



December 7, 2021

San Diego Air Pollution Control District Governing Board
10124 Old Grove Road
San Diego, CA 92131

Re: Establishing an APCD Program for Trade-In or Buy-Back of Gasoline-Powered Leaf Blowers.

Honorable Board Members:

San Diegans for Sustainable, Equitable and Quiet Equipment in Landscaping (hereafter SD-SEQUEL) was formed earlier this year to advocate for the enactment of an equitable ban on gasoline-powered leaf blowers in all jurisdictions of San Diego County in order to protect the environment and the health of landscape workers and the public. SD-SEQUEL is a coalition representing the views of numerous organizations, including the San Diego Sierra Club, Clean Earth for Kids, San Diego Climate Reality Project, SD350, and other climate advocacy groups and concerned citizens.

Governor Newsom recently signed AB 1346 with the goal of eliminating gasoline-powered small off-road engines (SOREs), including those used in landscaping equipment. The new law requires that by July 1, 2022, the California Air Resources Board (CARB) adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines. AB 1346 requires the California Air Resources Board to prohibit the sale and manufacturing of SOREs by January 2024, or as soon as CARB determines it technologically feasible, whichever is later. The State has authorized a budget of \$30 million for programs to eliminate gas-powered SOREs. CARB will establish criteria for dispensing these funds.

SD-SEQUEL applauds enactment of AB 1346 and the funding to facilitate elimination of the use of existing equipment. However, SD SEQUEL believes it is inequitable for landscape contractors alone to bear the costs of conversion to electric equipment. Many landscape contractors are independent operators who do not have the resources to make the transition, and many are members of communities of concern. Moreover, we all benefit from the conversion.

To address this inequity in San Diego, SD-SEQUEL supports incentives such as trade-in and buy-back programs that make it possible for small landscape operators to transition to electric equipment. Specifically, we urge the APCD Board to adopt a policy asking staff to develop an exchange program whereby gas-powered leaf blowers could be exchanged for electric blowers

that emit noise levels no greater than 65 dBA, and a buy-back program for those who are willing to operate without gas-powered leaf blowers. The Board should also direct staff to work with CARB to apply for funding for such programs and to develop the details of these programs for consideration by the Board.

The establishment of such a program would facilitate adoption of ordinances by local governments to ban the use of gas-powered leaf blowers. SD SEQUEL has already drafted such an ordinance and discussed it with staff of San Diego City Councilmembers and County Supervisors. As drafted, enforcement of the ordinance can only be triggered once there is a trade-in or buy-back program, and a first violation would result in a "fix-it" ticket, referring the user to the details of a buy-back/trade-in program.

The air districts in Los Angeles, Bay Area, and San Joaquin Valley already have [programs in place to encourage the transition from gasoline to electric lawn equipment](#). In the past, the San Diego APCD operated a trade-in program for gas-powered lawn mowers.

The negative environmental and health impacts of gas-powered leaf blowers are well documented. The California Air Resources Board (CARB) reports that the smog-forming pollution from running a commercial gas-powered leaf blower for one hour is comparable to driving a 2017 Toyota Camry for 1,100 miles. Already in 2021, leaf blowers and other small off-road gas engines are expected to produce more ozone pollution than all passenger vehicles in California. The dust stirred up by leaf blowers contains anything from pollen, mold, animal feces, and heavy metals to chemicals from herbicides and pesticides. This increases the risk of asthma, cardiovascular disease, lung cancer, premature birth, and other severe health conditions. Noise from leaf blowers can cause hearing loss and is especially harmful to landscape workers, older persons, children, and people with autism.

Elimination of gas-powered leaf blowers will help to reduce greenhouse gases, protect the health of landscape workers and the public, and reduce noise pollution in neighborhoods throughout the County.

We ask to be notified of any updates regarding the creation of trade-in and buy-back programs by this District and stand ready to assist your staff in any way we can.

Thank you for your time and consideration.

Very Truly Yours,

Jan Chatten-Brown
SD-SEQUEL Finance Committee
<http://sd-sequel.org>

Attachment: Draft Ordinance