

From: [Jeff Jensen](#)
To: [Jalipa, Brent \(BOS\)](#)
Cc: [Board of Supervisors \(BOS\)](#); [Ginsburg, Phil \(REC\)](#); [Teahan, Kevin \(REC\)](#); [Summers, Ashley \(REC\)](#); [Marc Connerly](#); [Andersen, Eric \(REC\)](#); [Jue, Tyrone \(ENV\)](#); [Chu, Carmen \(ADM\)](#); [Groffenberger, Ashley \(MYR\)](#); [Bo Links](#); [Potter, Spencer \(REC\)](#); [Mar, Gordon \(BOS\)](#); [Richard Harris Jr.](#)
Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt. - Board of Supervisors Regular Meeting- September 20, 2022
Date: Monday, September 19, 2022 10:56:55 AM
Attachments: [City of SF 09.19.22-1.pdf](#)

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Good morning Brent,

Please accept the attached comments from the Golf Course Superintendents Association of Northern California in opposition to File 22-0199, Admin., Police Codes – Ban on Gas-Powered Landscaping Equipment. The comments are a supplement to our previously submitted comments on May 2, 2022, and September 13, 2022.

If you could please distribute to the Board of Supervisors prior to tomorrow’s hearing it would be greatly appreciated. Thank you for your time and consideration.

Sincerely,

Jeff Jensen | Field Staff, Southwest Region
Golf Course Superintendents Association of America
[1421 Research Park Drive | Lawrence, KS 66049](#)
800.472.7878, ext. 3603 | 785.840.7879 Direct
[www.gcsaa.org](#) | [GCSAA Foundation](#) | [GCM](#) | [Facebook](#) | [Twitter](#)





September 19, 2022

City and County of San Francisco
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA. 94102

Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt.
Board of Supervisors Regular Meeting, September 20, 2022, Item No. 1

Dear Board of Supervisors:

On behalf of the Golf Course Superintendents Association of Northern California (GCSANC) and our member facilities in the City and County of San Francisco, please accept the following comments in strong opposition to Administrative, Police Codes – Ban on Gas-Powered Landscaping Equipment. This supplements our previously submitted letters to the Board dated May 2, 2022, and September 13, 2022.

The ordinance as currently proposed does not provide enough detailed information to pass on the first reading. While it does address temporary waivers, a buy-back program, incentive program, outreach/education program, enforcement, and safe disposal initiative, it is woefully lacking in detail in each of these areas.

We share the City and County of San Francisco's ultimate goal to reduce emissions, but it needs to be done in a practical and responsible manner while mitigating financial, availability and safety concerns. Please refer to our comments submitted on May 2, 2022, for a detailed review of these concerns.

To reiterate, we are not opposed to the implementation of zero emission equipment, and we believe that it will play a large role in golf course maintenance operations moving forward, but we must be able to address issues with technology, manufacturing/supply chain and delivery infrastructure as well as meet the "fit for intended use" standard for large landscapes such as parks, golf courses, cemeteries, and sports fields.

GCSANC requests that the City and County of San Francisco follow the rulemaking process introduced by CARB on Dec. 9, 2021, that bans the manufacturing and sale of most small off-road engines by Jan. 1, 2024, but continues to allow use for those products manufactured and sold (including used equipment purchases) before that date while conducting an in-depth financial and feasibility analysis which will assist in establishing a more realistic timeframe for implementation of this ordinance.

We believe that this can be a win-win situation for both The City and County of San Francisco and our various landscape operations if we take the time to properly address the ordinance and establish a more realistic timeframe for implementation.

Sincerely,

Jeff Jensen

Jeff Jensen
Southwest Field Staff Representative
Golf Course Superintendents Association of America, Golf Course Superintendents Association of
Northern California
1421 Research Park Dr.
Lawrence, KS 66049
C: (785) 840-7879

cc:

Phil Ginsburg, Gen. Mgr., San Francisco Recreation and Park Department

From: [Jeff Jensen](#)
To: [Jalipa, Brent \(BOS\)](#)
Cc: [RonenStaff \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Marstaff \(BOS\)](#); [Melgar, Myrna \(BOS\)](#); [Board of Supervisors. \(BOS\)](#); [Ginsburg, Phil \(REC\)](#); [Teahan, Kevin \(REC\)](#); [Summers, Ashley \(REC\)](#); [Marc Connerly](#); [Andersen, Eric \(REC\)](#); [Jue, Tyrone \(ENV\)](#); [Chu, Carmen \(ADM\)](#); [Groffenberger, Ashley \(MYR\)](#); [Jeff Jensen](#); [Bo Links](#); [Potter, Spencer \(REC\)](#); [Mar, Gordon \(BOS\)](#)
Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt.
Date: Tuesday, September 13, 2022 6:51:13 AM
Attachments: [City of SF 09.12.22.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning Brent,

Please accept the attached comments from the Golf Course Superintendents Association of Northern California in opposition to File 22-0199, Admin., Police Codes – Ban on Gas-Powered Landscaping Equipment. The comments are a supplement to our previously submitted comments to the Budget and Finance Committee on May 2, 2022.

If you could please distribute to the committee members prior to tomorrow's hearing it would be greatly appreciated. Thank you for your time and consideration.

Sincerely,

Jeff Jensen | Field Staff, Southwest Region
Golf Course Superintendents Association of America
[1421 Research Park Drive | Lawrence, KS 66049](#)
800.472.7878, ext. 3603 | 785.840.7879 Direct
[www.gcsaa.org](#) | [GCSAA Foundation](#) | [GCM](#) | [Facebook](#) | [Twitter](#)





September 13, 2022

City and County of San Francisco
Board of Supervisors
Budget & Finance Committee
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA. 94102

Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt.
Budget Committee, September 14, 2022, Item No. 1

Dear Supervisors and Budget and Finance Committee members:

On behalf of the Golf Course Superintendents Association of Northern California (GCSANC) and our member facilities in the City and County of San Francisco, please accept the following comments in strong opposition to Administrative, Police Codes – Ban on Gas-Powered Landscaping Equipment. This supplements our previously submitted letter to the Board dated May 2, 2022, which can be found in the Committee’s September 14 meeting packet (Committee Pkt 091422) at pages 63-66.

While we understand the need to develop an emission reduction strategy to reduce pollution and noise in the state, the documents contained in the September 14 agenda are identical to the documents submitted in the May 4 hearing and do not further address any of the financial and more importantly, feasibility and timeline issues associated with a complete transition to zero emission equipment.

We have numerous concerns on certain pieces of equipment for which there are no or extremely limited zero emissions alternatives. Walking aerators (ex. Toro ProCore 648 – no alternatives to our knowledge), bunker rakes, walk behind mowers, hover mowers and numerous spray units will create hardships for large landscape users, including golf facilities. The wait time to acquire these pieces of equipment has not changed since the committee held their last meeting on May 4 and we have no information to indicate that production and delivery of this type of equipment will change in the near future.

Other Issues include:

- The power is just not comparable yet
- Difficult to use exclusively on large scale commercial and governmental jobs like parks, golf courses, HOAs, resorts, business parks and other public and commercial green spaces
- Requires too many batteries to conduct their job function in an efficient manner
- Charging issues in the field and in the workshop
- Durability concerns
- Batteries are too heavy

- Cannot mow slopes on riding mowers because of the weight issue of currently available mowers makes them unstable.
- Mow times are longer, and batteries cannot last a full workday
- Leaf removal during seasonal changes is difficult
- Debris removal to mitigate fire spread is significantly more difficult
- Lack of dealers and maintenance shops to support transition
- Batteries are not interchangeable between brands

We share the City and County of San Francisco's ultimate goal to reduce emissions, but it needs to be done in a practical and responsible manner while mitigating financial, availability and safety concerns. It is not a one size fits all approach when it comes to zero emission equipment. The technology and ability to mass produce and deliver this equipment and completely replace gasoline-powered equipment 25 hp and under by Jan. 1, 2024, on city owned property and Jan. 1, 2026, on all property is not feasible for commercial and governmental department end users.

GCSANC requests that the City and County of San Francisco follow the rulemaking process introduced by CARB on Dec. 9, 2021, that bans the manufacturing and sale of most small off-road engines by Jan. 1, 2024 but continues to allow use for those products manufactured and sold (including used equipment purchases) before that date while conducting an in-depth financial and feasibility analysis which will assist in establishing a more realistic timeframe for implementation of this ordinance.

