep hill.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 06:25:59

No Duplicates.

**Comment 482 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Leo  
Last Name: Avila  
Email Address: l.avila@lscapopro.com  
Affiliation: LandscapePro

Subject: Hardship  
Comment:

I am writing to you today as a concerned constituent in opposition to CARB's proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 07:52:17

No Duplicates.



**Comment 483 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jimmy  
Last Name: Welch  
Email Address: info@ceta.org  
Affiliation: Cleaning Equipment Trade Association

Subject: Please Preempt Pressure Washers  
Comment:

Pressure Washers have proven to be essential in California with epidemics such as Hepatitis A by allowing cleaning in remote areas preventing the spread. Therefore, improving the quality of life for all Californians.

SORE Pressure Washers allow exterior cleaning where the proper electricity is not readily available.

Battery powered Commercial Pressure Washers are not currently available in the market place. Therefore, we ask Pressure Washers be preempt until battery power Pressure Washers are readily available, proven and cost feasible. This will allow California to remain Clean and Safe for residents and tourists. See attached for more detailed information. Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/856-sore2021-AGNVNIYjBzVVDFMw.pdf'

Original File Name: CETA CARB SORE Reply 11-24-2021.pdf

Date and Time Comment Was Submitted: 2021-11-24 07:49:28

No Duplicates.

**Comment 484 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Cole

Last Name: Turner

Email Address: cmfturner@sonic.net

Affiliation:

Subject: ZERO EMISSION LEAF BLOWERS AND OFF-ROADS

Comment:

Air quality, human health, the environment are all threatened by these horrible practices. Shut it down!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 10:01:24

No Duplicates.

## **Comment 485 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jay  
Last Name: Brakensiek  
Email Address: jbrakensiek@outlook.com  
Affiliation:

Subject: Opposition to Proposed Rule  
Comment:

I am writing in opposition to the proposed rule. I have over 30 years experience in the field of safety/emergency preparedness. The proposed rule is infeasible especially in the area of gasoline and diesel emergency generators which are critical during the frequent power outages California experiences. This will impact me both at home where I depend on an emergency generator for personal medical equipment during power outages and professionally as organizations depend on emergency generators for critical power needs during outages. All emergency generators should be exempt from this proposed regulation, period.

Other off road engine regulations proposed will force many small gardening services out of business due to the high cost of purchasing new electric equipment and multiple power packs. Costs for these services will increase.

Many organizations, farmers, and ranchers use off road gasoline vehicles routinely, this regulation will eliminate that valuable use forcing massive repurchasing and economic harm.

In addition, the elimination of multiple non-electric motors will cause further stress on an already overburdened California electric grid. With all the new electric cars in place, demand can't keep pace already.

This regulation needs to be scrapped due to its impracticality and high long-term economic burden.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 09:59:00

No Duplicates.

**Comment 486 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John  
Last Name: Harris  
Email Address: jlharris@sonic.net  
Affiliation:

Subject: sore2021  
Comment:

I have a small business that use 18HP generators to operate Cutting & drilling Equipment on remote or Unpowered job sites i have not seen any ways in the public sector that will accomplish the power needed to operate these types of tools unless we start towing large generators which are very expensive and cause more pollutants not to mention the problems with getting them to locations where work is required any answers would be greatly appreciated as i try to stay informed on these issues and spread that information to other contractors in our area - thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 10:16:18

No Duplicates.

**Comment 487 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Laurel  
Last Name: Moorhead  
Email Address: lmoorhead@transferflow.com  
Affiliation: Transfer Flow, Inc.

Subject: Transfer Flow, Inc's Comments on Potential Amendments to Small Off-Road Engine Regulations

Comment:

Dear Mr. Burford and Ms. Fibiger:

Please find attached Transfer Flow, Inc.'s public comment regarding the California Air Resources Board's potential amendments to small off-road engine (SORE) regulations.

Best regards,

Laurel Moorhead, E.I.T.  
Regulatory Compliance Engineer  
lmoorhead@transferflow.com  
(530) 893-5209 ext. 315

Attachment: 'www.arb.ca.gov/lists/com-attach/862-sore2021-AnEAaVQnUWcDWgl5.pdf'

Original File Name: SORE public comment 2.pdf

Date and Time Comment Was Submitted: 2021-11-24 11:34:19

No Duplicates.

**Comment 488 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Glenn  
Last Name: Amber  
Email Address: [gamber@westerbeke.com](mailto:gamber@westerbeke.com)  
Affiliation:

Subject: There are NO Feasible Alternatives to SORE Gasoline Generators  
Comment:

Please see the attached document.

Attachment: '[www.arb.ca.gov/lists/com-attach/863-sore2021-UDMCZQR3UGEHXgd0.pdf](http://www.arb.ca.gov/lists/com-attach/863-sore2021-UDMCZQR3UGEHXgd0.pdf)'

Original File Name: CARB SORE Regulation Proposal Comments - Final (2021-11-24).pdf

Date and Time Comment Was Submitted: 2021-11-24 11:53:33

No Duplicates.

**Comment 489 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jayne  
Last Name: Kaufman  
Email Address: jayne@1791.com  
Affiliation:

Subject: SORE 2021 - Small Off Road Engine Regulations  
Comment:

SORE 2021 will cause extreme hardships on people who depend upon generators during the power grid shutoffs. People need generators to refrigerate their medications, operate their medical equipment, and for heating and cooling during extreme temperatures. Electric chainsaws will not work for tree clearance during and after wildfires--they are underpowered and have short battery life. Cutting trees down before and during wildfires saves lives in preventing fire spread. Electric boat motors are inefficient and not compatible with the needs of emergency response, they will also leave people stranded in lakes, rivers, and oceans when the batteries expire. Electric batteries are detrimental to the environment, e.g., they leave toxic elements in landfills, the strip mining involved in procuring the materials for the batteries decimates the land, they catch fires that can't be extinguished.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 12:17:42

No Duplicates.

**Comment 490 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Fred  
Last Name: Morrison  
Email Address: grnfred@me.com  
Affiliation:

Subject: Air quality  
Comment:

Do all you can to help promote clean electronic garden equipment to  
replace polluting gas equipment as soon as we can.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 13:49:49

No Duplicates.



**Comment 491 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Rick

Last Name: Oropeza

Email Address: rick@frankandgrossman.com

Affiliation:

Subject: Small Off-Road Engine Regulations

Comment:

I agree that we should find a better solution than Gas powered small "Landscape" equipment to execute our work. However, I believe that in order for the execution to be successful more time will be needed to educate, train and implement across the Landscape Industry. The communication from State and local officials is poor in regards to explaining what the regulation actually means and how each individual and/or company can make sure to be compliant and prepare when the deadline rolls around. Most companies and individuals will not have the financial resources to prepare or set up their shop to support enough charging stations. I believe that state and local officials should immerse themselves with small to medium sized companies so they know exactly what challenges we will face and how they can help. Give us to 2028 to be inline with the phaseout of gas generators.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 14:00:40

No Duplicates.

**Comment 492 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kristen  
Last Name: Kessler  
Email Address: kess4652@gmail.com  
Affiliation: Hueneme School District

Subject: No more leaf blowers, please!

Comment:

Leaf blowers were the invention of a truly short-sighted individual. They are soul crushing and degrade everyone's quality of life.

For people who live in apartment complexes, like me, the leaf blower issue is particularly frustrating. As renters, we have no say in what happens with the landscaping, and are at the mercy of what the management deems to be an appropriate. I also hear leaf blowers at work. I am a substitute teacher, and often hear them during school hours. Do children need to be exposed to these pollutants? Does instructional time need to be lost due to the noise? We cannot expect nature to constantly conform to our silly, unrealistic standards.

In a forest, leaves are considered beautiful. The thought of using a leaf blower there would be ridiculous. Why is it so different anywhere else?

The world has enough problems. Leaf blowers should not be one of them.

Sincerely,  
Kristen Kessler

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 15:38:46

No Duplicates.

**Comment 493 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: L

Last Name: MAASSEN

Email Address: unidiversb@gmail.com

Affiliation: CSUDN- California Sea Urchin Divers Netw

Subject: Dangerous small engine law

Comment:

Please consider adopting an exemption application protocol and policy for business that must utilize non altered emissions systems on small engines in hazardous life and death situations. The dive harvest commercial fishing industry utilizes small engines to power "Air Breathing compressors" in salty, humid, wet often very rough weather marine environments.

Implementation of strict emissions and exhaust controls or mandating battery powered small engines in the aforementioned conditions can quickly render them very unreliable and extremely dangerous during dive operations.

Please note: Compromises to performance with small engines in favor of emissions in hazardous conditions could lead to injury or death in some occupational fields such as in commercial fishing operations.

By banning or limiting accessibility of small engines in the State of California you would inadvertently force the use of inferior parts, aftermarket or illegal replacement units which again can unnecessarily put life in jeopardy in the event of failure.

SOME INDUSTRIES NEED TO BE EXEMPTED FROM THIS REGULATION/LAW.

Thank You for your consideration

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-24 21:11:25

No Duplicates.

**Comment 494 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Christina  
Last Name: Benz  
Email Address: christinabbenz@gmail.com  
Affiliation: Napa Climate NOW!

Subject: Support for California's transition to clean lawn care equipment  
Comment:

SOREs are very polluting, especially so for the operator.

In Napa County we have designed a pilot program to put battery powered leaf blowers into the hands of small proprietor yard care operators. The operators would provide input so the program best meets their needs. We need funding from CARB to get this started. It could then be expanded to serve as a template for a statewide program.

I am a California resident and I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-26 06:22:41

No Duplicates.

## **Comment 495 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Filiberto

Last Name: Fonseca

Email Address: F.Fonseca@newpathlandscape.com

Affiliation:

Subject: Small engines gas ban will be detrimental to our business

Comment:

To whom it may concern,

I would like to share my sincere concerns towards the proposed gas small engines ban. We are a commercial landscape business that has been in operations since 2006 and currently employs over 100 full time employee's. Having personally been in the landscape industry since 1998 I feel that I have gained the experience necessary to provide real insight on this matter. We have had a few small municipalities in our service area implement a gas powered small engines ban over the years. Fortunately those clients were not large properties, therefor there was not a lot of area to maintain. In an effort to continue to service those clients we invested in a small number of battery operated pieces of equipment, blowers and hedge trimmers. Unfortunately not all of our clients were willing to accept a surcharge for the necessary acquisition of new equipment. Therefore we had no choice but to absorb the cost. Prior to acquiring the equipment we were informed by the distributors/suppliers that there was nothing available on the market at the time that would be efficient enough to use on a competitive level when compared to the gas powered equipment. The amount of batteries required to operate the equipment for the hours which we require would make the initial investment alone more than 2.5x that of the gas powered equipment. The ROI in gas savings was well over 2 yrs. Another big hurdle for us has been the ability to charge the batteries while on a job in a reasonable amount of time along with short battery life. There will also inevitably be locations where charging the batteries onsite will not even be an option.

If there is a state wide ban, we will most certainly find ourselves in a position in which we will not be able to provide our larger clients the same level of service in the same duration of time. This will force us to renegotiate our service contracts at a higher rate to account for the necessary added service time. There is no guarantee that our clients will be willing to increase our fees, and in most cases will seek out less expensive alternatives. In essence creating a situation for cheaper competitors to take business away, that otherwise would not have existed. Without stating every single challenge the ban would impose on our business, I can truthfully say it will create a drastic negative impact to our business. I plead to those in power to genuinely consider the strain this will impose on businesses like ours that utilize such pieces of equipment. And to please wait until the technology has advanced to the point where the battery powered option is really viable. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-26 14:08:28

No Duplicates.

**Comment 496 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bruce  
Last Name: Aird  
Email Address: bruceaird@gmail.com  
Affiliation:

Subject: All-electric leaf blowers  
Comment:

Dear Sir or Madam,

I just wanted to register my support for this legislation. Leaf blowers are intrinsically obnoxious devices to begin with, and while we may not be able to get rid of them totally, we can at least ensure that they aren't producing more greenhouse gases in a world already suffering from climate change.

Thanks for your time and consideration,  
Bruce A. Aird, Ph.D.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-26 20:49:25

No Duplicates.

**Comment 497 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jim  
Last Name: Spooner  
Email Address: joshdad@hotmail.com  
Affiliation:

Subject: Sore2021 Small off road engines  
Comment:

Please continue and accelerate the transition to zero emissions. I have been using all electric for yard equipment for years and have found no reason that gas powered are required. I use mixture or corded vs battery equipment. The cords took a little to get used to but no real issues certainly for vast majority of residential and a good number of commercial locations. Being home most of the time I know experience the smell as well as the noise pollution caused by the gas powered equipment used by homeowners and landscaping businesses. Very few locations have a large enough area that would require even non-corded equipment. Please give us all peace and quiet along with better air quality. Thanks for your support in this.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-27 14:39:18

No Duplicates.



**Comment 498 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alicia  
Last Name: Lippman  
Email Address: alicia@alilippman.com  
Affiliation:

Subject: Demand lower emissions  
Comment:

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, CARB must require 100% of the SOREs sold in California to be zero emission.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-27 18:52:24

No Duplicates.

**Comment 499 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mary  
Last Name: Robinson  
Email Address: marsmail21@gmail.com  
Affiliation:

Subject: Zero emission leaf blowers and lawn mowers  
Comment:

To ensure that all communities have breathable air in CA, CARB must require 100% of the SOREs sold in California to be zero emission.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

- \$8.8 billion in health insurance benefits through 2043
- 892 premature deaths avoided
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues

Please make the 100% requirement effective as soon as possible.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-27 19:13:53

No Duplicates.

**Comment 500 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Muriel  
Last Name: Strand  
Email Address: ecoengr@comcast.net  
Affiliation:

Subject: comments on SORE proposed amendments  
Comment:

please see attached

Attachment: '[www.arb.ca.gov/lists/com-attach/887-sore2021-BWZQOVQ4V2IXNAFv.pdf](http://www.arb.ca.gov/lists/com-attach/887-sore2021-BWZQOVQ4V2IXNAFv.pdf)'

Original File Name: comments SORE nov 2021.pdf

Date and Time Comment Was Submitted: 2021-11-27 22:14:32

No Duplicates.

