

As Prepared for Delivery
Comments of William Barrett
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On
The U.S. Environmental Protection Agency
California Small Off-Road Engine Waiver
Docket ID No. EPA-HQ-OAR-2023-0151
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Good morning. I am Will Barrett, National Senior Director for Clean Air Advocacy with the American Lung Association.

California is home to extraordinary air pollution burdens, with 98 percent of residents living in a community that earned a failing grade in the American Lung Association's State of the Air 2023 report. Six of the Ten most ozone-polluted cities in America are in California, including Sacramento where I'm joining from today.

Because of the opportunity to address a major source of harmful pollution, I spent significant time on the California legislation and Air Resources Board (CARB) regulations that led to this waiver consideration. The American Lung Association is calling on the US EPA to approve the waiver as a critical public health step without delay.

That is because Small Off-Road Engine (SORE) equipment is a growing source of the ozone-forming emissions inventory and real-world emissions are not well-controlled under current policies; because California hosted a robust public process to meet its standards under the Clean Air Act; and because commercial readiness continues to grow for both zero-emission technologies and the cleaner combustion elements of these lifesaving rules.

Approving the waiver for the amended standards will benefit the health of workers and the communities they work in. These emissions cause a wide range of human health impacts, including breathing problems, asthma attacks and other lung health issues, cardiovascular issues, and premature deaths.

When CARB approved the most-recent amendments to the SORE standards in 2021, that capped several years of public process to meet SIP commitments for attainment of Ozone NAAQS.

That process saw the widespread participation by health and medical voices, industry voices, workers and others. As you have heard, the robust public deliberation and careful consideration of the policy was also carried out through the California Legislature which not only endorsed this process, but also invested tens of millions in incentives for a more rapid transition to zero-emission technologies.

The American Lung Association was one of over 20 health and medical organizations involved in the public process because of the clear lung health implications of cleaning up this major source of harmful pollution.

1. SORE represents a greater share of smog-forming emissions than passenger vehicles in California.
2. Without the most-recent amendments adopted by CARB, SORE emissions are projected to double that of passenger vehicles in 2031.
3. Zero-emission SORE technology exists today and millions in public funding has been distributed to support the transition.

In closing, the American Lung Association urges the US EPA to grant this waiver and to look for opportunities to establish stronger national standards to protect health beyond California.

Thank you.