This will allow commercial and governmental department end users, including public and private golf course superintendents, the opportunity to continue to use their current equipment while starting the process of integrating ZEE into their operations as it becomes more technologically feasible and available.

Sincerely,

Marc Connerly

Marc Connerly
Executive Director
Golf Course Superintendents Association of Northern California
2235 Park Towne Cir., 2nd Floor
Sacramento, CA 95825
C: (916) 214-6495

cc:

Phil Ginsburg, Gen. Mgr., San Francisco Recreation and Park Department

From: [Richard Harris Jr.](#)
To: [Jalipa, Brent \(BOS\)](#); [RonenStaff \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Marstaff \(BOS\)](#); [Melgar, Myrna \(BOS\)](#)
Cc: [MelgarStaff \(BOS\)](#); [ChanStaff \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Board of Supervisors, \(BOS\)](#); [Ginsburg, Phil \(REC\)](#); [Teahan, Kevin \(REC\)](#); [Summers, Ashley \(REC\)](#); ["Marc Connerly"](#); [Andersen, Eric \(REC\)](#); [Jue, Tyrone \(ENV\)](#); [Chu, Carmen \(ADM\)](#); [Groffenberger, Ashley \(MYR\)](#); ["Jeff Jensen"](#); [Bo Links](#); [Potter, Spencer \(REC\)](#); [Mar, Gordon \(BOS\)](#)
Subject: Budget & Finance Committee Mtg. Sept. 14; Item 1, File No. 22-0199; Ban on Gas-Powered Landscaping Equipment; SF Public Golf Alliance Supplemental Opposition Letter
Date: Monday, September 12, 2022 9:20:15 AM
Attachments: [Ltr.SFPGA.BOS.BUDGET.COMM.gas-ban.ord.9.12.22.pdf](#)

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Budget & Finance Committee Meeting Sept. 14; Item 1, File No. 22-0199; Ban on Gas-Powered Landscaping Equipment; SF Public Golf Alliance Supplemental Opposition Letter

Attached above please find Supplemental Opposition Letter of San Francisco Public Golf Alliance in the matter of File No. 22-0199.

Please include this letter in the Public Record of the Budget Committee's Sept. 14 public hearing, and circulate to the Committee members in advance of the meeting.

Also please confirm receipt.

Best Regards, and

Thank you.

Richard Harris

San Francisco Public Golf Alliance

1370 Masonic Avenue

San Francisco, CA 94117-4012

Phone: (415) 290-5718

SAN FRANCISCO
PUBLIC GOLF ALLIANCE



1370 Masonic Ave., San Francisco, CA 94104 • 415-290-5718 • info@sfpublicgolf.org

September 11, 2022

San Francisco Board of Supervisors
Budget & Finance Committee
City Hall
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94101

**Re: Budget & Finance Committee, Sept. 14, 2022 Meeting, Item 1, File 22-0199
Opposition of San Francisco Public Golf Alliance to Use Ban on Gas-Powered
Landscape Maintenance Equipment.**

This is a cart-before-the-horse ordinance, to ban use of gas-powered equipment, effective January 1, 2024 -- before the City can possibly have in place the electric infrastructure needed for the battery-charging facilities necessary for battery-powered replacement equipment.

Dear Chair Ronen and Committee Members,

As drafted, the Ordinance is unready. Its cost projections are uncertain, incomplete, and unsupported by evidence. The Ordinance's January 1, 2024 use ban date is impractical – and in reality, impossible for most of the small riding mowers, maintenance and utility carts, and other medium-sized power maintenance equipment used by Rec & Park, Public Works, PUC, and City Government's other biggest users of landscape maintenance equipment. The Ordinance does not provide enough time to permit, design and build a City-wide network of electrically-powered charging facilities (estimated to cost upwards of \$750,000 to \$1 Million apiece¹) needed to charge the batteries for the replacement battery-powered equipment – even if such equipment were itself available. These and related problems with the proposed Ordinance were raised in the Committee's April 27, 2022 public hearing, at which the Mayor's Budget Director testified that there is no provision in current 4-year budget projections for the City to fund this Ordinance.

The Committee has not held a hearing on the matter since May 4, when it was continued to May 11, and then in turn continued indefinitely. The draft Ordinance (captioned "Amended in Committee April 27, 2022") and the supporting Revised Legislative Digest and Budget and Legislative Analyst Report that appear in the Committee's September 14 agenda packet are identical to the versions of these documents in the Committee's May 4 hearing packet.

¹ Budget and Legislative Analyst Report, Sept. 14, 2022, at pages 1 and 5: [Cmte Pkt 091422](#), at 23, 28/109.

We raised these issues in our letters to Your Committee dated May 2, 2022² and April 25, 2022³, which we incorporate herein by this reference. Copies of these letters are found in the Committee's September 14 meeting packet ([Cmte Pkt 091422](#)) at pages 67-70 and 91-93, respectively. Issues of current unavailability, inadequate power, and high cost of battery-powered replacement landscape equipment are also raised in the May 2, 2022 letter to Your Committee from the Northern California chapter of the Golf Course Superintendents Association of America⁴, a copy of which is found in the Committee's September 14 meeting packet ([Cmte Pkt 091422](#)) at pages 63-66.

While we share the Sponsors' aspirations for a future with less pollution, we believe that the City's leaders should take the additional necessary steps now to make reasonable projections about how the changeover will happen, and how equipment and personnel will be used in the changeover, how many new electrically-powered battery charging facilities will be needed by which City Departments and where will they be located and what will be the expense of these facilities, what planning and interdepartmental coordination will be required to design, permit and build the facilities (e.g., coordination with the SF Public Utilities Commission). None of this work has been done, and we have seen nothing to indicate that this information-gathering and planning process has yet begun.

Changing-over City Departments' current landscaping equipment from gas-powered technology to battery power – will require not only replacement of the equipment itself, but also construction and convenient distribution throughout the City of enough electricity-powered battery charging facilities to keep the new equipment working. This is similar to the issue with the auto industry's move from gasoline-powered to battery-powered passenger and commercial vehicles. It can't happen simply by replacing gas engines with electric engines: a nationwide network of conveniently located charging stations is required.

At the Budget Committee's April 27 public hearing, Supervisor Melgar, sponsor of the proposed Ordinance, expressed her belief that riding mowers are preempted by the Federal Clean Air Act, and accordingly would not be covered by the Ordinance.⁵ But this is not the case – in fact, riding mowers 25 horsepower and under are not preempted by Federal law.⁶

Also at its April 27 public hearing, the Budget Committee was told by the Mayor's Budget Director Ashley Groffenberger that the Budget Office's current projections for the next

² Letter, SF Public Golf Alliance to SF Board of Supervisors. Budget & Finance Committee, May 2, 2022 <https://drive.google.com/file/d/1oaEV7nXnUu1GqKPbcq4YTxLGZdqm4kBb/view?usp=sharing>

³ Letter, SF Public Golf Alliance to San Francisco Board of Supervisors, Budget & Finance Committee, Apr. 25, 2022: https://drive.google.com/file/d/1l_KY6zTx0BhEEwS9u1jZgGEi15YTBR0y/view?usp=sharing

⁴ Letter, NorCal Chptr. Golf Course Superintendents Association of America to SF Supes, Budget & Finance Committee, May 2, 2022: <https://drive.google.com/file/d/1q3PVk-ZPh0d7swK--2sH5ikG1h3iekq8/view>

⁵ SFgovTV video of Budget Committee Hearing, April 27, 2022, Supervisor Melgar comment, at 1:53:25-55: https://sanfrancisco.granicus.com/player/clip/41133?view_id=192&redirect=true

⁶ See e-mail, May 3, 2022 from Dorothy Fibiger, California Air Resources Control Board, attaching CARB, "SORE – List to Determine Preempt Off-Road Applications <https://ww2.arb.ca.gov/sore-list-determine-preempt-road-applications>", found in the Committee's September 14, 2022 meeting packet, [Cmte Pkt 091422](#), page 62.

four fiscal years do not include funds to support the conversion from gas to battery-powered technology that would be mandated by the Proposed Ordinance.⁷

The Ordinance's answer to all of this uncertainty – a complicated provision for waiver applications and authority in the Department of the Environment to grant an indefinite number of discretionary annual waivers to Departments – is vaguely worded and would naturally lead to arbitrary – if at all – enforcement. This would lead to budgetary and administrative uncertainty in the affected departments – in addition to large amounts of staff time at Rec & Park and the other primarily affected departments.

