

COALITION FOR

CLEAN AIR

SD-SEQUEL

San Diegans for Sustainable, Equitable & Quiet Equipment in Landscaping



**Union of
Concerned
Scientists**

November 29, 2021

Re: Adopt Small Off-Road Engine Rule Implementing AB 1346 (Berman & Gonzalez)

Dear Members of the Air Resources Board:

Our organizations urge you to adopt the proposal to reduce pollution from Small Off-Road Engines (SORE) at your December meeting without any weakening amendments. These regulations implement legislation enacted this year (AB 1346, Berman & Gonzalez) and also advance Governor Gavin Newsom's Executive Order N-79-20, which includes the goal of making all off-road engines zero emission by 2035.

The transition to zero emission equipment for SORE is necessary to protect the health of workers and residents and support attainment of health-based clean air standards. California is home to the nation's most difficult air pollution challenges, with mobile sources of pollution by far the leading contributor to unhealthy air in the state. Our cars, trucks, buses and off-road equipment such as lawn mowers, leaf blowers and generators are all important pollution sources to assess and reduce. Our state risks losing future federal funding if we continue to fail to meet national air quality standards. California's leading clean air programs have spurred innovation for decades and must continue to seek new pathways to clean, healthy air for all residents.

Updating the SORE requirements to reflect the latest data, shifting market and emissions inventory is critical to CARB's mission. **As noted by CARB, emissions of combined ozone-forming reactive organic gases (ROG) and oxides of nitrogen (NOx) from the SORE category now surpass emissions from all of California's cars.** CARB has also found high failure rates in evaporative emissions testing of SORE, preventing previously claimed emission reductions from being realized.

Given the combination of exhaust and evaporative emission impacts from this sector and evidence of failure rates, coupled with the growing availability of zero emission options today, **we strongly support the proposal to bring exhaust and evaporative emission standards to zero in 2024 for all SORE except for generators**, a timeline that is technically feasible and brings significant benefits. We are concerned by the proliferation of petroleum-fueled generators, which cause significant air pollution, and urge CARB to seek ways to make all new-generator sales zero-emission sooner than the proposed 2028.

According to CARB's own research, operating gas-powered equipment has significant air quality and occupational impacts:

- One hour of operation for a gas-powered mower generates emissions equivalent to driving a 2017 Toyota Camry from Los Angeles to Las Vegas;
- One hour of operation from the best-selling leaf blower generates emissions equivalent to driving from Los Angeles to Denver;
- Long-term exposure to certain exhaust compounds emitted by gasoline powered lawn and garden equipment may increase cancer risk by up to 80 excess cases per one million operators exposed.

Despite widespread adoption of zero emission technology at the household level, commercial users are slower to transition, making a forward-looking rule necessary. While these regulations do not prohibit the use of polluting equipment, they do propose ending the sale of new gas-powered equipment.

Fortunately, this year's budget has appropriated \$30 million to distribute to small-business landscapers and help them begin to acquire and transition to new zero emission electric and manual equipment. In addition, many air districts and utilities around the state operate buyback and incentive programs.

We appreciate that CARB staff have brought forward new strategies to reduce the impacts of SORE, and we ask the Board to take action now to protect the health of local residents, workers, children and all who are breathing unhealthy air.

Respectfully Submitted,

Bill Magavern
Coalition for Clean Air

Wes Reutimann
ActiveSGV

Matthew Baker
Planning and Conservation League

Caro Jauregui
California Walks

Erin Rodriguez
Union of Concerned Scientists

Ameen Khan
California Environmental Voters

Ron Askeland
SD-SEQUEL