CARB Small Off-Road Engine Regulations: Transition to Zero Emissions Equipment

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Landscape professionals are stewards of the environment. Our members work every day to create and manage green spaces that positively impact climate change by sequestering carbon, producing oxygen, filtering stormwater, and providing significant energy savings.

The landscape industry is adopting new technology at a rapid rate. From smart controllers for irrigation systems that monitor the weather via satellite to conserve water; to drones that inspect the health of trees and landscapes; to equipment that monitors soil health; to route optimization software; to battery-powered equipment; and solar panels on trucks – many industry companies are testing and adopting new technologies to improve efficiency and reduce the industry's carbon footprint.

We share Governor Newsom and other California policymakers' intent to reduce carbon emissions from gas-powered landscape equipment as quickly as possible. Still, we must do so in a responsible manner that mitigates the negative financial impact on the 99% of small businesses that make up the more than 50,000 landscape companies in the state of California.

The timeline laid out in the proposed regulation – 2024 – a short two years away to end the sale of gas-powered Small Off-Road Engines (SORE) is extremely aggressive. SORE includes virtually all equipment used by landscape professionals (push and riding mowers, edgers, blowers, trimmers, snow blowers, chain saws, power washers, and portable generators). The proposed timeline doesn't allow for the technology to advance to meet the needs of commercial landscapers and would be prohibitively expensive for most businesses, especially smaller businesses.

Transitioning to zero-emission equipment, as outlined in the California law, requires a significant upfront investment. While we greatly appreciate the $30 million allocated to this program by the California legislature, it is, unfortunately, woefully inadequate. There are approximately 2 million gas-powered SORE currently in use in the professional industry, equaling a rebate of only $15 per piece of equipment compared to the hundreds to thousands of dollars each piece of equipment would cost to purchase new. Tax incentives and a much larger fund are needed to help professional landscape companies make the transition.

The proposed implementation, by the year 2024, does not take into consideration the deficiencies associated with current zero-emission equipment for commercial uses. While battery-powered landscape equipment is a good solution for many suburban and urban homeowners with small yards to maintain, the equipment isn't ready for high-volume professional use. It is less powerful, doesn't work as well on slopes and grades, and takes significantly more time to complete the same task as existing equipment.

Additionally, California lacks the infrastructure necessary to make the transition. Rolling blackouts in California demonstrate that the electric infrastructure needed to maintain charges on battery-powered equipment is insufficient. Also, the infrastructure within the industry isn't yet in place to make the transition. There is a lack of dealers and mechanics capable of servicing zero-emission equipment, which, because it is newer technology, requires a large number of highly experienced technicians to handle what will be a significantly increased demand for product servicing. Also, landscape companies would need to upgrade and redesign facilities to support a large number of charging stations and greatly increased electrical loads.

Of the nearly 13 million gas-powered SORE in California today, 85% are owned and operated by residential users. Commercial landscape businesses use only a small percentage, 15% of the equipment in the state, yet they would bear the significant financial burden of the transition.

According to its own data, CARB can still achieve its 2031 and 2035 emissions targets by extending the timeline for eliminating the sale of gas-powered commercial landscape equipment to a later date, and they have the discretion to do just that. But they have ignored pleas from the landscape industry to allow a reasonable amount of time for the transition.

Smart and responsible policies require significant stakeholder engagement and industry input and support. Unfortunately, the CARB proposal has not taken the significant impact to businesses into account.

As an industry, we care deeply for the environment. At the same time, we value our businesses, employees, and the customers and communities we serve. We must chart a path forward to move beyond gas-powered equipment, but we must do so responsibly and equitably in a way that does not punitively single out the landscape industry and its tens of thousands of entrepreneurs and employees.

We look forward to continuing to work with CARB, Governor Newsom, the California Legislature, and the U.S. Environmental Protection Agency to amend this initial proposal. To create a reasonable path forward for landscape companies to transition to ZEE equipment so they can continue to do the vital work of maintaining healthy community green spaces throughout the state of California and across our nation.