CONCLUSION

For these reasons, and as more fully discussed in our letters to Your Committee of May 2 and April 25, 2022, we oppose the Ordinance.

Respectfully,
San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

cc: Supervisor Myrna Melgar
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Ahsha Safai
Angela Calvillo, Clerk of the Board of Supervisors
Tyrone Jue, Acting Director, Dept. of the Environment
Carmen Chu, City Administrator
Ashley Groffenberger, Mayor's Office Budget Director
Phil Ginsburg, Gen. Mgr., Recreation and Park Department
Eric Anderson, Assistant Director of Operations, Recreation and Park Department
Kevin Teahan, Turf and Golf Section Manager, Recreation and Park Department
Spencer Potter, Natural Areas Division, Recreation and Park Department
Recreation and Park Commission
Marc Connerly, Ex. Dir, GCSAA Northern California
Jeff Jensen
Bo Links, Esq.

⁷ Sfgovtv video, Budget Committee Hearing, Apr. 27, Ashley Groffenberger, at 1:47:10-1:48:15:
https://sanfrancisco.granicus.com/player/clip/41133?view_id=192&redirect=true

From: [Richard Harris Jr.](#)
To: [Jalipa, Brent \(BOS\)](#); [RonenStaff \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Marstaff \(BOS\)](#); [Melgar, Myrna \(BOS\)](#)
Cc: [MelgarStaff \(BOS\)](#); [ChanStaff \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Haneystaff \(BOS\)](#); [Board of Supervisors, \(BOS\)](#); [Ginsburg, Phil \(REC\)](#); [Teahan, Kevin \(REC\)](#); [Summers, Ashley \(REC\)](#); ["Marc Connerly"](#); [Andersen, Eric \(REC\)](#); [Jue, Tyrone \(ENV\)](#); [Chu, Carmen \(ADM\)](#); ashley.graffenberger@sfgov.org
Subject: Budget & Finance Committee Mtg. May 11; Item 1, File No. 22-0199; Ban on Gas-Powered Landscaping Equipment; SF Public Golf Alliance Supplemental Opposition
Date: Friday, May 6, 2022 10:46:15 AM

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Budget & Finance Committee Mtg. May 11; Item 1, File No. 22-0199; Ban on Gas-Powered Landscaping Equipment; SF Public Golf Alliance Supplemental Opposition

Dear Budget & Finance Committee and Members

Supplementing our previously-filed Opposition and Supplemental Opposition letters on file with the Committee, **we submit, below, partial copy of a May 3 e-mail from California Air Resources Board** staff, with link to a CARB memo entitled ["SORE - List to Determine Preempt Off-Road Applications"](#). **As noted by CARB Staff, "riding mowers are not on the list of preempt equipment."**

From: Fibiger, Dorothy@ARB <dorothy.fibiger@arb.ca.gov>

Sent: Tuesday, May 3, 2022 3:06 PM

Subject: RE: Riding mowers - 25hp & under

Riding mowers are not on the list of preempt equipment, which can be found here: <https://ww2.arb.ca.gov/sore-list-determine-preempt-road-applications>. Please let me know if you have further questions.

Best,

Dorothy

Please confirm receipt of this note, include this note in the Public Record of the Budget Committee's May 11 public hearing, and circulate to the Committee members in advance of the meeting.

Thank you, and

Best Regards

Richard Harris

San Francisco Public Golf Alliance

1370 Masonic Avenue

San Francisco, CA 94117-4012

Phone: (415) 290-5718



May 2, 2022

City and County of San Francisco
Board of Supervisors
Budget & Finance Committee
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA. 94102

Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt.
Budget Committee, May 4, 2022, Item No. 1

Dear Supervisors and Budget and Finance Committee members:

On behalf of the Golf Course Superintendents Association of Northern California (GCSANC) and our member facilities in the City and County of San Francisco, please accept the following comments in strong opposition to Administrative, Police Codes – Ban on Gas-Powered Landscaping Equipment. This supplements our previously submitted letter to the Board dated March 29, 2022.¹

While we understand the need to develop an emission reduction strategy to reduce pollution and noise in the state, it was apparent at the April 27, 2022, Budget and Finance Committee hearing that the ordinance relies on unsupported and unproven data/assumptions/costs and lacks sufficient evidence of technical feasibility.

As stated by several committee members at the hearing, the cost of charging stations and batteries has not been addressed by the ordinance and it was noted that there is no expectation in the Mayor's current budget plans for next four years to address those expenses. Many variables are involved in purchase, design, and buildout of these requisite charging stations, but they can run in excess of a \$1 million and can require re-wiring the entire building. There can also be significant fire and air quality safety issues with charging stations that need to be addressed.

The ordinance was amended at the April 27 Budget Committee meeting to allow waivers if replacement technology does not exist or if a department is unable to purchase replacement equipment for an amount less than or equal to 300 percent of the cost of the equivalent. While this amendment does provide some flexibility, the costs to get to this determination should be stated and broken down into financial detail including the up-front costs to purchase, continual operating costs including batteries and particularly the increase in labor that will be required to efficiently use zero emission equipment.

¹ Letter, GCSAANC to SF Supervisors, Budget Cttee, Oppo.File22-0199, 3.29.22:
<https://drive.google.com/file/d/1tW794DZv5UIZwcjKmwGAecEQSf-Zgqhh/view?usp=sharing>

Additionally, a buy-back program as well as a safe disposal program are discussed in the ordinance, but no financial disclosure on either program is available. A complete transition to zero emission equipment in less than two years on city owned property and less than four years on private property will be a significant financial impediment. It will be potentially devastating to privately owned landscaping entities.

Data from manufacturers shows that commercial ZEE can have an upfront cost of as much as 2 to 4 times that of their gas-powered counterparts:

- One popular manufacturer's commercial-grade electric leaf blower retails for \$350 - \$400, similar to the same manufacturer's gas-powered unit. However, to use this electric leaf blower for an entire workday requires the purchase of extra batteries and chargers thus, driving the up-front cost to exceed \$2,000.
- One of the most popular commercial gas-powered riding mowers cost ranges from approximately \$10,000 to \$11,000 while its ZEE counterpart cost starts at approximately \$21,000 (all prices MSRP).
- A commercial grade gas-powered string trimmer from a leading manufacturer starts at \$329 but a commercial grade battery-powered unit from the same manufacturer (including the extra batteries and chargers needed to complete a day's work) exceeds \$1,000.
- According to a survey conducted by the California Landscape Contractors Association and the National Association of Landscape Professionals, an average crew size of 3 would need a total of 34 batteries to complete tasks for 20 lawns not including a riding lawnmower which would not have the charge to complete that task. Batteries also will need to be replaced every 300-500 charge cycles which means they would need to be replaced at least a minimum of one-time during the lifespan of the product. The battery estimate is based on lawns, not large commercial landscapes, so the above example would be conservative for large properties².

More problematic, the majority of these commercial ZEE products are currently not available due to issues with technology, manufacturing/supply chain and delivery infrastructure caused by the Covid 19 pandemic and current political strife and current zero emission equipment does not currently meet the "fit for intended use" standard for large landscapes such as parks, golf courses, cemeteries, and sports fields.

²NALP created an advisory group of larger national landscape companies. This group provided NALP with a range of data and technical guidance and the information in this table are conservative estimations. This scenario is based more off residential services as they are simpler to model based on quarter acre lots. The reality is that total batteries needed is likely higher in exclusive commercial and larger settings where landscape services are performed.

We have numerous concerns on certain pieces of equipment for which there are no or extremely limited zero emissions alternatives. Walking aerators (ex. Toro ProCore 648 – no alternatives to our knowledge), bunker rakes, walk behind mowers, hover mowers and numerous spray units will create hardships for large landscape users, including golf facilities. The wait time to acquire these pieces of zero emission equipment (if alternative is even manufactured) currently exceeds 14 months in most cases.