**Comment 501 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sharon

Last Name: Cate

Email Address: sheriann@ojaivalleyinsurance.com

Affiliation:

Subject: AB 1346 Implementation Schedule

Comment:

Members of the California Air Resources Board,  
Ever since 1998, I have been advocating at the local level for a ban on gas-powered garden equipment. Initially the ideas fell on deaf ears. Over the years our community elected one city council member after another who held more sympathetic views. When they became the majority, gas-powered garden maintenance equipment was finally banned in the City of Ojai. It took just a short time for the professional landscape maintenance businesses to comply. The January 1, 2024 deadline stated in AB 1346 is a reasonable advance notification that would allow businesses and homeowners to comply. There are many reasons to stick to this schedule rather than extending the deadline, not least of which is the continuing damage to our air quality perpetrated by these carbon spewing machines.  
Please do not delay the implementation schedule of AB 1346.  
Thank you,  
Sharon Cate  
Ojai, CA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-28 11:48:41

No Duplicates.

**Comment 502 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kevin  
Last Name: Washington  
Email Address: kashington@itw.com  
Affiliation: ITW Construction

Subject: SORE Proposed Regulation Comments  
Comment:

Please find attached written comments to the Proposed Amendments to  
the Small Off-Road Engine Regulation.

Attachment: '[www.arb.ca.gov/lists/com-attach/889-sore2021-UThVJwdxVFgLblU6.pdf](http://www.arb.ca.gov/lists/com-attach/889-sore2021-UThVJwdxVFgLblU6.pdf)'

Original File Name: ITW Construction Comments to CARB SORE Ammendment\_FINAL  
112921.pdf

Date and Time Comment Was Submitted: 2021-11-28 14:16:22

No Duplicates.

**Comment 503 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Stuart  
Last Name: Sheldon  
Email Address: sheldon.stu@gmail.com  
Affiliation:

Subject: CARB  
Comment:

CARB's 2024 deadline on sales of gasoline-powered landscape equipment does not allow sufficient time for battery technology to develop a battery suitable for extended commercial use.

Permitting sales of gasoline-powered commercial grade landscape equipment until at least 2028 will allow further product development and improvement, reduce costs, and allow supply chain issues be solved.

Landscaper use of small gas-powered equipment produces less than a quarter of the exhaust created by these types of engines in California. Homeowner use is by far a greater source of pollution.

I know that more regulation is not desirable, but perhaps during the period between 2024 and 2028 sales of small gas-powered landscape equipment could be limited to contractors that hold, at least, some sort of business license (or proof that they are running a legitimate business) with sales quantities limited by business volume.

Just a thought.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-28 18:51:29

No Duplicates.

**Comment 504 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dennis  
Last Name: French  
Email Address: frenchman299@yahoo.com  
Affiliation:

Subject: Small off road engine regulations  
Comment:

This is the most asinine piece of legislation yet drafted by the fascists running the CA state legislature. This will negatively impact millions of consumers and hundreds if not thousands of businesses. What are these people thinking. That's the problem, they don't think. They just vote with their emotions on the climate change hoax and "green new deal." We need to clean house and replace every last one of these ccx worthless Democrat legislators that voted for this bill.  
Sincerely,  
Dennis French

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-28 19:15:23

No Duplicates.

**Comment 505 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Thomas  
Last Name: Canning  
Email Address: tmcanning@aol.com  
Affiliation:

Subject: Zero Emission SOREs  
Comment:

The use of gas-powered leaf blowers and lawn mowers can cause numerous health problems and contributes to poor air quality. California consistently fails to meet national air quality standards, which means millions of Californians breathe unhealthy air everyday.

California's communities and environment deserve better. To ensure that all communities have breathable air in the state, I strongly urge you to require 100% of the SOREs sold in California to be zero emission.

These new regulations, if adopted, will result in:

- \$8.8 billion in health insurance benefits through 2043
- 892 premature deaths avoided
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-28 22:57:56

No Duplicates.



## **Comment 506 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Christopher  
Last Name: Lish  
Email Address: lishchris@yahoo.com  
Affiliation:

Subject: We Need Zero Emission Leaf Blowers Now -- Notice of Public Hearing to Consider Proposed Am

Comment:

Monday, November 29, 2021

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: We Need Zero Emission Leaf Blowers Now -- Notice of Public Hearing to Consider Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions AND Public Availability of Additional Documents and Information

Dear Chair Randolph and Members of the California Air Resources Board,

I am a California resident and I strongly support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."  
-- Aldo Leopold

The use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, and greatly contributes to California's notoriously poor air quality. California continues to fail to meet national air quality standards, which means that millions of Californians like myself breathe unhealthy air every day.

California Air Resources Board's public health benefit analysis determined that these new regulations, if adopted, will result in:

- \* \$8.8 billion in health insurance benefits through 2043
- \* 892 premature deaths avoided
- \* 438 fewer emergency room visits for asthma
- \* 311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature also appropriated \$30 million for your agency to distribute to small proprietor landscapers to help them begin to acquire and transition to new, zero emission electric and

manual equipment. This is in addition to subsidies and buyback programs already led by air districts throughout the state.

This regulation will improve air quality, help to slow the climate crisis, improve human health, and save lives. Please approve and amend the Small Off-Road Engine regulations per the staff recommendation.

"The ultimate test of a moral society is the kind of world that it leaves to its children."  
-- Dietrich Bonhoeffer

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 06:58:34

No Duplicates.

**Comment 507 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John  
Last Name: McKnight  
Email Address: jmcknight@nmma.org  
Affiliation: NMMA

Subject: SORE Marine Generator Comments  
Comment:

Hello:

Please see and post the attached comments from the National Marine  
Manufacturers Association

Attachment: 'www.arb.ca.gov/lists/com-attach/895-sore2021-UT9SOQFtBTcAWVQ5.pdf'

Original File Name: NMMA Marine Generator Comments.pdf

Date and Time Comment Was Submitted: 2021-11-29 07:17:32

No Duplicates.

**Comment 508 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Erin  
Last Name: Gilbert  
Email Address: egilbert@jgcconsulting.com  
Affiliation: Pacific Crest Trail Association

Subject: SORE Regs  
Comment:

Please see attached letter.

Attachment: '[www.arb.ca.gov/lists/com-attach/897-sore2021-WioCZ1UgV2UEXVU5.pdf](http://www.arb.ca.gov/lists/com-attach/897-sore2021-WioCZ1UgV2UEXVU5.pdf)'

Original File Name: PCTA Letter to CARB.11.29.21[34].pdf

Date and Time Comment Was Submitted: 2021-11-29 08:51:15

No Duplicates.

**Comment 509 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Juergen  
Last Name: Hoffmann  
Email Address: juergen.hoffmann@stihl.de  
Affiliation:

Subject: STIHL Comments to Proposed Amendments to the SORE Regulations: Transition to  
Zero Emission

Comment:

Subject: STIHL Comments to Proposed Amendments to the Small  
Off-Road Engine Regulations: Transition to Zero Emissions

Dear Ladies and Gentlemen,

Please find attached the comments of ANDREAS STIHL AG & Co. KG.

Yours sincerely,

Juergen Hoffmann

-----  
Juergen Hoffmann Ph.D.  
Director Emissions & Regulatory Affairs

ANDREAS STIHL AG & Co. KG  
Andreas-Stihl-Strasse 4  
71336 Waiblingen  
Germany  
Telefon: +49 (0) 71 51 / 26 - 2763  
Telefax: +49 (0) 71 51 / 26 - 82763  
E-Mail: [mailto: juergen.hoffmann@stihl.de](mailto:juergen.hoffmann@stihl.de)  
Internet: <http://www.stihl.de>  
-----

Attachment: 'www.arb.ca.gov/lists/com-attach/898-sore2021-AHNQIIA4ADtWPAdY.pdf'

Original File Name: STIHL\_Comments\_to\_CARB\_2021\_11\_29\_V1.pdf

Date and Time Comment Was Submitted: 2021-11-29 09:18:46

No Duplicates.

**Comment 510 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: William  
Last Name: Jauch  
Email Address: bjauch@cglmgt.com  
Affiliation: CLCA

Subject: Ban on small gas powered engines  
Comment:

I run a small Landscape Maintenance Business which has 50 employees. At current technology for electrical landscape maintenance equipment I would not be able to convert from gas power equipment to electrical equipment. I would need to have 200 batteries for blowers, 100 batteries for string trimmers, 100 batteries for string trimmers, 120 batteries for 21 inch mowers, 160 batteries for 36 inch mowers, 200 plus batteries for small generates, sprayers, rototiller, aerators, seeders, and other gas powered landscape equipment. I would also have to have backup batteries on hand when the batteries do not charge properly. I would have to have approximately 880 plus batteries fully charged on hand every day to perform my daily operation. I would need to build a special area to be able to charge and store these batteries. I would need to know what type of facility and cost to be able to charge that many batteries. I would need approximately \$750,000.00 to buy the electrical landscape maintenance equipment with todays technology to make the conversion. I would have to pass this cost on to may clients to stay in business. I would suggest gradually making the transition as technology and the power grid becomes available. Let start with on type of equipment and see how the transition goes before banning all gas power equipment

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 09:17:48

No Duplicates.

**Comment 511 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dennis  
Last Name: French  
Email Address: frenchman299@yahoo.com  
Affiliation:

Subject: AB1346  
Comment:

No wonder more and more people are leaving CA every day with ill conceived Bill's such as this. I live in rural California and use a gas powered chainsaw, gas powered line trimmer, gas powered lawn mower, gas powered ATVs, gas powered generators. They are not going to save the planet by banning the sale of gas powered small engines. This is simply a "feel good" bill to appease the far left environmentalist Wackos. Lithium for batteries is mined using child slave labor. It takes fossil fuel to charge the batteries. If the batteries aren't recycled they will end up in landfills. What's next? Banning the import of gas powered small engines from out of state. Get a life and stop interfering with ours.  
Sincerely,  
Dennis French

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 10:28:58

No Duplicates.

**Comment 512 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Paul  
Last Name: Sousa  
Email Address: paul@wudairies.com  
Affiliation: Western United Dairies

Subject: Western United Dairies-SORE comments  
Comment:

Please see attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/901-sore2021-WzpUIFQ3Ag4CdwVq.pdf'

Original File Name: ARB SORE Comments\_WUD-final.pdf

Date and Time Comment Was Submitted: 2021-11-29 10:38:05

No Duplicates.



**Comment 513 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John

Last Name: McClelland

Email Address: john.mcclelland@ararental.org

Affiliation: American Rental Association

Subject: Comments on SORE Proposed Amendments

Comment:

File attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/902-sore2021-BWZSNQBzVmcKUwUo.pdf'

Original File Name: CARB - ARA Comments - SORE\_11.29.21.pdf

Date and Time Comment Was Submitted: 2021-11-29 11:13:42

No Duplicates.

## **Comment 514 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: DARRYL

Last Name: BRAAKSMA

Email Address: darryl.braaksma@alohasaw.com

Affiliation: Green Valley Aloha Saw and Mower

Subject: Attaining Zero Emissions

Comment:

I am greatly concerned the State of California has taken measures for attaining Zero Emissions by the elimination of Small Off-Road Engines will likely have a negligible effect in the quality of air and at a great expense and detriment of California residents and businesses.

California HAS NOT demonstrated its ability to provide reliable electrical power. Currently blackouts and brownouts are a common occurrence throughout the state. Currently the source of electricity for California is dependent on 60% non-renewable energy. Logically, an increase in electrical demand would need to be derived from non-renewable energy such as coal and LPG. Hence, the employment of battery powered equipment will place greater demand on the fragile electrical grid which in turn will require a greater amount of non-renewable resources to generate the electricity. This is NOT creating a state of having Zero Emissions.

An environment impact for battery powered equipment has not been published. A published report documenting the environmental impact and cost of Lithium battery production from cradle to grave. How much non-renewable fossil fuel is required for the production, recycle and disposal of the Zero-Emission battery?

The Battery Powered Industry for outdoor powered equipment is in its early phase. The cost of Battery Powered Equipment is generally three times that of a gas powered equivalent and with a fraction amount of efficiency. For example, a common commercial backpack blower which costs \$500 with a blowing force of 32 Newtons can be substituted with a Battery Powered Blower for \$1600 having only 17 Newtons blowing force.

At best, the current available Battery Powered Equipment is suited for residential user. Only for a limited number of applications does a battery powered tool make sense for commercial applications.

For example, a tree arborist will employ the small battery powered chainsaw whilst high in a tree for safety reasons. The largest battery powered chainsaw can power a small 18" bar whereas the forestry and fire response requires bars twice size in length. In terms of equivalent chainsaw power, the largest battery powered chainsaw is roughly equivalent to a 30cc gas powered chainsaw. A gas powered chainsaw designed for a 36" bar requires at least an 80cc gas powered engine. Hence there is no suitable battery powered equipment for forestry or fire fighting gas powered equipment, and the list goes on.

From my perspective, California should not be banning gas powered outdoor equipment 1) until it has demonstrated the ability to provide reliable and affordable derived from Zero-Emission renewable energy; 2) until a fully documented environmental impact

report documents the employment of batteries for powered equipment, from cradle to grave, will ultimately consume less non-renewable CO2 emitting energy; 3) without compliance with 1 & 2, at most the ban should apply to residential use only.

My Sincere Regards,  
Darryl Braaksma

Attachment: 'www.arb.ca.gov/lists/com-attach/904-sore2021-B2RTNFwvBDULUgk7.docx'

Original File Name: CARB 29 November 2021.docx

Date and Time Comment Was Submitted: 2021-11-29 11:31:44

No Duplicates.

**Comment 515 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Joseph

Last Name: Harding

Email Address: jharding@thomasamc.com

Affiliation: Portable Generator Manufacturers' Assoc.

Subject: Proposed Amendments to SORE Emission Regulations

Comment:

Please see the attached comments from the Portable Generator  
Manufacturers' Association on the proposed amendments to  
California's small off-road engine emission regulations.

Attachment: 'www.arb.ca.gov/lists/com-attach/905-sore2021-UyNQMV0xU2EGYwVq.pdf'

Original File Name: PgmaCommentsPotentialAmendmentsSoreEmissionRegulations112921.pdf

Date and Time Comment Was Submitted: 2021-11-29 11:44:08

No Duplicates.

**Comment 516 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: R. Calvin  
Last Name: Rasmussen  
Email Address: calvinr@buyroyce.com  
Affiliation: Royce Industries

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

Comment:

Comments Attached from Royce Industries and Custom Industries.

Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/906-sore2021-BnZUIARqU3ADagh7.pdf'

Original File Name: Proposed Amendments to the Small Off-Road Engine Regulations - Transition to Zero Emissions Equipment.pdf

Date and Time Comment Was Submitted: 2021-11-29 12:00:30

No Duplicates.

