



July 28, 2023

**Support for California Small Off-Road Engine (SORE) Amendments Waiver**

Re: Docket ID No. Docket EPA–HQ–OAR–2023–0151

Comment from the American Lung Association

Via email: [a-and-r-docket@epa.gov](mailto:a-and-r-docket@epa.gov)

The undersigned California-based health and medical organizations call on the United States Environmental Protection Agency (EPA) to approve California’s waiver to implement recent amendments to the Small Off-Road Engines (SORE) regulation. The California Air Resources Board (CARB) amended the SORE standards to ensure cleaner and zero-emission technologies become the norm for this highly polluting sector. The rule amendments are an important piece of CARB’s strategy to meet health-protective National Ambient Air Quality Standards (NAAQS).

Californians face the most difficult air pollution challenges in the United States. The American Lung Association’s “State of the Air” 2023 report found that California is home to six of the ten most ozone-polluted cities in the United States, including the top four.<sup>1</sup> Despite decades of progress in reducing air pollution, Californians still face risks associated with unhealthy air, including asthma attacks, strokes, heart attacks, lung cancer and premature death. Low-income communities and communities of color face disproportionate burdens and disparities in health impacts. SORE equipment, including lawn and garden tools, pressure washers and small

<sup>1</sup> American Lung Association. State of the Air 2023. April 2023. [www.lung.org/sota](http://www.lung.org/sota).

generators, puts workers and communities at risk and represents a growing share of California's ozone-forming pollution burden.

The proposed transition of SORE to zero-emission equipment starting in 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 by 2028. 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 through 2043, 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

It is important to note that CARB acknowledges that the above figures only represent a subset of the overall health benefits possible with rule implementation.<sup>2</sup>

The amended SORE regulations are also critical to California achieving its broader air pollution reduction requirements. The amended regulations, adopted by CARB in 2016 and 2021, were included in the Revised 2016 State Implementation Plan (SIP) to support attainment of health-protective NAAQS.<sup>3</sup> Approval of the waiver and implementation of the SORE amendments is appropriate and necessary, as this equipment is a growing source of ozone-forming emissions, and real-world emissions are not well-controlled under current policies. According to the CARB emissions inventory, SORE equipment surpassed the ozone-forming emissions of all the passenger vehicles in California by 2021. Without implementation of the amendments, SORE emissions are projected to double those of passenger vehicles as of 2031. CARB estimates that the operation of a standard commercial leaf-blower produces the equivalent of ozone-forming emissions to driving a standard sedan 1,100 miles, or roughly Los Angeles to Denver.<sup>4</sup> The deployment of zero-emission equipment is needed to achieve SIP commitments and to reduce occupational and community exposures to harmful pollutants.

Health and medical organizations participated in two robust public processes involved in developing the most recent SORE amendments.<sup>5</sup> Both CARB (2021 amendment approval) and the California Legislature (Assembly Bill 1346, Berman and Gonzalez) approved the pathway to the SORE amendments that are now subject to the waiver consideration by US EPA. Further, the Legislature and Governor Newsom approved \$30 million in incentive funding for an accelerated transition to zero-emission landscaping equipment via the 2019 state budget process, and local air districts are also able to offer incentives to support the transition to cleaner SORE equipment.

To ensure that California continues to make progress toward attainment of health-protective air quality standards, and to protect the health of workers and communities throughout California, we urge the US EPA to approve the waiver for the amendments to the California SORE

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<sup>2</sup> CARB. Public Hearing to Consider Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions Staff Report: Initial Statement of Reasons at page ES-5, and pp. 73-74. October 2021.

<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/sore21/isor.pdf>

<sup>3</sup> California Air Resources Board. Revised 2016 State Strategy for the State Implementation Plan at pp. 115-116. March 7, 2017.

<https://ww2.arb.ca.gov/sites/default/files/classic/planning/sip/2016sip/rev2016statesip.pdf>

<sup>4</sup> CARB, Small Off-Road Engines in California Fact Sheet. 2021. [https://ww2.arb.ca.gov/sites/default/files/2021-12/2021\\_SORE\\_Fact\\_Sheet.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-12/2021_SORE_Fact_Sheet.pdf)

<sup>5</sup> California Health and Medical Community letter supporting SORE adoption. December 2021. [Health-Group-SORE-Sign-On-Letter\\_Final\\_Updated-12-9-2021.pdf](https://www.lung.org/health-group-sore-sign-on-letter-final-updated-12-9-2021.pdf) (lung.org)

regulation. Please contact William Barrett with the American Lung Association at [William.Barrett@Lung.org](mailto:William.Barrett@Lung.org) for any additional information.

**Submitted by:**

Alliance of Nurses for Healthy Environments

American College of Physicians California Chapter Services

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ANA\California

Asthma Coalition of Kern County

Asthma Coalition of Los Angeles County

Breathe California of the Bay Area, Golden Gate and Central Coast

Breathe California Sacramento Region

Breathe Southern California

BUDDIGA Family Allergy Asthma Skin Immunology

California Medical Association

California Society for Respiratory Care

Center for Climate Change and Health

Central California Asthma Collaborative

LifeLong Medical Care

Maternal Child Health Access

National Association of Hispanic Nurses, Golden Gate Chapter (San Francisco Bay Area)

Pacifica Family Maternity Center

Physicians for Social Responsibility/Sacramento

Prevention Institute

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