Other Issues include:

- The power is just not comparable yet
- Difficult to use exclusively on large scale commercial and governmental jobs like parks, golf courses, HOAs, resorts, business parks and other public and commercial green spaces
- Requires too many batteries to conduct their job function in an efficient manner
- Charging issues in the field and in the workshop
- Durability concerns
- Batteries are too heavy
- Cannot mow slopes on riding mowers because of the weight issue of currently available mowers makes them unstable.
- Mow times are longer, and batteries cannot last a full workday
- Leaf removal during seasonal changes is difficult
- Debris removal to mitigate fire spread is significantly more difficult
- Lack of dealers and maintenance shops to support transition
- Batteries are not interchangeable between brands

These issues are evident in the current eight percent adoption rate by professional landscape companies (CARB/CSUF Study).

We share the City and County of San Francisco's ultimate goal to reduce emissions, but it needs to be done in a practical and responsible manner while mitigating financial and safety concerns. It is not a one size fits all approach when it comes to zero emission equipment. The technology and ability to mass produce and deliver this equipment and completely replace gasoline-powered equipment 25 hp and under by Jan. 1, 2024, on city owned property and Jan. 1, 2026, on all property is not feasible for commercial and governmental department end users.

GCSANC requests that the City and County of San Francisco follow the rulemaking process introduced by CARB on Dec. 9, 2021, that bans the manufacturing and sale of most small off-road engines by Jan. 1, 2024 but continues to allow use for those products manufactured and sold (including used equipment purchases) before that date while conducting an in-depth analysis which will assist in establishing a more realistic timeframe for implementation of this ordinance.

This will allow commercial and governmental department end users, including public and private golf course superintendents, the opportunity to continue to use their current equipment while starting the process of integrating ZEE into their operations as it becomes more technologically feasible and available.

Sincerely,

Marc Connerly

Marc Connerly
Executive Director
Golf Course Superintendents Association of Northern California
2235 Park Towne Cir., 2nd Floor
Sacramento, CA 95825
C: (916) 214-6495

cc:

Phil Ginsburg, Gen. Mgr., San Francisco Recreation and Park Department



May 2, 2022

San Francisco Board of Supervisors
Budget & Finance Committee
City Hall
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94101

Re: Budget & Finance Committee, May 4, 2022 Meeting, Item 1, File 22-0199

**Supplemental Opposition of San Francisco Public Golf Alliance
To Ban on Gas-Powered Landscape Maintenance Equipment**

Dear Chair Ronen and Committee Members,

This is to supplement the April 25, 2022 Opposition letter of the non-profit public benefit San Francisco Public Golf Alliance, which letter is incorporated herein by this reference.¹ In that letter, we pointed to substantial upfront City expenditures for electrical connections, batteries, and battery charging stations that would be necessary to enable the draft legislation's vision of pollution-free landscaping equipment. And we urged in that letter – and again now -- that the City should take the time to understand the logistical and operational realities – and consequent expenses – for the City's largest user of landscaping equipment, the Recreation and Park Department

The proposed Ordinance, File No. 22-0199, was amended in Committee on April 27, 2022.² In addition to a copy of the amended legislation, we include below a link to the Budget and Legislative Analyst's Supplemental Report on this matter, dated April 29, 2022.³ These give rise to the following comments and questions:

- At the April 27 initial public hearing on the proposed Ordinance, Supervisor Melgar expressed her belief that the proposed Ordinance does not cover any ride-on mowers,

¹ Letter, San Francisco Public Golf Alliance to San Francisco Board of Supervisors, Budget & Finance C'ttee, Apr. 25, 2022: https://drive.google.com/file/d/11_kY6zTx0BhEEwS9u1jZgGEi15YTBR0y/view?usp=sharing

² File No. 220199, as Amended in Committee, 4.27.22:
<https://sfgov.legistar.com/View.ashx?M=F&ID=10853595&GUID=36B14B63-213A-4B48-9BE0-1E836831E657>

³ Budget & Legislative Analyst's Report, April 29, 2022, at pages 1-7:
<https://sfgov.legistar.com/View.ashx?M=F&ID=10860687&GUID=0E91E87A-D76E-4CFB-8A84-FB710ED77082>

which she said are preempted by the Federal Clean Air Act, and not governed by State or local Law.⁴ We believe this to be incorrect. Rather, we are informed and believe that the Environmental Protection Agency in or about May 2015 authorized the California Air Resources Board regulation Small Off-road Engines Regulations (SOAR), for small gasoline-powered engines up to 25 horsepower, including riding mowers.⁵

- The issue of the SOAR regulations is very tricky, involving Federal, State, and local laws. And the mower issue is also tricky. We are informed and believe that San Francisco Recreation and Park has some small riding mowers that are diesel-fueled, some that are gasoline-fueled, some that are 25 horsepower, and some that are 24.5 horsepower and smaller. We don't know how many or where they are stationed in the City's various motor pools. To get a handle on the size of the issue, we think that an inventory of the different sizes and fuel-uses of small mowers is warranted, so that early rough calculations can be made about logistical issues and the number and locations of the requisite charging stations and electrical connections.
- We do know that these SOAR mowers are used in areas where the City's big riding mowers cannot reach (such as small, narrow spaces, between flowerbeds (such as at the Rose Garden, the Arboretum, around trees, benches, steep slopes and other difficult spots, at lawn bowling greens and other specialty areas, and on and around golf course greens.
- There is an apparent inconsistency, which we do not understand, between (i) the Legislative Analyst's April 29 report which states, at page 3, that "Small off-road engines are defined by state code as **25.5 horsepower or less**"⁶ (emphasis added), and (ii) the proposed Ordinance, which in its April 27 Amended version, defines "polluting garden and utility equipment" as "gasoline-powered equipment **under 25** horsepower."⁷ (emphasis added)
- The Legislative Analyst's April 29 Report estimates Recreation and Park Department's "upfront costs" at about \$9 Million out of the total "upfront costs" to all City departments of approximately \$10.4 Million. But the Rec & Park "upfront costs" estimates do not include, according to the Legislative Analyst, "the cost of bringing new primary electrical service to a site [which] would be as high as \$750,000 to \$1 Million per site to trench, lay new conduit, and install new electric circuits".⁸ There is no mention in

⁴ SFgovTV video of Budget Committee Hearing, April 27, 2022, Supervisor Melgar comment, at 1:53:25-55: https://sanfrancisco.granicus.com/player/clip/41133?view_id=192&redirect=true

⁵ California State Nonroad Engine Pollution Control Standards; Small Off-Road Engines Regulations; Notice of Decision, Federal Register / Vol. 80, No. 87 / Wednesday, May 6, 2015 / Notices 26041 <https://www.govinfo.gov/content/pkg/FR-2015-05-06/pdf/2015-10610.pdf>

⁶ Budget & Legis. Analyst's Apr. 29 Report, p. 3 <https://sfgov.legistar.com/View.ashx?M=F&ID=10860687&GUID=0E91E87A-D76E-4CFB-8A84-FB710ED77082>

⁷ **Legislation Version 2** <https://sfgov.legistar.com/View.ashx?M=F&ID=10853595&GUID=36B14B63-213A-4B48-9BE0-1E836831E657>

⁸ Budget & Legis. Analyst's Apr. 29 Report, at p. 5 and Exhibit 1 "Cost Estimates": <https://sfgov.legistar.com/View.ashx?M=F&ID=10860687&GUID=0E91E87A-D76E-4CFB-8A84-FB710ED77082>

the Legislative Analyst's April 29 Report (or in the Analyst's prior April 22 Report discussed in our April 25 letter) of the cost of the charging stations themselves. Nor is there any count of the number or locations of the charging stations and new electrical connections to the charging stations that would be necessitated to convert to battery power for all of Rec & Park's equipment at all of its locations throughout the City. Nor is there any discussion in the Staffing and Contractor Estimates for Proposed Ordinance" section of the Legislative Analyst's April 29 Report, at page 6, of the additional costs for maintenance laborers using the battery-powered equipment, which presumably would involve extra time for charging and/or replacing batteries, and/or for returning to a motor pool to pick up a freshly-charged SOAR mower when the battery on mower #1 ran down.

