

June 30, 2020

Dr. Dorothy Fibiger
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Advancing Proposed Zero Emission SORE Standard

On behalf of the American Lung Association, I am writing to comment on the Small Off-Road Engine (SORE) rulemaking proposal following the June staff workshop. The American Lung Association wishes to thank the board for its attention to this area of growing concern and urge earlier action to accelerate the air quality benefits of the proposed zero emission standard for this sector.

According to the American Lung Association's [State of the Air](#) 2020 report, California remains home to the most difficult air pollution challenges in the United States. The State is home to seven of the ten most ozone-polluted cities in America, including the top six (Los Angeles, Visalia, Bakersfield, Fresno, Sacramento and San Diego; the SF Bay Area ranks eighth). California cities also dominate the lists of most impacted by particle pollution. Unfortunately, 98 percent of Californians live in counties affected by poor air quality, and we know that many residents are more vulnerable to the effects of polluted air. Children, seniors, low income communities, communities of color and others face [increased risk of lung and heart health impacts](#) including asthma attacks, impacts to lung function and development, lung cancer, and even premature death.

Based on the updated emissions inventory presented by staff, the SORE category has already surpassed the on-road light duty passenger vehicle segment as the dominant source of smog-forming NO_x and ROG in the state. The June 9th workshop on the proposal also noted that over half of household SORE equipment is already zero emissions, but commercial interests are lagging in adoption. Stronger standards that reduce this significant burden on our air and health are warranted:

- The Lung Association recommends moving the proposed zero emission SORE standard up to 2023 (from 2025) to broaden commercial uptake and accelerate the public health and air quality benefits of this transition.
- Further, we recommend strengthening provisions related to product durability credits and compliance penalties to avoid delays in the transition to zero emission equipment and ensure strong compliance and reliability signals are central to the final rule.

We look forward to ongoing engagement with the staff and board as you continue to work through the proposal in the coming months. Thank you for your attention to our comments.

Sincerely,



Will Barrett
Director, Clean Air Advocacy