



**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 • Sacramento, CA • 95812 • (916) 444-0022

December 23, 2019

Catherine Dunwoody  
Chief, Monitoring and Laboratory Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Request for Alternative Strategies to Reduce Emissions from Small Off-Road Engines

Dear Ms. Dunwoody:

On behalf of the Environmental Council of Sacramento, we are writing to provide input in response to the California Air Resources Board's Solicitation for Alternative Strategies to Reduce Emissions from Small Off-Road Engines (SORE) issued on November 19, 2019. We support the pursuit of alternatives and incentives to require the transition to zero emission technologies as soon as possible.

According to the CARB fact sheet on SORE, operating gas-powered equipment has significant air quality impacts. We view the transition to zero emission equipment for the SORE category necessary to eliminate harmful pollution, support attainment of clean air standards and protect the health of workers and residents in Sacramento. CARB research in 2018 found that 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.

We encourage the staff to evaluate a more rapid transition to zero emission requirements through the proposed rulemaking.

Sincerely,

*Ralph Propper*

*President, Environmental Council of Sacramento*