- Without even a rudimentary operational explanation and/or understanding of how the conversion to battery-powered SOAR mowers would work on the Rec & Park Department's extensive park areas spread all over the City, it is impossible to reasonably project the expense of this conversion.
- The Committee and the full Board of Supervisors should make an effort to gain an understanding of the scope of the expense, so that the City Administrator and the Mayor can responsibly make budget projections. So that this is not simply a Blank Check.
- The issue of the batteries themselves is complicated. The cost of acid batteries and lithium batteries are different, and the requirements for the charging stations and charging barns are different for these different types of batteries. There is nothing in the Legislative Analyst's Report that begins to discuss this issue, which has worker safety as well as facility cost and battery life implications.
- There was some discussion at the April 27 Budget Committee hearing that there will be state and federal grants to pay for some of the upfront charging station and related electrical connection charges. But this shouldn't be taken for granted: state and federal grants can come and go with the political winds and economic times.
- At the Budget Committee's April 27 public hearing, the Mayor's Budget Director Ashley Graffenberger said that the Mayor's Office does not have provision in its projections for the next four years for the additional upfront expense of the conversion projected by the Proposed Ordinance.⁹
- Additional issues regarding the functional capabilities of replacement equipment and other issues are raised in the May 2, 2022 letter to the Budget Committee from the Golf Course Supervisors Association of America, Northern California Chapter.¹⁰

⁹ Sfgovtv video, Budget Committee Hearing, Apr. 27, Ashley Graffenberger, at 1:47:45: https://sanfrancisco.granicus.com/player/clip/41133?view_id=192&redirect=true

¹⁰ Letter, GCSAANC to Budget Committee, May 2, 2022 <https://drive.google.com/file/d/1q3Pvk-ZPh0d7swK--2sH5ikGlh3iekq8/view?usp=sharing>

CONCLUSION

While we support the aspiration of a future with less pollution, we believe that the City, its citizens, and leaders should take the additional steps now to make reasonable projections about how the changeover will happen, and how the equipment and personnel will be used in the changeover. As written at this time, we find the proposed ordinance is unrealistic and its cost projections are a small fraction of what the true cost will likely be.

Respectfully,
San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

cc: Supervisor Myrna Melgar
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Matt Haney
Angela Cavillo, Clerk of the Board of Supervisors
Tyrone Jue, Acting Director, Dept. of the Environment
Carmen Chu, City Administrator
Ashley Graffenberger, Mayor's Office Budget Director
Phil Ginsburg, Gen. Mgr., Recreation and Park Department
Eric Anderson, Assistant Director of Operations, Recreation and Park Department
Kevin Teahan, Turf and Golf Section Manager, Recreation and Park Department
Recreation and Park Commission
Marc Connerly, Ex. Dir, GCSAA Northern California

From: [Jeff Jensen](#)
To: [Jalipa, Brent \(BOS\)](#); [RonenStaff \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Marstaff \(BOS\)](#)
Cc: [MelgarStaff \(BOS\)](#); [ChanStaff \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Haneystaff \(BOS\)](#); [Board of Supervisors. \(BOS\)](#); [Ginsburg, Phil \(REC\)](#); [Teahan, Kevin \(REC\)](#); [Summers, Ashley \(REC\)](#); [Marc Connerly](#); [Richard Harris Jr.](#)
Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt. Budget Committee, May 4, 2022, Item No. 1
Date: Monday, May 2, 2022 8:29:18 PM
Attachments: [City of SF 05.02.22-converted.pdf](#)

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Dear Supervisors, Budget Committee and Staff,

Please see the attached opposition to File 22-0199, Admin. Police Codes – Ban on Gas-Powered Landscaping Eqpt. from the Golf Course Superintendents Association of Northern California. Please include the comments in the public record for the hearing scheduled for May 4, 2022, and please distribute comments to committee members in advance of the hearing. Thank you for the opportunity to comment on this issue.

Sincerely,

Jeff Jensen | Field Staff, Southwest Region
Golf Course Superintendents Association of America
[1421 Research Park Drive | Lawrence, KS 66049](#)
800.472.7878, ext. 3603 | 785.840.7879 Direct
[www.gcsaa.org](#) | [GCSAA Foundation](#) | [GCM](#) | [Facebook](#) | [Twitter](#)





May 2, 2022

City and County of San Francisco
Board of Supervisors
Budget & Finance Committee
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA. 94102

Subject: Opposition to File 22-0199, Admin., Police Codes - Ban on Gas-Powered Landscaping Eqpt.
Budget Committee, May 4, 2022, Item No. 1

Dear Supervisors and Budget and Finance Committee members:

On behalf of the Golf Course Superintendents Association of Northern California (GCSANC) and our member facilities in the City and County of San Francisco, please accept the following comments in strong opposition to Administrative, Police Codes – Ban on Gas-Powered Landscaping Equipment. This supplements our previously submitted letter to the Board dated March 29, 2022.¹

While we understand the need to develop an emission reduction strategy to reduce pollution and noise in the state, it was apparent at the April 27, 2022, Budget and Finance Committee hearing that the ordinance relies on unsupported and unproven data/assumptions/costs and lacks sufficient evidence of technical feasibility.

As stated by several committee members at the hearing, the cost of charging stations and batteries has not been addressed by the ordinance and it was noted that there is no expectation in the Mayor's current budget plans for next four years to address those expenses. Many variables are involved in purchase, design, and buildout of these requisite charging stations, but they can run in excess of a \$1 million and can require re-wiring the entire building. There can also be significant fire and air quality safety issues with charging stations that need to be addressed.

The ordinance was amended at the April 27 Budget Committee meeting to allow waivers if replacement technology does not exist or if a department is unable to purchase replacement equipment for an amount less than or equal to 300 percent of the cost of the equivalent. While this amendment does provide some flexibility, the costs to get to this determination should be stated and broken down into financial detail including the up-front costs to purchase, continual operating costs including batteries and particularly the increase in labor that will be required to efficiently use zero emission equipment.

¹ Letter, GCSAANC to SF Supervisors, Budget Cttee, Oppo.File22-0199, 3.29.22:
<https://drive.google.com/file/d/1tW794DZv5UIZwcjKmwGAecEQSf-Zgqhh/view?usp=sharing>

Additionally, a buy-back program as well as a safe disposal program are discussed in the ordinance, but no financial disclosure on either program is available. A complete transition to zero emission equipment in less than two years on city owned property and less than four years on private property will be a significant financial impediment. It will be potentially devastating to privately owned landscaping entities.

Data from manufacturers shows that commercial ZEE can have an upfront cost of as much as 2 to 4 times that of their gas-powered counterparts:

- One popular manufacturer's commercial-grade electric leaf blower retails for \$350 - \$400, similar to the same manufacturer's gas-powered unit. However, to use this electric leaf blower for an entire workday requires the purchase of extra batteries and chargers thus, driving the up-front cost to exceed \$2,000.
- One of the most popular commercial gas-powered riding mowers cost ranges from approximately \$10,000 to \$11,000 while its ZEE counterpart cost starts at approximately \$21,000 (all prices MSRP).
- A commercial grade gas-powered string trimmer from a leading manufacturer starts at \$329 but a commercial grade battery-powered unit from the same manufacturer (including the extra batteries and chargers needed to complete a day's work) exceeds \$1,000.
- According to a survey conducted by the California Landscape Contractors Association and the National Association of Landscape Professionals, an average crew size of 3 would need a total of 34 batteries to complete tasks for 20 lawns not including a riding lawnmower which would not have the charge to complete that task. Batteries also will need to be replaced every 300-500 charge cycles which means they would need to be replaced at least a minimum of one-time during the lifespan of the product. The battery estimate is based on lawns, not large commercial landscapes, so the above example would be conservative for large properties².

More problematic, the majority of these commercial ZEE products are currently not available due to issues with technology, manufacturing/supply chain and delivery infrastructure caused by the Covid 19 pandemic and current political strife and current zero emission equipment does not currently meet the "fit for intended use" standard for large landscapes such as parks, golf courses, cemeteries, and sports fields.

²NALP created an advisory group of larger national landscape companies. This group provided NALP with a range of data and technical guidance and the information in this table are conservative estimations. This scenario is based more off residential services as they are simpler to model based on quarter acre lots. The reality is that total batteries needed is likely higher in exclusive commercial and larger settings where landscape services are performed.

We have numerous concerns on certain pieces of equipment for which there are no or extremely limited zero emissions alternatives. Walking aerators (ex. Toro ProCore 648 – no alternatives to our knowledge), bunker rakes, walk behind mowers, hover mowers and numerous spray units will create hardships for large landscape users, including golf facilities. The wait time to acquire these pieces of zero emission equipment (if alternative is even manufactured) currently exceeds 14 months in most cases.

