



June 15, 2023

OAR Docket

U.S. Environmental Protection Agency Docket Center

EPA Docket Center, OAR, Docket EPA–HQ–OAR–2023–0151, Mail Code 28221T

1200 Pennsylvania Avenue NW

Washington, DC 20460

RE: Docket No. EPA–HQ–OAR–2023– 0151: California State Nonroad Engine Pollution Control Standards; Small Off-Road Engines; Requests for Authorization. May 23, 2023

Dear Mr. Dickinson,

GCSAA is the professional association for the men and women who manage and maintain the game’s most valuable resource — the golf course. The golf industry recognizes the association as a key contributor in elevating the game and business. Since 1926, with a focus on golf course management, GCSAA has been the top professional association in the United States and worldwide. Headquartered in Lawrence, Kan., it provides education, information, and representation to more than 19,000 members in more than 72 countries. Its mission is to serve its members, advance their profession, and improve communities through the enjoyment, growth, and vitality of the game of golf.

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Please accept the below comments on proposed Amendments to the California Air Resources Board (CARB) Small Off-Road Engine regulations (SORE regulations) pursuant to section 209(e) of the Clean Air Act.

The California golf industry is an end user of many products that will be affected by the proposed amendments to CARB’s SORE regulations and the accompanying waiver approval from the EPA. Some of the products used on golf courses that may be impacted include, but are not limited to, chainsaws (<45cc), handheld grass and hedge trimmers, handheld and backpack leaf blowers, handheld pole pruners, handheld and ground supported edger’s, walk behind and riding greens mowers, select fairway mowers, hover mowers, verti-cutting and aerator units, snow blowers, trenchers, and at a later date, pressure washers and generators.

GCSAA appreciates CARB’s efforts to develop a strategy that lowers on-site emissions and reduces pollution and noise, while not immediately banning the use of certain equipment types. As commercial operators in the green industry who, every day, rely on numerous different equipment types, we anticipate continued adoption of various lines of zero emission equipment (ZEE) as its technology and capability improves. In fact, many golf course superintendents have already experienced the benefits that some ZEE offer, such as lower maintenance costs, decibel level reductions, reduced fuel costs, avoidance of fuel spills and leaks, and other potential environmental impacts.

However, we are concerned that the current inability to mass produce ZEE that meets commercial use standards by January 1, 2024, will hinder the ability of golf course superintendents to carry out maintenance operations that meet the expectations of end users and customers in California.

While some pieces of ZEE may currently meet commercial needs, numerous others do not and will require considerable additional technological improvements to satisfy the “fit for intended use” standard. Challenges posed by ZEE currently available to commercial operators include: charging



infrastructure cost; performance issues including durability and shelf-life deficiencies; range limitations and limited battery life; lengthy charging times that are insufficient for commercial operations which often require quick turnaround times; lack of maintenance support; and the general inability to complete large golf course maintenance and landscape tasks using ZEE alone.

Additionally, golf course superintendents commonly rely on numerous pieces of specialty equipment for which we have specific and immediate concerns, including: aerification equipment (Toro 648, John Deere Aercore 800); bunker rakes (John Deere 1200 bunker rakes, Toro Sand Pro Series); walk-behind and riding greens mowers; small spray units (Toro 1750); hover mowers, turf vacuums, and trenching units. Some of these equipment types do not currently have any zero emission alternatives, or have very few viable models available for commercial use.

The acquisition of ZEE will be of higher initial expense and a barrier to some end users, although cost savings may be realized over time. The rebate programs established by CARB do not include golf courses and some other large landscape users. Only small businesses or sole proprietors who provide professional landscape services are eligible for the Clean Off-Road Equipment (CORE) pro landscaping funds, which is an unfortunate example of the state of California establishing favored and disfavored industries and picking winners and losers via regulation.

In closing, we recognize CARB's desire to transition use of power equipment and small off-road engines away from internal combustion engines and towards ZEE, and this may be appropriate and technologically feasible for *residential purposes* by the established implementation date of January 1, 2024. However, as highlighted in our comments, GCSAA has significant concerns regarding impacts to *commercial operators*, specifically regarding some pieces of specialty equipment, such as, but not limited to, aerification units commonly used on golf courses. Due to these concerns, we request that as a condition for EPA approval of CARB's requested amendments to its SORE regulations, or through other appropriate means, an extension of the implementation deadline be granted to a date beyond January 1, 2024 for zero emission "commercial/professional grade" equipment. Based on Alternative 2 in CARB's Initial Statement of Reasoning (ISOR) document released Oct. 12, 2021, granting this request would still allow the state to meet its targeted 2016 SIP Strategy emission reduction goals for SORE while allowing manufacturers and end users in the golf, landscape, and other similar green industries time to develop, adopt and transition to zero emission equipment suitable for commercial purposes.

We appreciate your consideration of our request and the opportunity to submit these comments.

Sincerely,

Jeff Jensen

Jeff Jensen
Southwest Field Staff Representative (Arizona, California, Hawaii, Nevada)
Golf Course Superintendents Association of America