**Comment 517 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bob  
Last Name: Berlage  
Email Address: bobb@big-creek.com  
Affiliation:

Subject: Small Off-Road Engine Regulations  
Comment:

Please see attached comments

Attachment: '[www.arb.ca.gov/lists/com-attach/907-sore2021-VDZRNVEPU3QKY1UK.pdf](http://www.arb.ca.gov/lists/com-attach/907-sore2021-VDZRNVEPU3QKY1UK.pdf)'

Original File Name: BB to Carb 11-29-21.pdf

Date and Time Comment Was Submitted: 2021-11-29 12:27:38

No Duplicates.

**Comment 518 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sam  
Last Name: Humphrey  
Email Address: shumphrey@mitm.com  
Affiliation:

Subject: "Transition to Zero Emissions" Comments  
Comment:

Please see attached document.

Attachment: 'www.arb.ca.gov/lists/com-attach/908-sore2021-VThcM1V5ACcAKwZr.pdf'

Original File Name: Mi-T-M Letter to California Air Resources Board.pdf

Date and Time Comment Was Submitted: 2021-11-29 12:36:20

No Duplicates.

**Comment 519 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mariela  
Last Name: Ruacho  
Email Address: mariela.ruacho@lung.org  
Affiliation: American Lung Association

Subject: Health Group SORE Letter  
Comment:

Please see attached letter from health professionals and organizations.

Attachment: 'www.arb.ca.gov/lists/com-attach/909-sore2021-B28HZFQ0Um0BcwNr.pdf'

Original File Name: Health Group SORE Sign-On Letter\_Final.11.29.21.pdf

Date and Time Comment Was Submitted: 2021-11-29 12:16:08

No Duplicates.



**Comment 520 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Aiden  
Last Name: OBrien  
Email Address: aobrien@tcia.org  
Affiliation: Tree Care Industry Association

Subject: TCIA Comments on Proposed Amendments to the CARB SORE Regulations  
Comment:

Please see attached comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/911-sore2021-ADFVYgMsBGVSbQMt.pdf](http://www.arb.ca.gov/lists/com-attach/911-sore2021-ADFVYgMsBGVSbQMt.pdf)'

Original File Name: 11.29.21 TCIA\_CARB SORE Comments.pdf

Date and Time Comment Was Submitted: 2021-11-29 12:51:55

No Duplicates.

**Comment 521 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Patricia

Last Name: Hanz

Email Address: avujovic@emamail.org

Affiliation: EMA

Subject: EMA Comments to CARB SORE 2021

Comment:

The Truck and Engine Manufacturers Association submits the attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/912-sore2021-VzICaVw8Ag4EYQdo.zip'

Original File Name: EMA Comments - CARB Proposed Amendments to the Small Off-Road Engine Regulations.zip

Date and Time Comment Was Submitted: 2021-11-29 13:16:47

No Duplicates.

## **Comment 522 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ana

Last Name: Martinez

Email Address: martinezana2407@gmail.com

Affiliation:

Subject: Opposition CARB SORE2021 - Proposed Amendments to the Small Off-Road Engine Regulations

Comment:

I am writing to you today as a concerned constituent in opposition to CARBs proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers. Please submit these comments to the docket for the CARB SORE2021 rulemaking.

Moving forward with banning small engine powered equipment in 2024 would have numerous negative impacts on emergency responders, landscapers, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial, government and residential customers they service, at a time when local businesses are already reeling from the catastrophic effects of a global pandemic.

These proposals would drastically limit equipment choices for professional landscape contractors and outdoor power equipment dealers across California. We are small businesses who rely on small engine powered equipment every day as cost-efficient and high-performing solutions to install and maintain living landscapes and green spaces in communities throughout the state, and maintain our states critical infrastructure. Equipment choices and supply are already limited due to worldwide supply chain disruptions caused by COVID-19, and we do not yet see any indications of recovery and return to normal supply and demand.

Battery powered technology is also not appropriate for all applications and all users. Many rural areas lack the infrastructure needed to charge, transport safely and recycle battery powered equipment and this infrastructure will not exist at the scale necessary to meet the states accelerated timelines. And, battery powered equipment is simply not a viable option for many critical services, like fuel mitigation, infrastructure/utilities maintenance and tree care and clearing services that depend on small engine-powered equipment to keep our citizens and infrastructure safe.

While I appreciate the efforts of legislators and CARB to address Californias air quality needs, the small engine-powered equipment category is a comparatively minimal contributor to the states emissions. Further, the living landscapes our equipment is used to install and maintain contribute to tangible environmental benefits, including reductions in the heat island effect, carbon

sequestration, trapping dust and particulate matter, providing habitat for pollinators, and producing oxygen. Our gasoline powered products are also needed to combat the catastrophic toll that fires and other natural disasters have taken on our environment and communities in California.

With this in mind, I respectfully request CARB postpone efforts to ban small engine powered equipment until cost and performance of and infrastructure for comparable electric powered equipment meet commercial, emergency, and rural residential use needs. A delay in implementation would allow the worlds supply chain to recover from the worldwide pandemic that has disrupted production of all types of equipment including both battery and gas powered; and would allow time to develop solutions for our critical infrastructure workers who require gas powered equipment for their services. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 13:26:19

No Duplicates.

**Comment 523 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: david

Last Name: bezanson

Email Address: bezanpsy3506@hotmail.com

Affiliation:

Subject: SORE2021 rulemaking November

Comment:

Please see attached pdf.

Attachment: '[www.arb.ca.gov/lists/com-attach/914-sore2021-B3QAaVYIWG4EbAVq.pdf](http://www.arb.ca.gov/lists/com-attach/914-sore2021-B3QAaVYIWG4EbAVq.pdf)'

Original File Name: SOREnov2021CARB.pdf

Date and Time Comment Was Submitted: 2021-11-29 13:35:05

No Duplicates.

**Comment 524 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Greg

Last Name: Knott

Email Address: gknott@opei.org

Affiliation: Outdoor Power Equipment Institute

Subject: OPEI Comments to CARB SORE2021 Proposed Rule

Comment:

The Outdoor Power Equipment Institute (OPEI) respectfully submits the attached comments regarding the California Air Resources Board (CARBs) Proposed Amendments to the Small Off-Road Engine (SORE) Regulations: Transition to Zero Emissions.

Attachment: 'www.arb.ca.gov/lists/com-attach/915-sore2021-WjUBd1w4UGpSCwBj.pdf'

Original File Name: OPEI Comments to CARB SORE2020 Proposed Rules 211129 FINAL.pdf

Date and Time Comment Was Submitted: 2021-11-29 13:37:32

No Duplicates.

## **Comment 525 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John

Last Name: Saunders

Email Address: moosejohn1@gmail.com

Affiliation:

Subject: Opposition CARB SORE2021 - Proposed Amendments to the Small Off-Road Engine Regulations

Comment:

I am writing to you today as a concerned constituent in opposition to CARBs proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers. Please submit these comments to the docket for the CARB SORE2021 rulemaking.

Moving forward with banning small engine powered equipment in 2024 would have numerous negative impacts on emergency responders, landscapers, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial, government and residential customers they service, at a time when local businesses are already reeling from the catastrophic effects of a global pandemic.

These proposals would drastically limit equipment choices for professional landscape contractors and outdoor power equipment dealers across California. We are small businesses who rely on small engine powered equipment every day as cost-efficient and high-performing solutions to install and maintain living landscapes and green spaces in communities throughout the state, and maintain our states critical infrastructure. Equipment choices and supply are already limited due to worldwide supply chain disruptions caused by COVID-19, and we do not yet see any indications of recovery and return to normal supply and demand.

Battery powered technology is also not appropriate for all applications and all users. Many rural areas lack the infrastructure needed to charge, transport safely and recycle battery powered equipment and this infrastructure will not exist at the scale necessary to meet the states accelerated timelines. And, battery powered equipment is simply not a viable option for many critical services, like fuel mitigation, infrastructure/utilities maintenance and tree care and clearing services that depend on small engine-powered equipment to keep our citizens and infrastructure safe.

While I appreciate the efforts of legislators and CARB to address Californias air quality needs, the small engine-powered equipment category is a comparatively minimal contributor to the states emissions. Further, the living landscapes our equipment is used to install and maintain contribute to tangible environmental benefits, including reductions in the heat island effect, carbon

sequestration, trapping dust and particulate matter, providing habitat for pollinators, and producing oxygen. Our gasoline powered products are also needed to combat the catastrophic toll that fires and other natural disasters have taken on our environment and communities in California.

With this in mind, I respectfully request CARB postpone efforts to ban small engine powered equipment until cost and performance of and infrastructure for comparable electric powered equipment meet commercial, emergency, and rural residential use needs. A delay in implementation would allow the worlds supply chain to recover from the worldwide pandemic that has disrupted production of all types of equipment including both battery and gas powered; and would allow time to develop solutions for our critical infrastructure workers who require gas powered equipment for their services. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 13:47:52

No Duplicates.



## **Comment 526 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Francisco

Last Name: Lesaca

Email Address: JL@LESACALANDSCAPE.COM

Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Small Off-Road Engine Regu

Comment:

California Air Resources Board Members,  
My name is Francisco Lesaca. My wife and I own and operate Lesaca Landscape Company, Inc. in Bakersfield, CA. We have 12 full time employees, which we are proud to say have been with us on average for 15 years. Our landscape services include design, build and maintenance. My father and mother started the business in 1974. We hope to continue what they started.

I have a deep concern for the new proposed amendments to the small off-road engine regulations and the time in which you want to implement them. I understand the need to reduce our carbon footprint. And being a lifelong resident of the central valley, I understand how important our air quality is to us. But to do a complete ban by 2024 of all gas engines under 25 hp will create a financial hardship for me and many small businesses owners. Every piece of small equipment I have is under 25 hp. Which include mowers, blowers, chainsaws, edgers, string trimmers, plate compactors, aerators, pressure washers, power brooms, augers and concrete saws. We take care of our equipment so it will last us a long time. We try to 3-10 years life out of every piece of equipment. And we only buy professional equipment that we know is dependable and can handle the riggers of our work. It's taken us years to find the right equipment that meets our standards. Now you are asking us to do the same thing with electric equipment in less than 3 years. This is a hard pill to swallow. Its not just the new equipment we will need to purchase. But the cost of setting up our shop, trucks and trailers with charging stations and even maybe solar panels. I don't know where to begin!!!

I hope you can reconsider this timeline of 3 years and extend it to 10+ years. By then, maybe the battery technology will be more advanced. Also, with more time the cost of the equipment may be more comparable to our current gas-powered equipment. If anything, the added time will help us phase out our old gas power equipment and purchase the new battery equipment.

Best Regards,

Javier Lesaca

Lesaca Landscape Company

661-836-0229

[www.LesacaLandscape.com](http://www.LesacaLandscape.com)

CSLB LIC# 645961

Certified Landscape Irrigation Auditor #52771

ISA Certified Arborist WE-12862A

CA DPR QAL LIC# - 131619

Attachment: 'www.arb.ca.gov/lists/com-attach/917-sore2021-AGNTNFE8WGIKaIU6.docx'

Original File Name: California Air Resources Board Letter.docx

Date and Time Comment Was Submitted: 2021-11-29 13:45:39

No Duplicates.

**Comment 527 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Eric  
Last Name: Woodruff  
Email Address: eric.woodruff@generac.com  
Affiliation: Generac Power Systems

Subject: Proposed SORE Regulations  
Comment:

Generac's comments on Proposed SORE Regulations

Attachment: '[www.arb.ca.gov/lists/com-attach/918-sore2021-VjFWNVc4WG4BdVQ1.pdf](http://www.arb.ca.gov/lists/com-attach/918-sore2021-VjFWNVc4WG4BdVQ1.pdf)'

Original File Name: Generac SORE Rulemaking Comments.pdf

Date and Time Comment Was Submitted: 2021-11-29 13:47:29

No Duplicates.

**Comment 528 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dan  
Last Name: St Martin  
Email Address: smartin.dan@basco.com  
Affiliation: Briggs & Stratton, LLC

Subject: SORE 2021 Dec 9 Hearing Briggs & Stratton  
Comment:

Briggs & Stratton, the leading American small engine manufacturer, submits these comments to the recently announced changes to CARB's proposed amendments to the Small Off-Road Engine ("SORE") Regulations Transition to Zero Emissions.

Attachment: 'www.arb.ca.gov/lists/com-attach/919-sore2021-VyQHbgFyU2UDWldl.pdf'

Original File Name: SORE 2021 Dec 9 Hearing Briggs & Stratton.pdf

Date and Time Comment Was Submitted: 2021-11-29 13:54:17

No Duplicates.

**Comment 529 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Megan  
Last Name: Rios  
Email Address: megan@riosdesign.com  
Affiliation: CLCA

Subject: SORE proposed amendments  
Comment:

Although I am a Landscape Architect, I work closely with the green industry leaders, licensed landscape contractors who install and/or maintain residential, commercial and municipal properties. The amendment proposes banning gas-powered engines of 25HP or less and replacing them with very expensive batteries that are not capable of lasting throughout a work day, demanding multiple batteries for any private or public landscape maintenance company. These batteries are not recyclable needing assistance from the coal industry and will ultimately end up in landfills polluting our soils and contaminating our ground water. It is environmentally unethical and costly, specifically to be put in place by 2024. The CARB committee should extend the date until 2028 when this new battery powered devices can be manufactured and maintained effectively and economically so that existing landscapes can be properly maintained. Please also consider the economic impact the change to this new ruling to the owners and tax payers will be to properly make this change throughout California. Please consider the extention.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 13:43:09

No Duplicates.

## **Comment 530 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Byron  
Last Name: Lafferty  
Email Address: byron@steamcleanersinc.com  
Affiliation: Steam Cleaners, Inc.

Subject: concerns regarding AB 1346  
Comment:

To whom it may concern,

I am speaking as a sales manager for a distributor of high pressure washers located in Central California. I have many concerns regarding the passage of AB 1346 pertaining to the phasing out of the sale of small off-road engines, but I will provide comments on a few in particular. I am certain that the negative economic and water conservation impacts as well as the negative impact to the public health of the communities that we serve would greatly outweigh the perceived benefits of phasing out the sale of small off-road engines.