Other Issues include:

- The power is just not comparable yet
- Difficult to use exclusively on large scale commercial and governmental jobs like parks, golf courses, HOAs, resorts, business parks and other public and commercial green spaces
- Requires too many batteries to conduct their job function in an efficient manner
- Charging issues in the field and in the workshop
- Durability concerns
- Batteries are too heavy
- Cannot mow slopes on riding mowers because of the weight issue of currently available mowers makes them unstable.
- Mow times are longer, and batteries cannot last a full workday
- Leaf removal during seasonal changes is difficult
- Debris removal to mitigate fire spread is significantly more difficult
- Lack of dealers and maintenance shops to support transition
- Batteries are not interchangeable between brands

These issues are evident in the current eight percent adoption rate by professional landscape companies (CARB/CSUF Study).

We share the City and County of San Francisco's ultimate goal to reduce emissions, but it needs to be done in a practical and responsible manner while mitigating financial and safety concerns. It is not a one size fits all approach when it comes to zero emission equipment. The technology and ability to mass produce and deliver this equipment and completely replace gasoline-powered equipment 25 hp and under by Jan. 1, 2024, on city owned property and Jan. 1, 2026, on all property is not feasible for commercial and governmental department end users.

GCSANC requests that the City and County of San Francisco follow the rulemaking process introduced by CARB on Dec. 9, 2021, that bans the manufacturing and sale of most small off-road engines by Jan. 1, 2024 but continues to allow use for those products manufactured and sold (including used equipment purchases) before that date while conducting an in-depth analysis which will assist in establishing a more realistic timeframe for implementation of this ordinance.

This will allow commercial and governmental department end users, including public and private golf course superintendents, the opportunity to continue to use their current equipment while starting the process of integrating ZEE into their operations as it becomes more technologically feasible and available.

Sincerely,

Marc Connerly

Marc Connerly
Executive Director
Golf Course Superintendents Association of Northern California
2235 Park Towne Cir., 2nd Floor
Sacramento, CA 95825
C: (916) 214-6495

cc:

Phil Ginsburg, Gen. Mgr., San Francisco Recreation and Park Department

Christina Weatherford

USF Gleeson
2130 Fulton St
SF CA 94117-1049

SAN FRANCISCO CA 9410

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BY 

Brent Jalipa, Clerk of the Board
Budget & Finance Committee
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, Ca. 94102-4689

Dear Members of the SF Board of Supervisors' Budget & Finance Committee,

I strongly support Supervisor Melgar's "Healthier, Cleaner, Quieter Communities Act," and urge you to vote yes on this important legislation.

This ordinance will prohibit the use of gas-powered landscaping equipment when there is an electric alternative available. It will support the replacement of this equipment for micro and small businesses through a city-sponsored transition fund program covering:

- A public education campaign
- A gas-powered small engine buy-back program
- Disposal of gas-powered equipment
- Wholesale purchase of equipment for City departments

Gas-powered equipment is a major source of pollution that disproportionately affects communities of color. Workers using gas-powered tools are uniquely exposed and suffer lung and heart ailments from constant exposure. Further, all SF residents are exposed to the dangers of increased pollution from the use of this equipment.

According to the California Air Resources Board (CARB), **smog-forming pollution from using a gas-powered leaf blower for 1 hour equals pollution from driving a car 1100 miles - the distance from San Francisco to Santa Fe.** The smog-forming pollution emitted from a gas-powered lawn mower for one hour is equivalent to the pollution generated from driving an internal combustion engine car 300 miles. As we stop using gas-powered equipment and switch to cleaner alternatives, residents will benefit with reduced noise and air pollution in their neighborhoods.

Invest in a greener, more sustainable San Francisco today!

Respectfully,



Kahlia Laszlo
371 Auza St.
Apt. 116B
San Francisco, CA
94118

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Jade Carter
University of San Francisco
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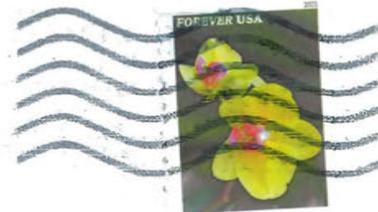
Respectfully,

Jacbe Carter


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Respectfully,

Zoe Binder

Micheline Virostek
331 Anza Street #217
San Francisco, CA 94118

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From: [Richard Harris Jr.](#)
To: [Jalipa, Brent \(BOS\)](#); hilary.ronan@sfgov.org; [Safai, Ahsha \(BOS\)](#); [Marstaff \(BOS\)](#)
Cc: [MelgarStaff \(BOS\)](#); [ChanStaff \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Haneystaff \(BOS\)](#); [Board of Supervisors. \(BOS\)](#); [Ginsburg, Phil \(REC\)](#); [Teahan, Kevin \(REC\)](#); [Summers, Ashley \(REC\)](#); "Marc Connerly"
Subject: Budget & Finance Committee Meeting Apr. 27; Item 12, File No. 22-0199; Ban on Gas-Powered Landscaping Equipment; SF Public Golf Alliance Opposition Letter
Date: Tuesday, April 26, 2022 12:23:24 PM
Attachments: [SFPGA.Ltr.BOSBudget.Opp.22-0199.4.25.22.pdf](#)

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Budget & Finance Committee Meeting Apr. 27; Item 12, File No. 22-0199; Ban on Gas-Powered Landscaping Equipment; SF Public Golf Alliance Opposition Letter

Attached above please find Opposition Letter of San Francisco Public Golf Alliance in the matter of File No. 22-0199.

Please include this letter in the Public Record of the Budget Committee's Apr. 27 public hearing, and circulate to the Committee members in advance of the meeting.

Also please confirm receipt.

Thank you.

Richard Harris

San Francisco Public Golf Alliance

1370 Masonic Avenue

San Francisco, CA 94117-4012

Phone: (415) 290-5718



April 25, 2022

San Francisco Board of Supervisors
Budget & Finance Committee
City Hall
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94101

Re: Budget & Finance Committee, Apr. 27, 2022 Meeting, Item 12, File 22-0199

San Francisco Public Golf Alliance opposes proposed ordinance to ban use of gas-powered landscape maintenance equipment. Conversion from gas-powered equipment is a worthy aspiration. But the Budget & Legislative Analyst's Report shows that the proposed January 2024 and January 2026 use ban dates are unachievable.

Here's a partial list of the problems spotted by the Analyst's Report:

- **Rec & Park is by far the biggest user of the would-be-banned equipment.**
- **Adequate replacements are not likely to be available by 2024.**
- **Battery costs are not factored into the operating cost estimates.**
- **The charging stations required for battery-powered replacements are not now in place, would be very expensive (\$750,000-\$1M each), and cannot possibly be in place by 2024.**
- **The number and locations of the needed charging stations are not identified in the Legislative Analyst's Report.**

Instead of the proposed January 2024 and 2026 use bans, we suggest a new purchase ban, together with a more comprehensive study on the cost, feasibility, availability, and operational questions raised by the Legislative Analyst's Report.

Dear Chair Ronen and Committee Members,

San Francisco Public Golf Alliance is a non-profit, public benefit organization, whose 6,500-plus members are mostly public course golfers in San Francisco and the Peninsula. As park users we appreciate the parks' positive impact on our physical and mental health, and as common gathering places. Because the City is so densely populated, the parks are especially important in San Franciscans' lives. So we encourage and support the Rec & Park Department in its work to maintain and properly upkeep the parks.

The City's public parks, gardens, and giant picnicking / playfields / performance grounds – Crocker-Amazon, West Sunset, the Marina Green, the Panhandle, the golf

courses, Dolores Park, Washington Square, Big Rec, the Polo Fields, Hellman Hollow, the Arboretum, the Conservatory, Kezar, Oracle Park, and you-name-it – all require high levels of maintenance involving power tools. The maintenance – and necessary maintenance tools – should not be taken for granted.

