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August 28, 2019

Ms. Heather Heinks
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno, CA 93726

Re: Draft CERP; South Central Fresno
August 14, 2019

Via email: heather.heinks@vallleyair.org

Dear Ms. Heinks:

The following are my comments to the Draft Community Emissions Reduction Program:
Page 94, 2nd para from the bottom says: "The District does not have the authority to regulate the use of leaf blowers or other lawn and garden equipment operating throughout the Valley."
What I understand is the District can regulate the emission from the engine but not the what they spew into the air in our local neighborhoods, schools, parking lots, commercial properties and public spaces.

Perhaps some improvements on engine exhaust are being made with the California Air Resources Board regulations on small engines, "SORE" for short, but this does not solve the health threat of airborne fugitive dust created by leaf blowers. Battery operated devices have been in development over the past several years, but I have never seen one used by the landscaping crew on the condo development where I live in Central Fresno. They also don't hold a charge long and probably don't have a nozzle air speed over 200 mph, like gas-driven units.

<https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore>

I believe that science has shown that breathing the PM stirred up by leaf blowers can cause asthma in children and early mortality in older people. The PM also leads to more deadly lung infections and neurological diseases when the PM goes through the lungs and enters the blood stream, traveling throughout the body.

Regulation VIII covers Fugitive Dust, but gardening equipment is not covered. Leaf blowers should be added to this category and added to emissions inventory. The blown PM from leaf blowers might not register on area monitors as well as construction, demolition and excavation activities with waves of dust, but the health risks are present. Leaf blowers might not throw up a cloud over the city in order to register on existing monitors, however blowers are used for more than blowing leaves and they are more of a local neighbor by neighborhood threat rather than a large single area threat to public health. Leaf drop lasts for 3 to 4 months, whereas blowers operate year-round, to mainly blow dust to disperse and displace it for the moment. Commercial landscapers use blowers to make their job faster and easier than sweeping, raking, gathering and disposing of the debris. Going slower would keep the cloud of dust under greater control and lower to the ground. Blowers seem to be used on "full-power" and raise the

dust 30 to 40 feet above the ground, better able to enter homes and other residences, parked and moving vehicles, commercial and government buildings, through and around windows, front doors, garage doors, swamp coolers etc.

www.quietcommunities.com , according to their website, is a national organization that says “Our mission is to transition landscape maintenance to low noise, zero emissions practices with positive solutions to protect the health of workers, children, the public and the environment. One of their articles online is:

<https://www.quietcommunities.org/wsj-article-doesnt-explain-distress/>

It speaks to the noise and exhaust emissions of gas powered leaf blowers but also mentions the industry growth over the past years, where over a year ago it states there were “...over 40 million pieces (of gardening equipment) now operating in the US- one for every 8 Americans.” It then mentions “...the pesticides, fertilizers, etc, they disperse into the air.” The Outdoor Power Equipment Institute is the industry’s main trade/lobbying group that pushes back on legislation on gardening equipment. Quiet Communities, Inc. says that “The outdoor power equipment industry recommends only one gas leaf blower be used at a time, never at full throttle in residential areas, and not for moving dust. But this is rarely the case.”

Leaf blowers are archaic: Who in their right mind would use leaf blowers to clean inside their home? Alan Kandel, a local blogger on science issues agrees:

<https://alankandel.scienceblog.com/2019/08/27/willy-nilly-careless-dust-blowing-like-sweeping-dirt-under-the-rug/>

Leaf blower options:

Sweep, rake pick up and dispose or vacuum with well-regulated filters for PM2.5.

Ban Fireworks:

The main objection is that many organizations raise funds for their activities for the year with sales of fireworks for the 4th of July. The PM spikes when these are ignited, usually for two weeks around the 4th and 2 weeks leading up to New Year’s. This is also a nightly activity during baseball season in downtown Fresno.

Option:

Many of the fundraising concerns are churches or other tax-exempt associations. They can raise funds in other ways, by passing-the-hat or by selling some other safe and sane, non-harmful product.

Sincerely,

Larry Taylor, Resident Member AB617 South Central Fresno Steering Committee