Socio-economic impact:

One of the biggest opportunities for aspiring entrepreneurs is to get into the pressure washing sanitation business due to the relatively low barriers to entry in terms of cost and the (currently) limitless opportunities and needs for sanitation. The majority of these businesses require small off-road engines to run their pressure washer equipment due to their portability and versatility. With the passage of this legislation, we are essentially eliminating tens of thousands of California jobs, many of which are held by minorities. This legislation would be very regressive and further expand the socio-economic gap.

Health impact:

Considering we are in the midst of a global pandemic which has already claimed over 750,000 American lives; I would think that protecting one of the key means of public sanitation would be a top priority. This legislation would cripple the efforts of our customers who provide commercial and public sanitation services.

Water conservation impact:

As we all know, we are in the middle of a drought in California. Pressure washers use less water than other cleaning methods, including a standard hose. While the water in a pressure washer spews out with greater force, it uses about 50% to 70% less water. A typical hose puts out between six to ten gallons per minute (GPM), while a conventional pressure washer uses between two and five GPM.

I have full faith in American innovation and I assume that there will be battery-powered pressure washers at some point in the future which will be able to replace existing small, off-road engine pressure washers, but the technology isn't available yet, and it almost certainly won't be available by January 2024. We need

to be strategic and ensure that we don't create a massive gap in our public health response, drive ourselves into a deeper hole with respect to the drought, and destroy the livelihood of tens of thousands of small businesses before we have a viable alternative technology for providing necessary sanitation services.

Thank you for your consideration.

Sincerely,  
Byron Lafferty

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 13:29:06

No Duplicates.

**Comment 531 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael

Last Name: Ochs

Email Address: mochs@rvia.org

Affiliation: RV Industry Association

Subject: RVIA Comments on Proposed Amendments to Small Off-Road Engine Regulations  
Comment:

Attached please find the comments of the RV Industry Association to the proposed amendments to the Small Off-Road Engine regulations. Please feel free to contact me if you have any questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/922-sore2021-VScBcQFpADIDWgVm.pdf'

Original File Name: RVIA Comments on the proposed SORE amendments – Nov 29 final with attachments.pdf

Date and Time Comment Was Submitted: 2021-11-29 14:04:54

No Duplicates.



## **Comment 532 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: William  
Last Name: Applegate  
Email Address: bud@applegate.co  
Affiliation:

Subject: Opposition CARB SORE2021 - Proposed Amendments to the Small Off-Road Engine Regulations

Comment:

I am writing to you today as a concerned constituent in opposition to CARBs proposed rule to ban small engine powered equipment in California by 2024. These proposals, if enacted, would result in significant hardships for my small business, and my customers. Please submit these comments to the docket for the CARB SORE2021 rulemaking.

Moving forward with banning small engine powered equipment in 2024 would have numerous negative impacts on emergency responders, landscapers, outdoor power equipment dealers, and other businesses throughout the state of California, as well as their employees, and the various commercial, government and residential customers they service, at a time when local businesses are already reeling from the catastrophic effects of a global pandemic.

These proposals would drastically limit equipment choices for professional landscape contractors and outdoor power equipment dealers across California. We are small businesses who rely on small engine powered equipment every day as cost-efficient and high-performing solutions to install and maintain living landscapes and green spaces in communities throughout the state, and maintain our states critical infrastructure. Equipment choices and supply are already limited due to worldwide supply chain disruptions caused by COVID-19, and we do not yet see any indications of recovery and return to normal supply and demand.

Battery powered technology is also not appropriate for all applications and all users. Many rural areas lack the infrastructure needed to charge, transport safely and recycle battery powered equipment and this infrastructure will not exist at the scale necessary to meet the states accelerated timelines. And, battery powered equipment is simply not a viable option for many critical services, like fuel mitigation, infrastructure/utilities maintenance and tree care and clearing services that depend on small engine-powered equipment to keep our citizens and infrastructure safe.

While I appreciate the efforts of legislators and CARB to address Californias air quality needs, the small engine-powered equipment category is a comparatively minimal contributor to the states emissions. Further, the living landscapes our equipment is used to install and maintain contribute to tangible environmental benefits, including reductions in the heat island effect, carbon

sequestration, trapping dust and particulate matter, providing habitat for pollinators, and producing oxygen. Our gasoline powered products are also needed to combat the catastrophic toll that fires and other natural disasters have taken on our environment and communities in California.

With this in mind, I respectfully request CARB postpone efforts to ban small engine powered equipment until cost and performance of and infrastructure for comparable electric powered equipment meet commercial, emergency, and rural residential use needs. A delay in implementation would allow the worlds supply chain to recover from the worldwide pandemic that has disrupted production of all types of equipment including both battery and gas powered; and would allow time to develop solutions for our critical infrastructure workers who require gas powered equipment for their services. In the meantime, I encourage CARB to work with equipment manufacturers to explore additional small engine emission reduction technologies that can be implemented in the near future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 14:41:00

4 Duplicates.

**Comment 533 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Andrew  
Last Name: Bray  
Email Address: andrew@landscapeprofessionals.org  
Affiliation: National Assoc. of Landscape Prof.

Subject: Landscape Industry (NALP) Urges Delay for Commercial Grade Equipment Beyond 2024

Comment:

Dear CARB Board Members,

The National Association of Landscape Professionals (NALP) is the national trade organization representing the \$98 billion landscape industry employing over 1.4 million employees in the United States.

Member companies specialize in lawn care, landscape maintenance, tree care, irrigation and water management. Landscape professionals throughout the nation work daily performing essential services to homes and businesses to maintain their landscapes, sustain the environment and enhance and maintain healthy and safe green spaces.

We are writing to you on behalf of our member companies concerning Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions, Initial Statement of Reason (ISOR) published October 12, 2021. We are respectfully requesting you to support an amendment to the ISOR and delay implementation of the transition to Zero Emissions Equipment (ZEE) ONLY for commercial/professional grade small off-road engines (SORE).

Please see attached comments for complete explanation and supporting materials.

Attachment: 'www.arb.ca.gov/lists/com-attach/925-sore2021-VzRQN1YIWWgKU1U7.pdf'

Original File Name: CARB NALP FINAL COMMENT PACKET 11\_29\_21.pdf

Date and Time Comment Was Submitted: 2021-11-29 15:03:22

No Duplicates.

**Comment 534 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: John

Last Name: Knox

Email Address: jtimothyknox61@gmail.com

Affiliation:

Subject: For Our Kids, Let's Ban Small Off-Road Engines Now

Comment:

I have been an elementary and middle school teacher in the Southern California for almost 25 years. More and more, I am getting concerned about the kind of world we adults will be leaving to the children I teach. Many of my students suffer from asthma or other respiratory issues, and many are rightfully worried about emissions, climate change and environmental degradation. Now is the time to act to alter course and do much more to assure a better future for these kids. One way to start is by approving the rule to promote the use of zero-emission landscape equipment. Gas-powered landscape equipment, especially leaf blowers, are a noisy, dirty nuisance. My students and I cannot sit idly by while these terrible, high-polluting machines continue to assault our ears, our lungs, and our atmosphere. Perfectly good electric-powered substitutes exist. Many landscapers probably have the same concerns we do and will probably welcome the new rule. Please do the right thing and ban small off-road engines, and take a big step toward removing gas-powered leaf blowers from our lives. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 14:56:13

No Duplicates.

**Comment 535 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Mike  
Last Name: Richardson  
Email Address: mrichardson@oconjet.com  
Affiliation: O'Connell Jetting Systems

Subject: CARB OUTLAWING GASOLINE ENGINES IN CALIFORNIA  
Comment:

This CARB regulation will destroy 10's of thousands of businesses  
jobs in California.

I am totally against this regulation. No wonder everybody is  
leaving California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 15:20:21

No Duplicates.

## **Comment 536 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Alan

Last Name: Bonifas

Email Address: all-spray@hotmail.com

Affiliation: CETA (Cleaning Equipment Trade Associati

Subject: Proposed amendments to sore regulations

Comment:

To the California Air Resources Board:

As a dealer of pressure cleaning equipment for over 37 years and the current president of CETA I appreciate the opportunity to submit comments on the proposed regulation and any possible amendments. I agree with the CARB board in their resolve to improve the air quality and reduce greenhouse gases. I also believe that small engines and their lack of emission control advancements have a detrimental effect to air quality. I also realize that ZEE tools are the direction of the future.

So while I agree on these things I also believe that the negative societal and economic impact from banning small engines on commercial (not residential) pressure washers will outweigh the incremental increase in air quality and reduced emissions. The main reason for this is that the technology for ZEE type industrial pressure washers is non existent and not feasible. Having experience in the pressure pump industry from a supplier standpoint I understand the torque and power requirements for industrial pressure washers and there is no feasible size or feasible cost for a battery powered industrial pressure washer. Most commercial pressure washing equipment uses 8 to 20 electric brake horsepower at full load to do their job. By jobs I am referring to graffiti abatement, cleaning city sidewalks and downtown areas, cleaning parks, cleaning and sanitizing playground equipment, cleaning invasive species off of boats, also many types of industrial and commercial and agricultural cleaning that are a necessity not a luxury or for aesthetic reasons.

So I propose that the board amend the regulation to exempt industrial pressure washing equipment with engines above 250CC until 2028 like generators or until feasible technology exists whichever comes sooner.

Respectfully submitted:

Al Bonifas, owner

ALLSPRAY 121 Main st. Swanton, Ohio 43558

CETA president 2021-2022

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 15:35:00

No Duplicates.

## **Comment 537 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Brandon  
Last Name: Whitney  
Email Address: brandon@psiproducts.com  
Affiliation: Pressure Washer dealer

Subject: Pressure washers and steam cleaners sanitize.

Comment:

PSI is a small local business that has been an authorized dealer of industrial cleaning equipment for about 40 years. We specialize in selling and repairing pressure washers and steam cleaners, 2 pieces of equipment that are targeted for removal from the market by AB1346.

This bill would without a doubt quickly put our company, as well as most of our customers, out of business. While we understand the idea behind the bill is valid and will lead to a reduction in pollution, it will also lead to the destruction of the cleaning industry as we know it. Schools, hospitals, food processing facilities, municipalities, sports facilities and more: all rely on the power of pressure washers and steam cleaners to clean effectively and thoroughly.

Currently there is no technology available to transition to battery-operated or electrical hot water pressure washers or steam cleaners. The batteries required to run our equipment do not exist, and the demand on the existing electrical grid to run our machinery would be overwhelming.

Also, the lithium batteries that would be required due to this bill would present an enormous expense to all of the industries currently using pressure washers and steam cleaners, and could present an additional problem for the environment. Disposing of these batteries could prove to be a bigger problem for the environment than our equipment does.

Please delay the implementation of this bill for industrial users of this equipment. The unintended consequences of this bill will be detrimental to not only the sellers of the equipment, but also the users. Landscapers, car detailers, building maintenance personnel, large venues personnel and many more will need to spend a great deal of money to comply or close their business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 15:39:57



No Duplicates.

**Comment 538 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David  
Last Name: Johnson  
Email Address: dave@steamcleanersinc.com  
Affiliation: SCI

Subject: Small Off-Road Engine Regulations  
Comment:

I find this legislation to be racist and insensitive. Most of the Contract Cleaners in this State are from Diverse Backgrounds. If you eliminate there ability to wash by imposing limitations on what equipment they can buy or having no viable alternatives basically kills this industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 15:46:46

No Duplicates.

**Comment 539 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ben

Last Name: Granholm

Email Address: ben@westernpga.org

Affiliation: Western Propane Gas Association

Subject: WPGA Comments RE SORE Regulation

Comment:

See attached document

Attachment: 'www.arb.ca.gov/lists/com-attach/931-sore2021-UiVQJl07VGYCWwFi.pdf'

Original File Name: WPGA Comments RE Potential SORE Amendments - 11.29.21.pdf

Date and Time Comment Was Submitted: 2021-11-29 15:47:48

No Duplicates.

**Comment 540 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: trevor  
Last Name: henton  
Email Address: trevoralanhenton@gmail.com  
Affiliation:

Subject: ban on small engines  
Comment:

this proposal to ban all small gas engines under 25hp is dangerous and should never be passed. there is no alternative at this point. how can you provide cleaning service to the windmills that produce power? you cant pressure wash for 8 hours in the middle of the dessert at night without a gas generator. california doesnt have the power grid to run the citizens A/C units at home after 4pm without having grid shut downs. SDGE shuts down peoples power during high winds for days at a time how will rural counties keep food? i agree to regulate some but its not possible to do all.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 15:57:18

No Duplicates.

**Comment 541 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Blanca

Last Name: Segura

Email Address: office@unitedpressuresystems.com

Affiliation: UNITED PRESSURE SYSTEMS

Subject: AB 1346

Comment:

I am wrtiting today as a small business owner in opposition to AB1346. If this were to pass, I along with hundreds, if not thousands, of other small businesses throughtout CA would cease to exist. We are in the business of selling commercial pressure washers, which help keep our cities clean. We sell both gas powered and electric powered units and most of our clients (small businesses like us) opt for gas powereed units for obvious reasons. Electric powered units are no match compared to gas powered units. We are just not at a place where electric powered units will be as effective. Not to mention more water will have to be used, longer cleaning times, financial burden of purchasing all new equipment, multiple batteries required to complete a job, all existing users having to charge batteries every night and day, the toxic chemicals inside batteries (doesn't this also affect the environment?)etc. The loss of hundreds or thousands of small businesses will result in higher un-employment rates and higher rates of people on government assisted programs to get by due to loss of income. Please reconsider.

Sincerely,  
Small CA Business Owner

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 15:40:45

No Duplicates.

**Comment 542 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Sandra

Last Name: Giarde

Email Address: sandragiarde@clca.org

Affiliation: California Landscape Contractors Assn.

Subject: Comments on Proposed Amendments to SORE Regulations

Comment:

Please find attached our comments and suggested amendment to the proposed amendments to SORE regulations.

Attachment: 'www.arb.ca.gov/lists/com-attach/934-sore2021-c03CTaGfldXsAY8Q.pdf'

Original File Name:

CLCA\_SORE\_Rulemaking\_Comment\_Letter\_FINAL\_November\_29\_2021.pdf

Date and Time Comment Was Submitted: 2021-11-29 16:21:44

No Duplicates.

## **Comment 543 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Greg  
Last Name: Sprunk  
Email Address: gregs@sceclean.com  
Affiliation: Business Owner in SD

Subject: SORE2021 Regulations  
Comment:

My name is Greg Sprunk and I am the President of Superior Cleaning Equipment. I have owned this company for 30 years. 25 years we have been in Southern CA in San Diego.