Despite worthy intentions to reduce reliance on fossil fuels, we are concerned – for reasons apparent in the Budget & Legislative Analyst’s April 22 Report to your Committee – that the proposed ban-on-use dates of January 2024 (for City Departments) and January 2026 (for private businesses) are impractical and unattainable. And we encourage the Committee to conform the proposed legislation – File No. 22-0199 – to California Assembly Bill 1346, adopted into California law in November 2021, which effectively banned the **sale** of new gas-powered small off-road engines after January 1, 2024, without banning continued **use** of previously-purchased equipment.¹

We base our objection on points raised in the Budget & legislative Analyst’s April 22 Report (<https://sfgov.legistar.com/View.ashx?M=F&ID=10833821&GUID=8E0B6493-F2B2-40CD-9459-A01CB5FEFFB0>):

- The Rec & Park Department’s costs for the mandated replacement of existing gas-powered equipment would be \$15,130,679 of the \$16,543,814 identified cost for all departments – that is to say 91.4%. (Report, pages 34 and 38 at Exhibit [Chart] 1.)
- This \$15,130,679 cost estimate for equipment that would have to be replaced by the Rec & Park Department does not include uncertain and unidentified costs for replacement of yet additional types of landscaping equipment, including “chainsaw, lawn mower, leaf blower/vacuum, pump, riding mower, trimmer/edger/brush cutter.” (Page 37 at footnote 4.)
- Both the PUC and Rec & Park staff reported that their departments’ use of replacement electrical landscaping maintenance equipment will “require additional batteries and charging units, increasing upfront and ongoing costs. In addition certain equipment quotes were substantially more expensive than the cost estimates included in the CARB analysis.” (Page 37 at footnote 5.)
- The \$15,130,679 cost estimate for Rec & Park also does not include “electrical charging infrastructure [that] would need to be upgraded in order to provide sufficient charging capacity for the replacement equipment . . . the [estimated] cost of bringing new primary electrical service to a site would be \$750,000 to \$1 million per site.” (Page 38, under “Additional Infrastructure Costs”.)
- The Budget & Legislative Analyst’s April 22 Report to the Committee nowhere identifies the number or the locations of the new electrical charging stations that Rec & Park would need to be able to charge the new replacement electrical landscaping equipment – at \$750,000 to \$1 Million per copy.

Your Committee’s correspondence file on Item 22-0199 contains a Golf Superintendents trade association letter to the Board of Supervisors describing the

¹ AB-1346, California Legislative Information
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1346

technological and supply-chain unavailability of replacement equipment and the battery and charging station availability problems identified by the Budget and Legislative Analyst's Report, and concludes: "the technology and ability to mass produce and deliver this equipment and completely replace gasoline-powered equipment 25 hp and under by Jan. 1, 2024, on city owned property and Jan. 1, 2026, on private property is not feasible for commercial end users."²

As drafted, with its January 2024 and 2026 use-ban dates, the proposed ordinance is unrealistic. We recommend instead a ban on new sale of gas-powered equipment after January 2024, combined with additional information and a follow-up report on the information gaps and battery and charging infrastructure problems identified by the Budget and Legislative Analyst's Report. From that further study and report more practicable ban-on-use dates may emerge.

Respectfully,
San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

cc: Supervisor Myrna Melgar
Supervisor Connie Chan
Supervisor Catherine Stefani
Supervisor Matt Haney
Angela Cavillo, Clerk of the Board of Supervisors
Phil Ginsburg, Gen. Mgr., Recreation and Park Department
Kevin Teahan, Turf and Golf Section Manager, Recreation and Park Department
Recreation and Park Commission
Marc Connerly, Ex. Dir, GCSAA Northern California

² Letter to Board of Supervisors, Mar. 29, 2022, Golf Course Superintendents Association of America, Northern California Chapter, at p. 2: <https://sfgov.legistar.com/View.ashx?M=F&ID=10768013&GUID=6DBDA0CC-D1E6-4CCB-BB4A-25543996874D> (at pp. 2-3)

From: [SF Climate Emergency Coalition](#)
To: [Jalipa, Brent \(BOS\)](#)
Subject: Re: In Support of Healthier, Cleaner, Quieter Communities Act
Date: Sunday, April 24, 2022 6:50:08 PM

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Hi,

I noticed this did not make it into the file. Can you please add it and make sure it is included in the B&F committee agenda? File # 220199

Thank you.



[Website](#) | [Twitter](#)

On Tue, Apr 19, 2022 at 9:44 PM SF Climate Emergency Coalition <info@sclimateemergency.org> wrote:

Dear Members of the Budget & Finance Committee,

We are writing to you in strong support of Supervisor Melgar’s “Healthier, Cleaner, Quieter Communities Act,” and are urging your yes vote on this important legislation.

Gas-powered equipment is a major source of pollution that disproportionately affects communities of color. This legislation will ban gas-powered landscaping equipment and support replacement with clean electric equipment. Additionally, the last seven years have been the hottest on record. The U.N. has warned us that we are firmly on track toward an unlivable world and in a report revealed “a litany of broken climate promises” by governments and corporations, accusing them of stoking global warming by clinging to harmful carbon-based fuels. This legislation is a step forward in the twin goals of reducing greenhouse gas emissions and enhancing environmental justice.

Through the adoption of our City’s climate action goals, we have committed to phase out sources of pollution. Burning these fuels produces not just global pollution, but unhealthy local pollution as well. Workers using gas-powered tools are uniquely exposed and suffer lung and heart ailments from constant exposure. By requiring the transition to electric or manual tools, this legislation would help alleviate the unjust burden of pollution placed on this mostly immigrant workforce, and the resulting health care costs borne by their families and communities.

Further, all SF residents are exposed to the dangers of increased pollution from the use of

this equipment. According to the California Air Resources Board (CARB), smog-forming pollution from using a gas-powered leaf blower for 1 hour equals pollution from driving a car 1100 miles - the distance from San Francisco to Santa Fe. The smog-forming pollution emitted from a gas-powered lawn mower for one hour is equivalent to the pollution generated from driving an internal combustion engine car 300 miles. As we stop using gas-powered equipment and switch to cleaner alternatives, residents will benefit with reduced noise and air pollution in their neighborhoods.

This ordinance will prohibit the use of gas-powered landscaping equipment when there is an electric alternative available, and support the replacement of this equipment for micro and small businesses through a city-sponsored transition fund program, which covers:

- A Public Education Campaign^[L]_[SEP]
- Gas-Powered Small Engine Buy-Back Program^[L]_[SEP]
- Disposal of gas-powered equipment^[L]_[SEP]
- Wholesale Purchasing of equipment for City departments^[L]_[SEP]

In passing this legislation, we are taking a crucial step in implementing our Climate Action Plan goals and protecting the health of the workers who use this dirty, polluting equipment.

Invest in a greener, more sustainable San Francisco today!

San Francisco Climate Emergency Coalition



[Website](#) | [Twitter](#)

From: [Nancy Haber](#)
To: [Jalipa, Brent \(BOS\)](#); [Mar, Gordon \(BOS\)](#); [Ronen, Hillary](#); Asha.Safai@sfgov.org; [Melgar, Myrna \(BOS\)](#)
Cc: [Imperial, Megan \(BOS\)](#)
Subject: Support for FILE NO. 220199 - The Healthier, Cleaner, Quieter Communities Act
Date: Monday, April 25, 2022 9:45:24 PM

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Dear Budget & Finance Committee,

I write to you in strong support of Supervisor Melgar's "Healthier, Cleaner, Quieter Communities Act," and urge you to vote yes on this important legislation.

We are in the midst of a climate emergency which grows ever more dire. We also have increasing evidence of the terrible toll exacted on human health by air pollution and noise pollution and the greater the exposure, the more severe the health consequences. Through the adoption of our City's climate action goals, we have committed to phase out sources of fossil fuel pollution. This thoughtful legislation presents an opportunity to move forward effectively in making a just transition away from polluting energy to clean electric power.

This ordinance will prohibit the use of gas-powered landscaping equipment when there is an electric alternative available. It will support the replacement of this equipment for micro and small businesses through a city-sponsored transition fund program covering:

- A public education campaign
- A gas-powered small engine buy-back program
- Disposal of gas-powered equipment
- Wholesale purchase of equipment for City departments

Gas-powered equipment is a major source of pollution that disproportionately affects communities of color. Workers using gas-powered tools are uniquely exposed and suffer lung and heart ailments from constant exposure. Further, all SF residents are exposed to the dangers of increased pollution from the use of this equipment. According to the California Air Resources Board (CARB), smog-forming pollution from using a gas-powered leaf blower for 1 hour equals pollution from driving a car 1100 miles - the distance from San Francisco to Santa Fe. As we stop using gas-powered equipment and switch to cleaner alternatives, San Francisco

residents will benefit with reduced noise and air pollution in their neighborhoods.

