



December 9, 2021

Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

## RE: Health Support for Proposed Small Off-Road Engine Rulemaking

Dear Chair Randolph and Board Members,

On behalf of the undersigned health and medical organizations, we write to express our support for the proposed Small Off-Road Engine (SORE) rulemaking amendments and call on the California Air Resources Board (CARB) to approve this rule to reduce harmful emissions from gas-powered leaf blowers, lawnmowers, and generators. These regulations will improve public health and are consistent with the goals outlined in Governor Newsom's Executive Order N-79-20 directing CARB to achieve 100 percent zero emissions from off-road equipment in California by 2035.

The American Lung Association's [State of the Air 2021](#) report found that California is home to seven of the ten most ozone-polluted cities in the United States and six of the ten most impacted by particle pollution. Currently, gas-powered SORE equipment emits more smog-forming pollution than light-duty vehicles and are projected to double passenger vehicles in 2031 without the proposal. SORE equipment directly impacts the health of workers and the communities they work in by emitting toxic air contaminants, fine particle pollution, Nitrogen Oxides (NOx), and other smog-forming pollutants. These emissions cause human health impacts, including breathing problems, asthma attacks and other lung health issues, cardiovascular issues, and premature deaths.

The proposed transition of SORE to zero-emission equipment (ZEE) starting on January 1, 2024, will reduce harmful engine exhaust and represents a major step forward for local air quality. As of 2024, new lawncare equipment sold in California would be required to have zero emissions, with later implementation for generators. If approved, the SORE rule will reduce an estimated 59,307 tons of NOx and 423,240 tons of Reactive Organic Gases (ROG) from 2023 through 2043 to support efforts to attain health-protective air quality standards. In addition, there will be major human health benefits, including:

- \$8.8 billion in monetized health benefits
- 892 lives saved from premature deaths
- 438 emergency room visits for asthma
- 311 reduced hospitalizations for respiratory and cardiovascular issues

CARB's own proposal notes that the above figures only represent a subset of the overall health benefits possible with rule implementation. California must continue to prioritize regulations that protect human health, and we applaud CARB for continuing to update emissions inventories and requirements as technologies mature.

The Legislature and the Governor have shown strong support to reduce emissions from this category by passing and signing Assembly Bill 1346 (Berman and Gonzalez) into law. In addition, the Legislature and the Governor further supported implementation by providing a \$30 million budget allocation to CARB for incentives. Lastly, at the November CARB meeting, the Board approved the Fiscal Year 2021 - 22 funding plan for clean transportation incentives, including SORE equipment incentives to accelerate the transition in advance of the 2024 implementation date.

For these reasons, our organizations request that the Board approve the SORE rule amendments to reduce criteria air and climate pollutants. Please contact Mariela Ruacho at [Mariela.Ruacho@lung.org](mailto:Mariela.Ruacho@lung.org) with any questions.

Sincerely,

Karmi Ferguson, Executive Director  
**American Academy of Pediatrics, California**

Mark Noah, MD, FACP, President  
**American College of Physicians California Services Chapter**

Mariela Ruacho, Manager, Clean Air Advocacy  
**American Lung Association**

Edgar Aguilar, Chair  
Carlos Bello, MPH, CHES, Treasurer  
Asha Chandy, Communications Coordinator  
**Asthma Coalition of Kern County**

Marc Carrel, President & CEO  
**BREATHE Southern California**

Justin Malan, Executive Director  
**California Conference of Directors of Environmental Health**

Yvonne Choong, Vice President, Center for Health Policy  
**California Medical Association**

Vipul V. Jain, MD, MS, President  
**California Thoracic Society**

Linda Rudolph, MD, MPH, Director  
**Center for Climate Change and Health  
Public Health Institute**

Kevin Hamilton, RRT, Executive Director  
**Central California Asthma Collaborative**

Rachelle Wenger, System Vice President, Public Policy & Advocacy  
**Dignity Health**

Catherine Dodd, PhD, RN, Advisor  
**Families Advocating for Chemical and Toxics Safety (FACTS)**

Praveen Buddiga, MD, FAAAAI  
**Family Allergy Asthma Clinic (Fresno)**

Robyn Rothman, JD, Associate Director, State Policy Programs  
**Health Care Without Harm**

Lynn Kersey, MA, MPH, CLE, Executive Director  
**Maternal and Child Health Access (Los Angeles)**

Robert M. Gould, MD, President  
**San Francisco Bay Physicians for Social Responsibility**

Harry Wang, MD, President  
**Physicians for Social Responsibility – Sacramento**

Juliet Sims, MPH, Associate Program Director  
Vince Leus, Program Coordinator  
**Prevention Institute**

Joel Ervice, Associate Director  
**Regional Asthma Management and Prevention (RAMP)**

Jim Mangia, MPH, President & CEO  
**St. John's Well Child and Family Center (Los Angeles)**

**Health Professionals for Clean Air and Climate Action**

David Pepper, MD

Catherine S. Forest, MD, MPH, FAAFP

Michael J. Welch, MD

Armen Ter-Barseganyan, MPH, CHES

George Meyer, MD

Marc Futernick, MD

Maya Heinert, MD