We sell and service pressure washers, aqueous parts washers, wash water recycling systems as well as service, parts and accessories for the above items.

We primarily deal with industrial cleaning equipment generally with 10HP to 25 HP engines. Those pressure washers are able to conserve water over a standard water hose, sometimes as much as 3-4 times.

It was inconceivable to me that much thought went into these regulations in regards to the industrial applications that they are going to be affecting. There is no battery technology that will allow a user to clean anything above 1500 psi at this current time. Pressure washers use a tremendous amount of energy but also conserve a great amount of water as mentioned above. Any outside surface that is currently being cleaned from your civic centers to restaurants to ships to boardwalks to hotels to entertainment venues such as Legoland, Sea World all use over 3000 psi. There are no replacements for that. A water hose is not going to cut it. Let me give you just one example out of 1000. Cleaning the hulls of military ships. Most contractors use 5000 psi or more. In order to power that you need to have a very large 460V highly charged cord which is not very safe and now you have the water factor as well. Ever try removing chewing gum from your driveway with a water hose? I guess you could get out there with a chisel but you still won't have a clean surface.

And it's not just pressure washers. With the issues facing California in regards to wildfires there are no chainsaws that run on battery power that are above 15 to 20 inches long. Nothing industrial. Are you expecting that the forest service wheels out a large diesel generator with about 20 extension cords to runoff into the forest to maintain the utility areas that are continuing to catch fire? Up in a tree with extension cords? So you've reduced emissions from the smaller chainsaws but now have a large diesel generator that is putting out as much if not more than the smaller units. And by the way the generators run the entire time. Gas powered chainsaws turn off and on.

it's easy to take a broad sweeping approach to an incredibly complicated issue that obviously has not had much research done in terms of how it will affect the cleanliness, safety and population

base in major areas. I don't have a problem with getting rid of smaller two-stroke engines where there's battery technology to be as equal or better. I have an electric battery powered blower for my home. I can use an electric powered pressure washer at 1500 psi to clean the outside of my house. For my small yard I can use a battery powered lawn mower. But that technology is not available to service large areas, parks for example.

And based on previous summers in California, you are now going to load up the infrastructure and in spite of rolling blackouts, now everybody's going to be charging their batteries on every single item mentioned above and that's not going to affect or increase the use of electricity? Which we already do not have enough of?

What's happening here is what has happened time and again. Legislation that is going to be on the backs of small business people, who make up the back bone and fabric of the communities are going to be the first ones to suffer. There are other options. Limiting horsepower under 5 for example. Taking a wade-in in approach instead of a plunge and see how technology can or will catch up.

A lot of people here talking about how small are gas powered blowers or lawnmowers are causing them a lot of distress and air pollution. And I sympathize with that. But the overreach here in terms of horsepower here is going to have a crippling affect on the small business cleaning, landscaping, services business that has not been thought through. And when you go to your local facilities and see somebody hand brushing with a bristle brush the venue, then using 8 to 10 gallons a minute from a water hose it's going to catch you that this might not be the best approach.

There's a better way to go about this, not the sledgehammer all encompassing, under 25 hp catastrophe that this is about to rain down on this great state. Let's make sure the technology can handle the regulation. At this time it cannot.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 16:07:22

No Duplicates.



**Comment 544 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Dustin

Last Name: Hamm

Email Address: dustinhamm@ecifuelssystems.com

Affiliation:

Subject: Proposed SORE Regulations 2024

Comment:

Please see attachment for comments regarding proposed 2024 regulations.

Attachment: 'www.arb.ca.gov/lists/com-attach/937-sore2021-UzZcOV01V1sFZQF0.pdf'

Original File Name: ECI Fuel Systems (SORE Proposal 2024).pdf

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

No Duplicates.

**Comment 545 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: Adopt Small Off-Road Engine Rule Implementing AB 1346 (Berman & Gonzalez)

Comment:

Please find our group sign on letter attached. Thank you.

Attachment: '[www.arb.ca.gov/lists/com-attach/938-sore2021-VyRXPgd0ADZSCwdk.pdf](http://www.arb.ca.gov/lists/com-attach/938-sore2021-VyRXPgd0ADZSCwdk.pdf)'

Original File Name: SORE comment letter to ARB for group sign-on.pdf

Date and Time Comment Was Submitted: 2021-11-29 17:20:13

No Duplicates.

**Comment 546 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Phil  
Last Name: Petty  
Email Address: ppetty@williamscleaning.com  
Affiliation: Williams Cleaning Systems

Subject: SORE 2021

Comment:

In the Pressure Washer Business we rely on a gas engines to provide quality & powerful equipment. In our experience with electric pressure washers they aren't effective for industrial, commercial & other vast application of other jobs. Plus a lot of the jobs pressure washer are used for are not near a power source. Our business is selling, maintaining & repairing pressure washers along with other cleaning equipment. Just since the start of this bill, things are negative of where businesses would go. Not only ours but our customers business's. We believe a delay or abolishment in implementing this bill would help a lot of small business stay in business & make the economy better.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 17:37:27

No Duplicates.

**Comment 547 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jamie  
Last Name: Schmidt  
Email Address: Jamie@pwmca.org  
Affiliation:

Subject: Proposed Amendments to the Small Off-Road Engine Regulations  
Comment:

To whom it may concern,  
My name is Jamie Schmidt and I'm the founder of the Professional  
Worldwide Mobile Cleaning Association. We are an association of  
mobile cleaning contractors that train cleaning contractors  
throughout the country. This ban on small engines will directly  
hurt contractors abilities to keep exterior surfaces clean. Keeping  
exterior surfaces clean is an important part in our public safety  
by sanitizing and also reducing slip and falls on flat surfaces.  
Thank you for hearing me in this matter if you have any questions  
feel free to give me a call 856-829-5449  
Jamie Schmidt  
Www.pwmca.org

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 18:06:47

No Duplicates.

**Comment 548 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Leigh

Last Name: Kammerich

Email Address: lkammerich@rcrcnet.org

Affiliation: Rural County Representatives of CA

Subject: Proposed Amendments to the SORE Regulations, Transition to Zero Emissions  
Comment:

Please see the attached letter regarding the CPUC Environmental & Social Justice Action Plan, Draft Version 2.0. Please contact RCRC Regulatory Affairs Advocate, Leigh Kammerich, at (916) 447-4806 or lkammerich@rcrcnet.org if you have questions or would like to discuss further.

Attachment: 'www.arb.ca.gov/lists/com-attach/944-sore2021-VyddKQNtWHsBaAR3.pdf'

Original File Name:

Proposed\_Amendments\_to\_the\_SORE\_Regulations\_Transition\_to\_Zero\_Emissions\_2021-11-29\_FINAL.pdf

Date and Time Comment Was Submitted: 2021-11-29 18:17:56

No Duplicates.

**Comment 549 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: GREGORY  
Last Name: CROSS  
Email Address: gcross@nilfisk.com  
Affiliation:

Subject: SORE Delay for pressure washers  
Comment:

Dear CARB,

Thank you for giving us a platform to express our concerns. I've been in the pressure washer industry for 30-years, first building them then repairing them, teaching our dealer network how to repair them and now I sell them to our dealers in the NW territory. While most pressure washers we manufacture are between 5-horsepower and somewhere under 25-horsepower, I don't believe our industry will have a feasible non-emission alternative before January 2024.

These pressure washers (both hot and cold water) are used in many industries throughout my territory (including Northern California) for many applications. Some of the more notable uses which CARB and the state of California should take interest in are:

Invasive species (quagga / zebra muscle) decontamination to keep our waterways clean and invasive species free / Clean-up and sanitizing of dismantled homeless camps / Graffiti removal / Cleaning of equipment at farms and dairies to prevent cross-contamination / Environmental clean-up such as the efforts right now at Huntington Beach / General cleaning and sanitation of outdoor areas / Washing of solar panels to optimize output.

While these are just a few uses for pressure washers, I'm glad to have a chance to voice my thoughts.

Thank you,

Greg Cross, Nilfisk HPW

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 18:18:00

No Duplicates.



**Comment 550 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael

Last Name: Geller

Email Address: mgeller@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on CARB's Proposed Amendments to the Small Off-Road Engine Regulations

Comment:

Please find comments from the Manufacturers of Emission Controls Association (MECA) on CARB's Proposed Amendments to the Small Off-Road Engine Regulations.

Attachment: 'www.arb.ca.gov/lists/com-attach/947-sore2021-BmtSMVY0UmAEXQNw.pdf'

Original File Name: MECA SORE Comments 11292021.pdf

Date and Time Comment Was Submitted: 2021-11-29 18:55:11

No Duplicates.



**Comment 551 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Meg  
Last Name: Pelose  
Email Address: pelose@att.net  
Affiliation:

Subject: Zero emission Leaf blowers  
Comment:

We need to move to zero emission leaf blowers as soon as possible!  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 19:30:29

No Duplicates.

## **Comment 552 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Michael

Last Name: Ricketts

Email Address: miker@hotsysocal.com

Affiliation: Hotsy of Southern CA

Subject: Stop the Madness on Pressure Washer Ban of Gas Engines

Comment:

I am an industrial supplier to commercial cleaning industry (pressure washers, floor scrubbers, detergents, sanitizers, disinfectants servicing (municipalities / office parks / retail /residential customers) in the greater Los Angeles area for the last 20 years.

I proudly come from the Anaheim community located in Orange and Riverside county. I employ 12 workers and we take great pride in the service we provide the community.

Within the last year, we partnered with County of Orange, CALTRANS, City of LA, multiple municipalities, food plants, construction companies, transportation, transit, etc, to provide

gas powered pressure washers to clean and sanitize everything from schools, food plants, transit buses, bus stops, homeless encampments, CalTrans vehicles, public property, and the most efficient tool we use is an internal combustion powered pressure washer. Beyond this we have x of crews working daily. The mandate of no internal combustion engines being considered would eliminate the jobs of nearly all of our staff.

We care deeply about a clean environment for both the health of our neighbors and beauty of our community. (where applicable) We have participated in water recovery / water treatment as well as propane burner usage in accordance with all state and local regulations.

Elimination of these cleaning devices will decrease public safety, decrease the ability to clean and sanitize, and keep California as the jewel of a state we all love. Banning these small engines eliminates any acceptable solution for portable pressure washing. Thousands of cleaning companies, municipal staffs, transit workers, port workers, state employees will be left with no cleaning solution for hard to clean surfaces away from a major electrical source. There is no battery to run a pressure washer. That technology may come some day, but in the meantime, you have put the horse behind the buggy. You are cutting off your nose to spite yourself. Do you want excess dirt and bacteria filling the outside areas of restaurants? Do you want sidewalks crusted with spoiled food and bacteria at public event centers such as a football or baseball stadium? Do you want the building you work at to have uncleaned entrances? Please, take a moment and ask yourself if this is the right thing to do. You are creating a human health and economic crisis with this ruling. I beg you to use just a bit of common sense. It is easy to hand down decisions from the halls of government. Call your state agencies and municipalities. Call the schools. Call the event centers. Call the universities. Call the churches. Ask if they can keep their employees, students, visitors, and fans safe without the gas powered pressure washer. I know the answer. Do you?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 19:26:13

No Duplicates.

## **Comment 553 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Casey

Last Name: Meelker

Email Address: cmeelker@hydrotek.us

Affiliation: Hydro Tek Systems Inc.

Subject: Benefits of SORE used on Commercial Pressure Washers

Comment:

Dear California Air Resources Board:

I write to you regarding the proposal to eliminate Small Off-Road Engines beginning January 1, 2024 and about the severe impact that it will have on various aspects of the lives of the citizens of our wonderful state. My wife and I we both born and raised in the beautiful state of California, and love raising our children here. I am employed by a company that manufactures pressure washers in Redlands, California. This manufacturing facility employs more than 50 people at this Redlands facility who build pressure washers and support this Californian manufacturing facility. These pressure washers are sold to distributors, many of which are Californian small businesses for whom a significant portion of their livelihood is made by reselling these gas powered pressure washers to local municipalities and Californian entrepreneurs who use this equipment to keep our communities safe and clean. This regulation of Small Off-Road Engines would effectively eliminate most of the pressure washing products and the services that we provide to our California customers which would impact our livelihoods as well as theirs. A pressure washer is used in order to quickly and effectively clean and sanitize in a way no other product can. It is a highly effective piece of equipment that is ideal for a drought susceptible climate since it uses a fraction of the water used by a garden hose. If gas powered pressure washers are not available, there is no current available battery or electric technology to take its place. The other option of cleaning that will be employed will be with a garden hose which will lead to less effective cleaning and significantly more water wasted or in some cases not cleaning at all. One unique application of pressure washers is by using hot water. A hot water pressure washer is an industrial piece of equipment that is the core of our business. It is similar to using hot water for cleaning your dishes rather than just cold water. It quickly removes grease, oil, algae, road film and other grime. It cleans much faster and in many applications completely eliminates the need to use chemicals. If this product is not available then the alternative may be to try to use caustic chemicals to perform the same function which will have a detrimental effect to our environment. Also, there are some applications like gum and graffiti removal where a gas powered hot water pressure washer is the absolute best tool for the job. A hot water pressure washer can remove a piece of gum from the concrete in the matter of seconds where there is no other product that can do this as quickly and effectively. By having gas power, you can effectively clean anywhere including remote areas such as agricultural and construction sites.

The state and local municipalities use pressure washers to keep our state beautiful and safe. Almost every downtown and historic district is cleaned with pressure washers at night after street fairs and market nights. Our amusement parks, stadiums, schools where our children play are cleaned with gas powered pressure washers. Train, subway and bus stations are all cleaned with pressure washers. Hot water pressure washers are employed to clean and sanitize homeless encampments and prevent to spread of deadly diseases. Our state uses pressure washers to kill zebra and quagga mussle larvae in boats to prevent the spread of Aquatic Invasive Species from the Colorado River into our other lakes and streams which would harm the natural eco systems. Hot water pressure washers are employed for disaster cleanup after floods, fires, and oil spills.

Many of the systems that we make, help contractors and municipalities comply with the Clean Water Act by employing onboard generators to power a Recovery and Recycle systems. This system not only picks up the wash water preventing any contaminated wastewater from entering our streams, lakes, and oceans; it also recycles the water for reuse conserving even more water which is one of our states most precious natural resources.