In passing this legislation, we are taking a crucial step in implementing our Climate Action Plan goals and protecting the health of the workers who use this dirty, polluting equipment.

Invest in a greener, more sustainable San Francisco today!

Sincerely,

Nancy Haber 73 Hazelwood Ave San Francisco, CA 94112

From: [Melgar, Myrna \(BOS\)](#)
To: [Sarah Boudreau](#)
Cc: [Imperial, Megan \(BOS\)](#); [Jalipa, Brent \(BOS\)](#)
Subject: Re: Supervisor Melgar's Healthier, Cleaner, Quieter Communities Act
Date: Friday, April 22, 2022 11:32:18 PM

Thank you Sarah. Adding [@Jalipa, Brent \(BOS\)](#), Clerk of the Committee, so your comment can be included in the official file.

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From: Sarah Boudreau <boudreau.sarah.m@gmail.com>
Sent: Friday, April 22, 2022 8:50:35 AM
To: Ronen, Hillary <hillary.ronen@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>; Mar, Gordon (BOS) <gordon.mar@sfgov.org>; Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>
Subject: Supervisor Melgar's Healthier, Cleaner, Quieter Communities Act

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Hello Supervisors,

I couldn't figure out how to email in public comment for next week's meeting so I decided to email your offices directly. I wanted to say that I strongly support this legislation to ban gas-powered small engines. Gas-powered equipment is a major source of pollution; workers using such tools are uniquely at risk, suffering lung and heart ailments from constant exposure. By requiring (and financially supporting) the transition to electric or manual tools, this ordinance would help alleviate the unjust burden of pollution placed on this mostly immigrant workforce, and the resulting health care costs borne by their families and communities. I hope you will support it!

Thanks,

Sarah Boudreau, West Side SF Resident & Climate Action Supporter

--

Sarah Boudreau

she/her

boudreau.sarah.m@gmail.com

www.linkedin.com/in/sarahboudreau



March 29, 2022

City and County of San Francisco
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA. 94102

Subject: Opposition to Administrative, Police Codes - Ban on Gas-Powered Landscaping Equipment

Dear City and County of San Francisco Board of Supervisors:

On behalf of the Golf Course Superintendents Association of Northern California (GCSANC) and our member facilities in the City and County of San Francisco, please accept the following comments in opposition to Administrative, Police Codes – Ban on Gas-Powered Landscaping Equipment.

California Assembly Bill 1346 and the recent amendments by the California Air Resources Board (CARB) that will require most newly manufactured small off-road engines such as those found in leaf blowers, lawn mowers and other equipment be zero emission starting in 2024 (with no future restrictions on gas-powered equipment purchased before Jan. 1, 2024) should not supplant city/county ordinances.

San Francisco golf facilities are end users of many of the products that will be affected by the complete curtail of gasoline powered equipment 25-hp and under starting in 2024 (city and county property) and 2026 (all City and County of San Francisco). Some of these products used on golf courses include chainsaws (<45cc), handheld grass and hedge trimmers, handheld and backpack leaf blowers, handheld pole pruners, handheld and ground supported edger's, walk behind and riding greens mowers, select fairway mowers, generators, verti-cutting and aerator units and pressure washers.

While select pieces of zero emission equipment (ZEE) may meet commercial needs by January of 2024, numerous others will not; they will require considerable additional technological tweaking before they are likely to meet the "fit for intended use" standard. The current ZEE available to commercial users poses infrastructure and cost/performance issues including limited battery life (frequent recharges), charging infrastructure challenges, durability/shelf-life problems, lack of maintenance support, and incapacity (power of ZEE) to complete large golf course maintenance and landscape tasks.

From a cost perspective, a complete transition is a significant impediment for the golf and landscape industry, specifically to undertake in less than two years. Data from manufacturers shows that commercial ZEE can have an upfront cost of as much as 2 to 4 times that of their gas-powered counterparts:

- One popular manufacturer's commercial-grade electric leaf blower retails for approximately \$350 - \$400, similar to the same manufacturer's gas-powered

**2235 Park Towne Cir., 2nd Floor
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www.gcsanc.com**

unit. However, to use this electric leaf blower for an entire workday requires the purchase of extra batteries and chargers thus, driving the up-front cost to exceed \$2,000.

- One of the most popular commercial gas-powered riding mowers cost ranges from approximately \$10,000 to \$11,000 while its ZEE counterpart cost starts at approximately \$21,000 (all prices MSRP).
- A commercial grade gas-powered string trimmer from a leading manufacturer starts at \$329 but a commercial grade battery-powered unit from the same manufacturer (including the extra batteries and chargers needed to complete a day's work) exceeds \$1,000.

Even more problematic, the majority of these commercial ZEE products are currently not available due to issues with technology, manufacturing/supply chain and delivery infrastructure caused by the Covid 19 pandemic and current political strife, and the repair of commercial grade ZEE equipment is woefully inadequate to service the future needs of large landscape users.

GCSANC understands the need to develop an emission reduction strategy to reduce pollution and noise in the state. As a commercial user, we recognize that the green industry will continue to move to lines of zero emission equipment in the future and that these lines offer numerous benefits, including healthier working environments, lower maintenance costs, reduced noise, reduced environmental impacts and reduced fuel costs.

However, the technology and ability to mass produce and deliver this equipment and completely replace gasoline-powered equipment 25 hp and under by Jan. 1, 2024, on city owned property and Jan. 1, 2026, on private property is not feasible for commercial end users.

GCSANC requests that the City and County of San Francisco follow the rulemaking process introduced by CARB on Dec. 9, 2021, that bans the manufacturing and sale of most small off-road engines by Jan. 1, 2024, but continues to allow use for those products manufactured and sold (including used equipment purchases) before that date. This will allow golf course superintendents and other commercial end users the opportunity to continue to use their current equipment while starting the process of integrating ZEE into their operations as it becomes more technologically feasible and available.

We thank you for your time and consideration and please let us know if you would like to speak with a superintendent in the San Francisco area to discuss the potential implications of this ordinance on the success of their operation.

Sincerely,



Marc Connerly, Executive Director

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From: [Paul Wermer](#)
To: [Jalipa, Brent \(BOS\)](#); [Ronen, Hillary](#); [Safai, Ahsha \(BOS\)](#); [Mar, Gordon \(BOS\)](#); [Melgar, Myrna \(BOS\)](#)
Cc: [Imperial, Megan \(BOS\)](#); [Chan, Connie \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Haney, Matt \(BOS\)](#)
Subject: Support with amendments for FILE NO. 220199 The Healthier, Cleaner, Quieter Communities Act
Date: Friday, April 22, 2022 12:07:11 PM

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Dear Budget & Finance Committee,

I would like to thank Supervisor Melgar and cosponsors, Supervisors Mar, Haney, Chan and Stefani, for introducing The Healthier, Cleaner, Quieter Communities Act.

The findings speak for themselves - though perhaps go too easy on the adverse health impacts from air quality degradation and excessive noise. The ordinance requirements are reasonable and beneficial, and should reduce the operating cost to the landscaping companies.

The outreach by Supervisor Melgar's office has been excellent, and in particular very responsive to questions and concerns.

We are all agreed that there are adverse health impacts. Given that, all effort should be made to implement as soon as is practical. For this reason I request 2 changes:

Request 1: Currently the language exempts agreements contemplated before 1/1/2024. Sec 12E1, Definitions, p5, line 18 excludes "Agreements advertised, solicited, or initiated" before 1/1/2024. This means that any multi-year contract where discussion began in 2022 or 2023 is exempt for the term of the contract, even if that contract is signed in 2024. This is a matter that the City has full control over, and I urge this date be 1/1/23, with the full understanding that any limitation on the use of gas powered equipment does not occur before 1/1/24. This ensures any person contemplating a contract with the city in 2023 understands that they must transition fully to electric equipment by 1/1/24. This is ample time for any company to convert, and the directors power to grant exemptions should be able to resolve problems.

Request 2: Sec 2102, p8, line 16 implements the ban on privet use 1/1/2026. Please pull in the Police Code implementation to 1/1/2025 – we do not need 3 years to educate the public, and much of the publicity informing home owners and small businesses will be forgotten by 2025. It would be even better if the buyback or exchange program commenced in FY2023/24, to enable landscaping contractors to fully convert as soon as possible.

Sincerely,
Paul

--
Paul Wermer

2309 California St
San Francisco, CA 94115

paul@pw-sc.com