



May 13, 2022

Ryan Fogle
ENERGY STAR Manager
United States Environmental Protection Agency
Climate Protection Partnerships Division
1200 Pennsylvania Ave NW, Washington, DC, 20460 US

Via email: electricyard@energystar.gov

Re: ENERGY STAR rating for electric yard equipment

Dear Mr. Fogle,

The American Lung Association writes in response to the request for comment on the US Environmental Protection Agency's (US EPA) proposed development of an ENERGY STAR rating for zero-emission lawn care equipment. We support this action as a pathway to greater consumer awareness of zero-emission equipment and as a step toward the near-term development of zero-emission technology standards for this equipment category.

Today, over 137 million Americans live in communities impacted by unhealthy air quality, according to the American Lung Association's "State of the Air" 2022 report.¹ This report highlights that communities across the United States face too many days, weeks and even months of unhealthy ozone and/or particle pollution. These widespread pollutants contribute to asthma attacks, heart attacks and strokes, and premature death. Breathing particle pollution can also cause lung cancer. These impacts threaten the health of children, seniors, those living with heart or lung illnesses, lower-income communities and communities of color. In fact, "State of the Air" 2022 found that a person of color in the United States is 61 percent more likely to live in a community with unhealthy air and 3.6 times more likely than a white person to live in a community with the most polluted air.

An economy-wide transition to zero-emission technologies is critical to protecting public health. Creation of an ENERGY STAR rating is a good first step for US EPA to inform consumers and businesses of the availability, utility and performance of these widely available technologies. US EPA should concurrently work to develop zero-emission standards for all lawncare equipment to further drive the market toward cleaner, healthier technologies that do not pollute. The California Air Resources Board's (CARB) recently adopted zero-emission lawncare equipment requirements should act as an important resource – and model - for US EPA. Through that rulemaking, CARB clearly illustrated the scope and scale of the impacts caused by small-engine emissions and the benefits of moving to zero-emission engines:

¹ American Lung Association. State of the Air 2022. April 2022. www.lung.org/sota

- Small off-road engines now contribute more smog-forming pollution than passenger cars in California and are projected to produce double the smog-forming emissions of passenger cars by 2031.
- CARB also notes that running a gas-powered leaf-blower for just “one hour of operation emits smog-forming pollution comparable to driving a new light-duty passenger car about 1100 miles – about the distance from Los Angeles to Denver, over 15 hours of driving.”²
- CARB amended the Small Off-Road Engine standards in 2021 to require all new sales of lawncare equipment to be zero-emission by 2024 (and for small generators to be zero-emission by 2028), which will generate \$8.8 billion in public health benefits and save approximately 900 lives through 2043.³

We encourage US EPA to use the ENERGY STAR program to highlight the best-in-class equipment for consumers and commercial entities, and to move toward establishing a zero-emission standard for lawncare equipment in line with the California standards. Please contact me with any questions at William.Barrett@lung.org.

Thank you for considering our perspectives,



Will Barrett
National Senior Director, Advocacy, Clean Air

² California Air Resources Board. SORE-Small Engine Fact Sheet. October 2021. <https://ww2.arb.ca.gov/resources/fact-sheets/sore-small-engine-fact-sheet>

³ California Air Resources Board. Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions. Initial Statement of Reasons. October 2021. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/sore21/isor.pdf>