Battery and electric power are currently not an option. We produce commercial/ industrial products that are not capable of being run on the standard power grid. The battery technology currently available is not a feasible or affordable option for this application of industrial/ commercial cleaning.

I ask you to please reconsider your decisions and to make commercial and industrial pressure washing equipment preempt from this proposal due to its heavy use by agriculture and construction industries that depend on it, as well as the various other essential cleaning tasks that I have explained. There are many unseen benefits that these small engine powered products contribute to our every day lives and the quality of life in keeping our beautiful state clean and safe.

Thank you very much for your consideration,  
Casey Meelker

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 19:44:44

No Duplicates.

**Comment 554 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Regan

Last Name: Barry

Email Address: rbarry@coastalevergreen.com

Affiliation: California Landscape Contractors Assoc.

Subject: Amendments to the Small Off-Road Engine Regulations

Comment:

Although it is in all of our interests to do our part to replace the use of gas fueled landscape power equipment the timeline proposed to accomplish this is unrealistic for many reasons as follows:

\* We would need to install expensive charging equipment in our landscape yards.

\* All locations on our commercial accounts would need charging stations

\* The electric power equipment currently is not up to speed compared to our current equipment

\* The cost to replace our existing equipment within the proposed timeline would cost our company ten of thousands of dollars. We need more time

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 19:51:24

No Duplicates.

## **Comment 555 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: David  
Last Name: Wyett  
Email Address: dave@alwaysunderpressure.com  
Affiliation: Always Under Pressure

Subject: Response to California AB-1346  
Comment:

Always Under Pressure is a small business in the Bay Area selling and servicing commercial power washing equipment. A large portion of our business is 13 - 25 horsepower gas engines powering 3000 - 4000 psi hot water, high pressure machines.

Some of this equipment goes to school districts, hospitals, construction companies, food processing equipment and facilities and many types of transportation including buses, trains, and airplanes. Most cities, counties, and districts, for example Golden Gate Bridge and BART use this equipment.

We also service the mobile cleaner industry. Some of these companies have as many as four or five wash crews that go out every weeknight and some of them hire and train the homeless and disadvantaged. They mostly work at night and the general public never sees them and are unaware of the work they do. They wash buildings, city sidewalks including urine and feces area where the homeless are living They wash restaurant entries and walkways, garbage dumpster areas and many public spaces we all use.

While we understand the intent of reducing emissions, at this time there is no alternative equipment available to substitute for this type of cleaning.

The intent of this cleaning is to improve healthy living conditions and quality of life.

Check out these Bay Area news articles regarding the use of hot water pressure washers.

<https://nypost.com/2019/12/04/sf-neighborhood-will-pay-to-power-wash-feces-off-sidewalks/#:~:text=San%20Francisco's%20Tenderloin%20District%20kicked,animal%20feces%20littering%20the%20streets.>

<https://abc7news.com/kivia-oakland-ex-con-opportunities-for-ex-cons/4463428/>

<https://www.bizjournals.com/sanfrancisco/news/2021/07/14/sf-streets-business-cleanup-initiative-shine.html>

Please allow the continued use of this equipment until additional technology can be developed.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 20:49:48

No Duplicates.



## **Comment 556 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Anthony  
Last Name: DeRiggi  
Email Address: tderiggi@msn.com  
Affiliation:

Subject: I support sore2021 regulations  
Comment:

As a physician concerned about air quality, I support the adoption of new regulations that will phase out the sale of highly-polluting gas-powered leaf blowers and lawn equipment in California beginning in 2024.

In addition to the pollution caused by the engine exhaust, blowers can create clouds of industrial pollutants, pollens, fertilizers, herbicides and pesticides, dried animal feces, dust and demolition debris such as lead and asbestos - further polluting the air we breathe.

While these regulations do not prohibit the use of existing polluting equipment, they do propose prohibiting the production of new equipment to sell or lease for use in the State of California beginning in 2024. This is a modest but important step to advance greater use of cleaner, healthier and quieter equipment.

As your agency's own research has found, the use of gas-powered leaf blowers and lawn mowers in particular causes numerous health problems, greatly contributing to California's sad role as home to seven of the Top Ten most polluted cities in the nation. In fact, California risks losing future federal funding if we continue to fail to meet national air quality standards.

CARB's public health benefit analysis determined that these new regulations, if adopted, will result in:

- §8.8 billion in monetized health benefits through 2043
- 892 lives saved from premature deaths
- 438 fewer emergency room visits for asthma
- 311 fewer hospitalizations for respiratory and cardiovascular issues

The California Legislature has appropriated only \$30 million for your agency to distribute to small proprietor landscapers and help them begin to acquire and transition to new, zero emission electric and manual equipment. More funding will be needed. Funding also must be provided to support training programs to help landscapers switch to clean tools.

Please vote to approve and amend the SORE regulations per the staff recommendation.

Anthony DeRiggi, MD  
Sacramento, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 21:18:31

No Duplicates.

**Comment 557 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Ron  
Last Name: Askeland  
Email Address: ron.askeland@gmail.com  
Affiliation: SD-SEQUEL

Subject: Support for California's transition to clean lawn care equipment  
Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/com-attach/957-sore2021-AXJUPVYIBDILP1Nj.pdf'

Original File Name: SORE2021 comments.pdf

Date and Time Comment Was Submitted: 2021-11-29 21:52:32

No Duplicates.

**Comment 558 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Greg  
Last Name: Mitchell  
Email Address: gregmitchell@ecifuel systems.com  
Affiliation: ECI Fuel Systems

Subject: Comments on Proposed Amendments to SORE Regulations  
Comment:

Please see attached letter.

Sincerely,

Greg Mitchell  
ECI Fuel Systems  
909-732-5773 mobile

Attachment: 'www.arb.ca.gov/lists/com-attach/958-sore2021-UTQGY1A4UFwDYwN2.pdf'

Original File Name: ECI Fuel Systems comments on Amendments to SORE-Nov 29.pdf

Date and Time Comment Was Submitted: 2021-11-29 22:25:45

No Duplicates.

**Comment 559 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Gregg  
Last Name: Brodsky  
Email Address: gbrodsky@alkota.com  
Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Small Off-Road  
Engine Regu

Comment:

Proposed Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions With Phase in for  
Industrial/Commercial pressure washers.

Attachment: 'www.arb.ca.gov/lists/com-attach/959-sore2021-VyRXPlwvUWcDWIIx.pdf'

Original File Name: Sore Comment Notice of Public Hearing to Consider Proposed  
Letterhead.pdf

Date and Time Comment Was Submitted: 2021-11-29 22:47:15

No Duplicates.

**Comment 560 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Greg  
Last Name: Knott  
Email Address: gknott@opei.org  
Affiliation: Outdoor Power Equipment Institute

Subject: OPEI Comments to SORE2021 Rulemaking - Supplement to Comment 8  
Comment:

The Outdoor Power Equipment Institute (OPEI) respectfully submits the attached additional comments regarding the California Air Resources Board (CARBs) Proposed Amendments to the Small Off-Road Engine (SORE) Regulations: Transition to Zero Emissions ("the Proposed Rule"). The attached comments are a supplement to Comment 8 previously submitted.

Attachment: '[www.arb.ca.gov/lists/com-attach/960-sore2021-BWoBdwRgADoGXwBj.pdf](http://www.arb.ca.gov/lists/com-attach/960-sore2021-BWoBdwRgADoGXwBj.pdf)'

Original File Name: OPEI Comments to CARB SORE2020 Proposed Rules SUPPLEMENT TO COMMENT 8.pdf

Date and Time Comment Was Submitted: 2021-11-29 23:18:58

No Duplicates.

**Comment 561 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Jennin  
Last Name: Martinez  
Email Address: jay@jvmlandscapes.com  
Affiliation:

Subject: SORE Regulations  
Comment:

My name is Jay Martinez, owner of JVM Landscape Construction, Inc. in Sacramento, CA. We are a small business, with full-time employees, serving the greater Sacramento area. We primarily are a landscape design and build company, specializing in residential homes.

In reference concerning Proposed Amendments to the Small Off-Road Engine Regulations, Transition to Zero Emissions, Initial Statement of Reason (ISOR) (published October 12, 2021) I would like to humbly ask for your support, to support an amendment to the ISOR, delaying implementation of the transition to Zero Emissions Equipment for commercial/professional grade small off-road engines until model year 2028 or later. As a Small business owner, use of the small engines in questions are crucial to our operations.

This proposed ruling would hurt our staff, to perform essentially duties on the jobsite in a safe and effective manner. This ruling stands to hurt small business owners of color, and employees of color the most as it stands. I know this first hand as a practitioner, and a veteran of the landscape industry for several decades. The additional time would be much needed to allow professionals to further acclimate to an environment better suited and tailored to transition to all electric ZEE.

Thank you for your consideration. Feel free to reach out to me anytime for more information.

Jay Martinez  
President  
JVM Landscape Construction, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-11-29 23:32:38

No Duplicates.

**Comment 562 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 45 Day.**

First Name: Kim

Last Name: Alexander

Email Address: mowbetter01@gmail.com

Affiliation: Mow Better co-convener

Subject: Support for California's transition to clean lawn care equipment

Comment:

Please see attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/962-sore2021-AmQGd1EPVFgBdwRx.pdf](http://www.arb.ca.gov/lists/com-attach/962-sore2021-AmQGd1EPVFgBdwRx.pdf)'

Original File Name: FW\_ Public Comment on SORE regs.pdf

Date and Time Comment Was Submitted: 2021-12-03 13:19:15

No Duplicates.



**Comment 1 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Joani

Last Name: Woelfel

Email Address: joani@fweda.com

Affiliation: FAR WEST EQUIPMENT DEALERS ASS

Subject: SORE Comment

Comment:

Please see attached for comments.

Attachment: [www.arb.ca.gov/lists/com-attach/963-sore2021-AGMCZVwvAzIBWFUm.pdf](http://www.arb.ca.gov/lists/com-attach/963-sore2021-AGMCZVwvAzIBWFUm.pdf)

Original File Name: CARB SORE Rulemaking 12-9-2021.pdf

Date and Time Comment Was Submitted: 2021-12-09 08:01:37

No Duplicates.

**Comment 2 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association

Subject: California Health and Medical community support for SORE

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/964-sore2021-UztdPgFhAzxXJVA4.pdf](http://www.arb.ca.gov/lists/com-attach/964-sore2021-UztdPgFhAzxXJVA4.pdf)

Original File Name: Health Group SORE Sign-On Letter\_Final\_Updated 12.9.2021.pdf

Date and Time Comment Was Submitted: 2021-12-09 08:21:27

No Duplicates.

**Comment 3 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Roger  
Last Name: Taylor  
Email Address: rstaylormd@me.com  
Affiliation:

Subject: Opposition to Banning RV Generators  
Comment:

Generators in RVs are not often used, but critical when needed; and the available alternatives to address an RV's need for a generator are much less effective, use more fuel, and cause more pollution than using a generator.

In our 15 years of traveling with an RV, we've only used our generator 6 times, each time for an emergency where our health was at risk, be it when evacuating from the terrible smoke and fires in the SF Bay Area in 2020 (where my wife's compromised lungs needed continuous 110 powered air filtration and a nebulizer and thick clouds cut down our solar panel's ability to keep up), or during snap heat or cold spells while camping off-grid. We support clean air regulations, power our home and RVs with solar panels and back up batteries, and strive to be energy efficient. But there are times when generator power is absolutely necessary in our RV. We don't have a second home. Our RV is our second home on wheels. Why should that home be denied back-up generator power like all other homes?

Attached is our 2-page testimony which includes more detail on the above summary.

Thank You, Roger and Marian Taylor

Attachment: [www.arb.ca.gov/lists/com-attach/965-sore2021-AnYGb1cJWUAZIAP.docx](http://www.arb.ca.gov/lists/com-attach/965-sore2021-AnYGb1cJWUAZIAP.docx)

Original File Name: To CA Air Resources Board.docx

Date and Time Comment Was Submitted: 2021-12-09 08:39:03

No Duplicates.

**Comment 4 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Michael

Last Name: Ochs

Email Address: mochs@rvia.org

Affiliation: RV Industry Association

Subject: Slides for Board member meetings

Comment:

Please see attached. Comment uploaded by CoTB.

Attachment: [www.arb.ca.gov/lists/com-attach/966-sore2021-VCcCaFM7BzBVNIAj.pdf](http://www.arb.ca.gov/lists/com-attach/966-sore2021-VCcCaFM7BzBVNIAj.pdf)

Original File Name: slides for Board member mtgs 120721.pdf

Date and Time Comment Was Submitted: 2021-12-09 08:29:15

No Duplicates.

## **Comment 5 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Sandra

Last Name: Giarde

Email Address: sandragiarde@clca.org

Affiliation: California Landscape Contractors Assoc

Subject: Information provided by CLCA at the request of Dr. Pacheco-Werner

Comment:

See Attached (and/or below). Uploaded by CoTB

- Information on the constituent size of Contractors State License Board C-27 licensed landscape contractors

As of 4:00 p.m. today, California has 11,424 active licensed C-27 landscape contractors. There are other C-27 license holders who currently have their license in "inactive" status, meaning that they cannot currently contract at this time.

- Information on the constituent size of sole-proprietor gardeners and income estimates

According to the Bureau of Labor Statistics

(<https://www.bls.gov/oes/current/oes373011.htm>) the average income for a landscape worker is under \$40,000. The exact number of sole-proprietor gardeners, who are overwhelmingly latino, is harder to establish as they do not have to hold a C-27 license and many do not even have local business licenses. A recent article from CalMatters puts the estimated number of sole-proprietor gardeners at 60,000.

(<https://calmatters.org/california-divide/2021/11/a-50-coupon-for-one-tool-gardeners-call-californias-subsidy-inadequate/>)

- Calculation on funds needed if licensed landscape contractors and sole-proprietor gardeners were to have ZEE transition funding under the San Joaquin Valley Air District funding model

As we discussed, if the San Joaquin Valley Air District's commercial Clean Green Yard Machines funding limits (\$25,000 per applicant) were applied to the C-27 landscape contractors and unlicensed sole-proprietor gardeners that would necessitate \$1,785,600,000.00 in assistance funds.

(<https://www.valleyair.org/grants/cgym-commercial.htm>)

Attachment: [www.arb.ca.gov/lists/com-attach/968-sore2021-VD1UPANkAj5RCAZ2.pdf](http://www.arb.ca.gov/lists/com-attach/968-sore2021-VD1UPANkAj5RCAZ2.pdf)

Original File Name: info\_provided\_by CLCA\_per\_CoTB\_email.pdf

Date and Time Comment Was Submitted: 2021-12-09 09:10:04

No Duplicates.



## **Comment 6 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Muriel  
Last Name: Strand  
Email Address: ecoengr@comcast.net  
Affiliation:

Subject: how to ban leafblowers - we need conversations  
Comment:

For several years I have tabled at the Sunday morning farmers market in Sacramento under the freeway near Southside Park, advocating banning leafblowers, especially gas-powered blowers.

I have encountered both resistance and support. The first Sunday I ever tabled about this, a guy came up to me and announced that he owned the biggest lawn care company in Sacramento, and that what I was proposing would never work.

He proceeded to tell me a story about a client, a lawyer who one day while working on a brief was rudely interrupted by a gas-powered leafblower. The lawyer called the company and said, "Get rid of the damn leafblower."

Okay.

A month went by and the lawyer's wife got the bill, and called the company saying, "Use the damn leafblower."

Then Mr. Landscaper Company said to me "See! It will never work!"

And I said, "What I am seeing is that nobody sat down and had a conversation about what they wanted, what they were willing to pay, and what they were willing to do."

Oh.

And I see that such conversations are still not happening. We are overdue....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 09:14:20

No Duplicates.

**Comment 7 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Scott  
Last Name: Bolsins  
Email Address: bolsins3048@gmail.com  
Affiliation:

Subject: Mobile Power Generation Safety Concerns  
Comment:

SORE considerations

On board power generation provides power for air conditioners in the event of a power disruption for pets left in RV's. Batteries will not supply the power required to run an air conditioner. A vehicles temperature can rise fairly quickly and a pet left in a recreational vehicle that loses utility power would be at a great risk. Have you considered the risk of a power loss to life safety equipment used by elderly or at risk travelers in a RV. Additionally, on board power generation is used in first responder vehicles.

I am familiar with a MRI mobile treatment vehicle that has saved stroke victims and would not be operable without a mobile generator.

These are not 'portable generators' and I disagree with any ban of mobile generators for 2022.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 09:09:38

No Duplicates.



**Comment 8 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: R. Calvin  
Last Name: Rasmussen  
Email Address: calvinr@buyroyce.com  
Affiliation: Royce Industries L.C.

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

Comment:

Please see my comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/971-sore2021-Wi1WIIQ8V3BVJwJn.pdf](http://www.arb.ca.gov/lists/com-attach/971-sore2021-Wi1WIIQ8V3BVJwJn.pdf)

Original File Name: Written Comments - CARB-SORE - R Calvin Rasmussen.pdf

Date and Time Comment Was Submitted: 2021-12-09 10:09:53

No Duplicates.

**Comment 9 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Dan

Last Name: Pearson

Email Address: Dan.Pearson@karcherna.com

Affiliation: Karcher

Subject: 21-13-2: Public Hearing to Consider Proposed Amendments

Comment:

Please see attached file

Attachment: [www.arb.ca.gov/lists/com-attach/972-sore2021-ViYAc1MwUG8FalU2.docx](http://www.arb.ca.gov/lists/com-attach/972-sore2021-ViYAc1MwUG8FalU2.docx)

Original File Name: Public hearing comment.docx

Date and Time Comment Was Submitted: 2021-12-09 10:17:00

No Duplicates.

**Comment 10 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: molly

Last Name: munz

Email Address: molly.munz@gmail.com

Affiliation:

Subject: support ZEE for safe breathing spaces

Comment:

My family purchased a battery electric leaf blower and lawnmower over 10 years ago. We prefer ZEE to SORE for many reasons; they are quieter, cleaner, safer and more convenient. The smell and toxic fumes we are forced to breathe when SORE is operated in and around my family is unavoidable and unfair. My family (including my autistic son) does not obtain any financial benefit from the operation of SORE--only harm.

My neighbors pay only \$25 a month for a "mow and blow" crew. This seems way to cheap; I think they could pay more. Additionally, I can't imagine how landscape crew members must feel after breathing SORE toxic fumes day-in and day-out. This is a serious environmental justice issue! We are sincerely hoping this transition happens faster than designed. You have my support!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 10:24:11

No Duplicates.

**Comment 11 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Patricia

Last Name: Hanz

Email Address: phanz@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: Oral Statement of the Truck & Engine Manufacturers Association

Comment:

The Truck & Engine Manufacturers Association hereby submits its written statement, presented orally earlier today, regarding the Board's Proposed Amendments to the Small Off-Road Engine Regulations.

Attachment: [www.arb.ca.gov/lists/com-attach/974-sore2021-VjUHYAfyWWgBWAzy.pdf](http://www.arb.ca.gov/lists/com-attach/974-sore2021-VjUHYAfyWWgBWAzy.pdf)

Original File Name: CARB Testimony on Proposed Amendments to the SORE Regulations(126496.1).pdf

Date and Time Comment Was Submitted: 2021-12-09 10:58:44

No Duplicates.

**Comment 12 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Kim  
Last Name: Alexander  
Email Address: kimalex@calvoter.org  
Affiliation: Mow Better

Subject: SORE 2021  
Comment:

See Attached. Uploaded by CoTB.

Attachment: [www.arb.ca.gov/lists/com-attach/976-sore2021-VSZTOIUmBzEDWIJg.pdf](http://www.arb.ca.gov/lists/com-attach/976-sore2021-VSZTOIUmBzEDWIJg.pdf)

Original File Name: SORE 2021.pdf

Date and Time Comment Was Submitted: 2021-12-09 11:25:32

No Duplicates.

**Comment 13 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021). (At Hearing)**

First Name: Alan  
Last Name: Metzger  
Email Address: alanm@walker.com  
Affiliation: Walker Distributing Company

Subject: ZEE Limitations on Large Zero-Turn Mowers  
Comment:

I am the GM of distribution for Walker Distributing, based in Colorado. I wanted to point out one of the current limitations of batteries for large equipment - specifically the duty cycle requirements for landscapers using zero-turn mowers.

The typical all-electric ZT mower today (see the Greenworks GZ series) will offer about 1.75 hours of use at full speed, and then they will require as much as 12 hours to recharge. The battery is so large that it does not allow user replacement on the fly. This simple configuration yields a predicted duty cycle of 1.75 / 13.75 = 12.7%. That is, a landscaper could use this mower for less than two hours and then would have to park it for up to 12 hours before using it again. To work straight through an 8-hour day, a landscaper would have to purchase five of these mowers. That is an unusually large burden on the typical landscaper.

Battery equipment that can be easily changed on the fly - like modular batteries for chain saws, trimmers, etc - is ready for the new policy. But for certain types of equipment, such as large items (like zero-turn mowers), the viable technology is still many years away. I ask that you consider exempting zero-turn mowers 17 horsepower and above from the regulations under AB 1346.

Thank you for your consideration.

Alan Metzger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 12:24:45

No Duplicates.

**Comment 1 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Tom  
Last Name: Kunhardt  
Email Address: tt101@mac.com  
Affiliation:

Subject: Clean air  
Comment:

<p>Please enact policy that supports clean air!</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-30 21:41:05

No Duplicates.

## **Comment 2 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Ray

Last Name: Gilstrap

Email Address: AllproEngine@gmail.com

Affiliation: Allpro Engine & Mower Supply

Subject: CARB putting small business's out of business !

Comment:

<p>I have had enough of the Socialists and Liberals taking away are state government. Newsome and CARB need to go away permanatly. I hope someone files a Lawsuit against CARB & Newsome for unfair restraints on our business. Any other State entity that feels they have full control over peoples business and livelyhood should be shut down so all the employees have a feeling for what all of us small OPE businesses will feel like if you go ahead with this farse. 100 miles away in Mexico they are still burning old tires and used oil for heat so what is this really going to do other than hurt many of us small OPE dealers.&nbsp;</p>

<p>The Declaration of Independence calls for the people to take back their government when they lose faith sand trust in them, thats already happened not long ago with the run on the Capitol, how long before it happens again ?</p>

<p>UNFAIR, SOCIALIST MENTALITY</p>

<p>I am very disappointed and angry with State Government and the foolishness that they feel does good. This is not good.</p>

<p>Unhappy Californian,</p>

<p>Ray Gilstrap</p>

<p>(951) 286-0093</p>

<p>O.P.E. Outdoor Power Equipment</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-31 11:37:10

No Duplicates.



**Comment 3 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Trung

Last Name: Pham

Email Address: Info@singlecylinderstore.com

Affiliation:

Subject: Gas powered ban

Comment:

<p>Dear CARB</p>

<p>I am Trung Pham, owner of Single Cylinder Repair, Inc. I have been doing business as outdoor power equipment sale and repair for more than 23 years. I build my company out of sweat, dedication of hard work. The California has gone too extreme by banning all gas powered equipment. We need equipment to keep our garden, lots, parks and forest clean and prevent fire each year. I am not against technology but we are not getting there yet. The California decision has been driving businesses out from California. Even though California goes zero emission, China, India and other countries freely use coals and petroleum products and it will make no difference. I agree wholeheartedly that we need to protect the environment and keep our planet a place can be enjoyable for everyone but banning all the gas powered equipment is too extreme&nbsp;</p>

<p>Thank you&nbsp;</p>

<p>&nbsp;</p>

<p>Trung Pham</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-01 23:07:49

No Duplicates.

**Comment 4 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: MOSTAFA

Last Name: YUSUF

Email Address: MOSTAFA.YUSUF@POOLCORP.COM

Affiliation: LANDSCAPE PRODUCT DISTRIBUTOR

Subject: ZERO EMISSION

Comment:

<p>I am totally against this amendment.&nbsp; Puts the small guy out of business especially the mow and blow guys.&nbsp; Mowers and small hand equipment's prices are going to be totally over-board.&nbsp; We need to wait until manufactureres have a better replacement in place as far as battery operated hand-held equipment.&nbsp; At this time...we dont.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-04 13:11:46

No Duplicates.

**Comment 5 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: MARVIN  
Last Name: Gamboa  
Email Address: marvin@powermower.com  
Affiliation:

Subject: NOT AGREED  
Comment:

<p>I WOULD LIKE TO KNOW, WHAT THE GOVERNMENT ARE GOING TO DO??</p>  
<p>PER EXAMPLE WITH FIRE DEPARTMENT, POLICE DEPARTMENT, MARINES AND  
MORE, THAT WILL BE (A MUST) OF NEEDING THE TWO AND FOUR CYCLE  
EQUIPMENT!&nbsp; BATTERY AND ELECTRICAL EQUIPMENT CAN'T NOT BE  
USEFUL IN MOST CASES!!</p>  
<p>&nbsp;</p>  
<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-13 08:55:45

No Duplicates.

## **Comment 6 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Shari  
Last Name: Rodrigues  
Email Address: FURBERSAW@AOL.COM  
Affiliation: Furber Saw, Inc.

Subject: Proposed Changes for engines in discussion  
Comment:

<p>There are so many issues the way the ban of gas engines in discussion is being implemented.&nbsp; The OPE dealers in CA have been left out of the process.&nbsp;<strong> I invite our Bay Area Board Member to visit our store, please</strong>. All board members please visit a store near you.&nbsp; We welcome you.&nbsp; We have more knowledge and direct access to the affected Commercial Landscaper whether big or small all day long. That is our customer, we are not a Big Box Store.&nbsp; Staff have not given the Board the full picture with industry knowledge.&nbsp; <strong>For example the battery manufactured unit they are using for Commercial Mower comparison</strong> <strong>for pricing is NOT the unit the end user in California will be buying.</strong>&nbsp; We are now so low on inventory going into our high season for weed abatement and wild fire defense season which is March-July.&nbsp; All dealers in CA have a wait list for equipment, we received a call from So Cal looking for a specific model just yesterday.&nbsp; This leaves CA in a dire situation whether we are experiencing a drought or raining season.&nbsp; Supply will not be there with battery units when this time comes in 2024, I am very confident in that.&nbsp; Please start with residential rated units.&nbsp; This user can go to the Big Box Store and purchase an inexpensive throw away battery unit that will last a few years.&nbsp; Ease us into this regulation, give us a chance to change our business plan. Then implement one type of unit at a time for the commercial industry.&nbsp; &nbsp;It involves more than you realize.&nbsp; This gives us a chance to give feedback to manufactures on performance and changes needed per unit on this new product.&nbsp; We've had engineers from Japan out regarding gas units so they can see why the unit is not holding up under use and to make changes needed.&nbsp; We will need this process for the Commercial Industry.&nbsp; There is also a Tech. Service Department at each store that will be effected.&nbsp; Thank you for your consideration.&nbsp;&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-13 08:24:00

No Duplicates.



**Comment 7 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Mitch  
Last Name: Domingos  
Email Address: mitchd40@yahoo.com  
Affiliation:

Subject: Reconsider  
Comment:

<p><span style="font-family: 'Segoe UI',sans-serif;">Hello  
CARB,</span></p>  
<p><span style="font-size: 11.0pt; font-family: 'Segoe  
UI',sans-serif; mso-fareast-font-family: DengXian;  
mso-fareast-theme-font: minor-fareast; mso-ansi-language: EN-US;  
mso-fareast-language: ZH-CN; mso-bidi-language: AR-SA;">The  
approach to ban SORE by 2024 is very aggressive, for industries and  
a public who is not prepared. &nbsp;The process will happen  
organically in time as the technology improves and costs reduce.  
&nbsp;By removing emission credits in CA, engines above &nbsp;  
CARB's emission standard would no longer be allowed. &nbsp;This  
would reduce emissions while still giving the public clean  
equipment while manufactures continue to develop ZEE. &nbsp;The  
current supply chain has delayed the availability to develop ZEE  
products. &nbsp;The current timeline is unobtainable for  
manufacturers to develop ZEE by 2024 and current ZEE products will  
not meet demand due supply chain issues. &nbsp;We ask CARB to take  
gradual steps toward ZEE over 10 years.</span></p>  
<p>Thank You,</p>  
<p>&nbsp;</p>  
<p>Mitch Domingos</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 05:43:17

No Duplicates.



## **Comment 9 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Dennis

Last Name: Hendrix

Email Address: hendrixsaw@yahoo.com

Affiliation:

Subject: Response to proposed Small Off-Road Engine Regulations

Comment:

<p>As a lawn and garden business owner and home owner in the city of Santa Rosa, CA I can tell you first hand of the implications that the laws you propose will have on fire danger and the countless people that may die in the next major fire from the decisions you will make.&nbsp; I have seen the devastation that a massive wildfire causes.&nbsp; I have had countless customers in my store crying as they think of the homes or family members that they lost due to fire.&nbsp; I do not oppose transitioning to cleaner outdoor power equipment but as a business owner I know that supply chain issues will guarentee that we will not have sufficient "green" equipment prior to Jan 1, 2024.&nbsp; Given the current global position I beg you to postpone implementation until supply chain issues subside.&nbsp; We live in an area with large open fields, acres and acres of trees and dry underbrush, a lack of water and no current battery powered solution to combat these conditions.&nbsp; Please consider that we don't all live in cities with concrete and asphalt surrounding us.&nbsp; If we can't properly maintain our open spaces then you the board may have to live with the lives lost based on your decision.&nbsp; Please understand that I want a clean environment for my children and I support a transition, I just know that during a global pandemic these goals are not realistic.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 10:02:06

No Duplicates.



**Comment 10 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Greg

Last Name: Knott

Email Address: gknott@opei.org

Affiliation: Outdoor Power Equipment Institute

Subject: OPEI Comments to CARB SORE2021 Rule - 15-day Changes

Comment:

<p>The Outdoor Power Equipment Institute respectfully submits the attached comments to the Notice of Public Availability of Modified Text and Availability of Additional Documents Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions.</p>

Attachment: [www.arb.ca.gov/lists/com-attach/989-sore2021-UT5SJANnVmxVDFQ3.pdf](http://www.arb.ca.gov/lists/com-attach/989-sore2021-UT5SJANnVmxVDFQ3.pdf)

Original File Name: OPEI Comments to CARB SORE2020 Proposed Rules 15Day Changes FINAL 220414.pdf

Date and Time Comment Was Submitted: 2022-04-14 12:00:09

No Duplicates.

**Comment 11 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Robert  
Last Name: Olma  
Email Address: robert.olma@stihl.de  
Affiliation:

Subject: Comments by ANDREAS STIHL AG & Co. KG to CARB's proposed SORE amendments

Comment:

```
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span lang="DE" style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1;">Dear Sir or Madam,</span></p>
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span lang="DE" style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1;">&nbsp;</span></p>
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1; mso-ansi-language: EN-US;">please find enclosed comments by <span style="mso-no-proof: yes;">ANDREAS STIHL AG & Co. KG to CARBs proposed </span>Amendments to the Small Off-Road Engine Regulations.</span></p>
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1; mso-ansi-language: EN-US;">We would higly appreciate if CARB considered them.</span></p>
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1; mso-ansi-language: EN-US;">&nbsp;</span></p>
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1; mso-ansi-language: EN-US;">Sincerely yours,</span></p>
<p class="MsoNormal" style="text-align: justify; line-height: 1;"><span style="font-family: 'Arial',sans-serif; color: black; mso-themecolor: text1; mso-ansi-language: EN-US;">Robert Olma</span></p>
```

Attachment: [www.arb.ca.gov/lists/com-attach/990-sore2021-BXYGdFU9U2hXPVcI.pdf](http://www.arb.ca.gov/lists/com-attach/990-sore2021-BXYGdFU9U2hXPVcI.pdf)

Original File Name: STIHL\_15-day Comments\_to\_CARB\_2022\_04\_14.pdf

Date and Time Comment Was Submitted: 2022-04-14 12:40:28

No Duplicates.



**Comment 13 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Patricia

Last Name: Hanz

Email Address: avujovic@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: 2022 04 14 EMA Comments CARB 15 Day Notice Proposed SORE Amendments  
Comment:

<p>Please see the attached comments submitted by the Truck and  
Engine Manufacturers Association.</p>

Attachment: [www.arb.ca.gov/lists/com-attach/992-sore2021-W2lda1NgUjMKUwMz.pdf](http://www.arb.ca.gov/lists/com-attach/992-sore2021-W2lda1NgUjMKUwMz.pdf)

Original File Name: 2022 04 14 EMA Comments CARB 15 Day Notice Proposed SORE  
Amendments(127910.1).pdf

Date and Time Comment Was Submitted: 2022-04-14 13:49:56

No Duplicates.

## **Comment 14 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Todd

Last Name: Baker

Email Address: bakersuppliesandrepairs@yahoo.com

Affiliation:

Subject: AB 1346

Comment:

<p><span style="font-size: 13.5pt; font-family: 'Segoe UI', sans-serif;">Hello,&nbsp;</span></p>  
<p><span style="font-size: 13.5pt; font-family: 'Segoe UI', sans-serif;">I am writing today as a small business owner in opposition to AB1346.&nbsp;</span></p>  
<p><span style="font-size: 13.5pt; font-family: 'Segoe UI', sans-serif;">We are 29 years established in the lawn and garden business and currently have 3 locations servicing all over CA. We are a full service shop and carry many brands of equipment servicing homeowners, landscapers and many government municipals and cemeteries. We currently sell gas and electric branded equipment. With the ban on these gas powered equipment we feel that our technology is not ready for this to come to a head in 2024. We will see an increase in unemployment due to some customers saying they will not make the change as needed, along with the consumers who are willing to make the change but not having the funds to do so. There will be more overhead all together; customers will need multiple batteries, reconfiguration of electrical outlets to withstand charging multiple batteries, solar panels being needed in some cases. There will be a need for greater and more extensive training for mechanics and consumers to learn this new expansion. All units with intergrated batteries are viewed as disposable and unrepairable and in turn will create more waste in our landfills. More waste means more emissions in other ways. Where is it going to stop? We strongly need to reconsider this ban and think about other impacts this will have on the economy. We are putting out one fire to end up with many more. We deeply care for the environment and going green, but again making this transition happen in less than two years is not enough time to get customers or ourselves ready.&nbsp;</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 18:18:16

No Duplicates.

**Comment 15 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Tammy

Last Name: Stafford

Email Address: tstafford@harborfreight.com

Affiliation:

Subject: Harbor Freight Tools Comments to CARB SORE 2nd 15-Day Notice

Comment:

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 20:03:18

No Duplicates.

**Comment 16 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Jimmy

Last Name: Welch

Email Address: info@ceta.org

Affiliation: Cleaning Equipment Trade Association

Subject: Cleaning Equipment Trade Association Comment to CARB SORE Rule - 15-day  
Changes

Comment:

<p>The Cleaning Equipment Trade Association respectfully submits  
the attached comment to the Notice of Public Availability of  
Modified Text and Availability of Additional Documents Proposed  
Amendments to the Small Off-Road Engine Regulations: Transition to  
Zero Emissions.</p>

Attachment: [www.arb.ca.gov/lists/com-attach/996-sore2021-BWZXNFYjVWdVDFU2.pdf](http://www.arb.ca.gov/lists/com-attach/996-sore2021-BWZXNFYjVWdVDFU2.pdf)

Original File Name: CETA CARB SORE Comments 04142022.pdf

Date and Time Comment Was Submitted: 2022-04-14 20:25:28

No Duplicates.

## **Comment 17 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Garrett  
Last Name: McCall  
Email Address: garrett@mmlinc.net  
Affiliation:

Subject: Inappropriate Implementation Timeline  
Comment:

<p>To Whom It May Concern,</p>  
<p>From a seasoned landscaper's perspective;</p>  
<p>Overlooking the fact that the current technological status of battery operated landscape equipment is not yet satisfactory (to say the least), and is most definitely incomparable to the far superior gas powered equipment, the implementation timeline that is currently set is most definitely inappropriate. Here are a few reasons why;</p>  
<p>\* The massive demand for battery powered equipment that will be caused by this legislation will tax an already stressed supply chain network that will leave tradesmen without the necessary equipment that we need to get the job done.&nbsp;</p>  
<p>\* Heavy labor demand and limited supply have left our industry (and many others) in need of hard working men and women. Reducing efficiency during a time of labor shortages will only increase the demand for labor when there is already a problem with job vacancies.&nbsp;</p>  
<p>\* in an already unprecedented time of large-scale inflation, why does it make sense to rapidly force feed legislation that decreases efficiency and therefore heavily raises cost for goods and services to the residents of California?</p>  
<p>\* There is also the concern of the amount of infrastructure & training that will need to be upgraded in order to accommodate the storage, charging, and maintenance of the alternative equipment. This takes time to do.</p>  
<p>In summary, professionals in the landscape industry strive to do the right thing and we certainly understand that carbon emissions need to be reduced, but the alternative technology's are not yet there to substitute out the high quality gas equipment. The industry needs a much more extended timeline in order to execute this without failures that will be felt state wide, by ALL.&nbsp;</p>  
<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 22:02:47

No Duplicates.





## **Comment 18 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.**

First Name: Niki

Last Name: Nielsen

Email Address: niki.m.r.nielsen@gmail.com

Affiliation:

Subject: please reconsider timeframe

Comment:

<p class="MsoNormal" style="margin: 0in 0in 8pt; line-height: 15.6933px; font-size: 11pt; font-family: Calibri, sans-serif;"><span style="font-size: 14pt; line-height: 19.9733px;">The industry from Manufactures to End Users are not ready for this drastic deadline.&nbsp; In the Bay Area most of the employees who work for a Commercial Landscape Company 5 days a week, work for themselves on the weekend.&nbsp; We are not going to be able to pass on the cost of battery equipment estimated at a realistic 300% increase to our customers.&nbsp; The subsidies are not going to be there forever.&nbsp; In the end a maintenance worker will lose their weekend job to homeowners who will decide to maintain their property on their own.&nbsp; Which happens in every economic downturn, which is looming around the corner.&nbsp; I'd like to know how the electric grid is going to be able to store enough energy to power all the batteries from this equipment to cars, when last I knew California <strong>pays</strong> Arizona to take the solar energy it cannot store on the current grid. Not to mention what will happen with the abundance of dead batteries from all this equipment. &nbsp;The state should maintain some sort of balance of gas, electric and battery equipment.&nbsp; Not excluding gas altogether.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 23:21:49

No Duplicates.

## Comment 19 for Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (sore2021) - 15-2.

First Name: Erik  
Last Name: Vaillancourt  
Email Address: obierik@gmail.com  
Affiliation:

Subject: Rethink Transition  
Comment:

`<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">The state of California holds the fate of thousands of small businesses in the palm of their hands with this zero emission plan. Business owners rely heavily on the sale, repair and use of small engine equipment. This state cares deeply about pollution, which is abhorable, however the idea of a drastic zero emission plan on small engine equipment across the state is irresponsible. By doing so, it will crush retail and repair shops and small landscape businesses and affect the way cities, counties and the state will continue to tend to our parks and national forests. Have you considered how the ever growing wildfires in California will be fought against with a measly battery powered unit? Impossible.&nbsp;  </span><span id="docs-internal-guid-24da2695-7fff-e98d-3122-cb106e14ab04"></span></p><p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;  </p><p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">With the livelihoods of so many individuals and families at stake please, please think through your decision and consider those who will be forced to close their business. I beg you to ease into the zero emission future and consider all aspects. Please agree upon a transition that is appropriate and accommodating to all those involved.</span></p>`

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-14 23:47:04

No Duplicates.

**Comment 1 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-3.**

First Name: Kristopher  
Last Name: Wyrick  
Email Address: bigorsmallwefixitall@hotmail.com  
Affiliation:

Subject: amendments to sore 2021  
Comment:

<p>This is a crazy idea and the timeline to achieve this is not possible for the average business owner/operator. Small business and repair shops are going to be put out of business because they cant absorb the cost of replacing all the equipment with battery operated. Can California afford to lose more businesses? I just priced a battery operated STIHL weedeater and it was 100.00 more expensive than the gas version and it DID NOT include the charger or the batteries. I'm also curious how are we going to go about recycling lithium batteries that are going to go bad? They are extremely toxic and at this point we do not have a way to recycle them, do we just ignore the fact that most of the raw material for these batteries come from third world countries that are just being plundered for their rare earth elements. California has a hard enough time keeping the lights on and now you are suggesting we push everything towards zero emmission, how is this even feasibly possible? California is a dying state and this is only going to drive more people to leave because these laws are just insane. They make zero sense when it comes to the regular working class trying to make a living in a state thats already incredibly hard to live in if you dont make 150,000 plus a year.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-27 16:04:24

No Duplicates.

**Comment 2 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-3.**

First Name: Ellen  
Last Name: Vaughan  
Email Address: ellenbamma@hotmail.com  
Affiliation:

Subject: Support for banning of SOREs  
Comment:

<p>Hello,</p>  
<p>Please regulate SOREs, there's no need for gas anymore! Save  
emissions and money while getting the job done.</p>  
<p>Go electric!</p>  
<p>Thanks,</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 08:44:29

No Duplicates.



**Comment 4 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-3.**

First Name: Molly

Last Name: Analla

Email Address: MollyA.Volunteer@gmail.com

Affiliation:

Subject: Banning small engines hurts the "little guys!"

Comment:

<p>Banning small engines by 2035 is a dumb, dangerous proposition! We have had the big Creek Fire where people use gas powered generators for power; the elderly used them for the oxygen they rely on to keep them alive. I told our neighbor's gardeners that you wanted to ban their mowers and yard equipment. They said that's dumb because the electric ones are not very powerful, plus you have to deal with the cords. It will cost them more money to replace all of their equipment. Can't wait until they wake up to how destructive this progressive ideaology can be to their way of life!&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-08 07:36:34

No Duplicates.





**Comment 6 for Amendments to the Small Off-Road Engine Regulations:  
Transition to Zero Emissions (sore2021) - 15-3.**

First Name: Patricia

Last Name: Hanz

Email Address: avujovic@emamail.org

Affiliation:

Subject: EMA Comments - Corrected Version

Comment:

<p><span style="font-size: 11.0pt; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">Attached is a corrected version of comments filed by EMA to the Third Public Notice of Availability of Information related to the Proposed Amendments to the SORE Regulations &ndash; Transition to Zero Emissions.&nbsp; Please remove the comments that were submitted prior to these. Thanks.</span></p>

Attachment: [www.arb.ca.gov/lists/com-attach/1007-sore2021-BTcHVMVdkUTABWAMz.pdf](http://www.arb.ca.gov/lists/com-attach/1007-sore2021-BTcHVMVdkUTABWAMz.pdf)

Original File Name: 2022 06 13 EMA Comments on Third CARB 15 Day Notice Proposed SORE Amendments.pdf

Date and Time Comment Was Submitted: 2022-06-13 14:02:27

No Duplicates.