

February 16, 2018

**Moderator Carmin C. Reiss
and
Town Selectmen
Concord, MA**

RE: <http://concord.wickedlocal.com/news/20180130/effort-to-ban-gas-powered-leaf-blowers-in-concord>

Moderator Reiss:

I see that Scott Richardson has introduced another petition, this time to ban leaf blowers. He seems to be quite successful with this approach, succeeding with two earlier petitions according to the above Internet article. Not to be critical of the system, I can see why this is happening. The turnout for town meetings has not been very good at only [3.64% of registered voters](#). It is hard to believe that this would be a true representation of the community's will.

I am a former Vice President of Engineering for Echo Inc., a leading manufacturer of powered lawn care products, including leaf blowers. I have helped more than 160 communities enact reasonable and effective leaf blower regulations. More information on my qualifications can be found at the following websites. <http://leafblownoise.com/about%20the%20author.pdf>
<http://leafblownoise.com/List%20of%20cities.htm>

You are probably wondering why I am interested in Concord's voting procedure. Well, it is not the system under which laws are created in your city that concerns me, rather it is the outcome of this particular petition that I am troubled with. For one thing, a leaf blower ban does not work. You probably have heard that there is a [court case in Maplewood](#), NJ contesting a recent blower ban. This issue is deeper than just addressing personal preference. Mr. Richardson's petition will directly impact the livelihood of your local lawn care industry. Professional quality leaf blowers are firmly entrenched as indispensable tools. Many problems can arise; for the city, for homeowners and for landscape contractors that depend on the leaf blower. The best thing to do is find a solution that everyone can support, especially the professionals. http://leafblownoise.com/#Will_a_ban_work

I read the above article with great interest and concern for much of what is being said about the leaf blower is incorrect and therefore misleading. Notwithstanding Mr. Richardson's anti-leaf blower claims, the only real problem with blowers is that some of them are noisy. Everything else you hear is pure embellishment supported by outdated and/or inaccurate opinionated quotations.

There are reputable organizations that have done research to determine if there are health hazards attached to leaf blowers. The Greenwich Department of Health indicated in a report that there is no health hazard attributable to leaf blowers.

http://leafblownoise.com/#Greenwich_Department_of_Health_Statement

Dr Nancy Steele, of the California Air Resources Board (CARB), came to the same conclusion in a report to the California State Legislature.

http://leafblownoise.com/#Dr._Nancy_Steele,_of_the_California_Air_Resources_Board

The claim that gasoline-powered leaf blowers create high levels of exhaust pollution is way out of line with today's reality. Yes, years ago engines from leaf blowers were troublesome and some of these may still be in service, but today's engines are well within acceptable limits according to the EPA. Due to

government regulations, effective January 2005, hydrocarbon emission has been reduced by 85 to 90%, depending on engine size. <http://leafblownoise.com/emission%20graph.htm>

You should know that it is illegal for a city to ban internal combustion engine driven products because of exhaust emission. Per the [Federal Clean Air Act](#), all States (except for California) or subdivisions thereof are preempted from controlling emissions, including through the means of banning.

One thing you can do if you are concerned about exhaust emission, is to require that all small off road handheld engines used in your city, not just leaf blowers, be manufactured after January 1, 2005. There is a label on the unit that will tell you when it was built.

<http://leafblownoise.com/Mounted%20emission%20Label.jpg>

In response to noise complaints, many years ago my engineering department developed the first "Quiet" leaf blower for ECHO Inc. Since then, several manufacturers have invested millions of dollars in tooling, testing and new assembly lines in order to provide this very important and invaluable alternative. I say *important* because this design is the solution to Mr. Richardson's leaf blower noise issue.

The industry attaches a label to the blower that indicates sound level, which is measured according to a highly detailed ANSI Standard that controls all the measurement variables. This makes it easy to determine sound magnitude at the point of purchase and in the field by the enforcement officer. The number to look for is 65 dB(A), measured at 50 feet. This represents a 75% reduction in sound from a typical noisy leaf blower at 77 dB(A). <http://leafblownoise.com/Sound%20label%20mounted.jpg>. I'm sure there are already many quiet gasoline-powered leaf blowers in Concord, but the problem is, if there is only one noisy leaf blower in the neighborhood, all leaf blowers are reviled. If you have not actually heard the difference between these two blowers (65 vs. 77 dB(A)), you owe it to yourself to seek out a comparative noise demonstration.

When you solicit information from professional contractors, you will find that they do not understand all the issues, but they can tell you how a ban will impact their income and how their customers will react. Mr. Richardson and Department of Public Works (DPW) Director Rich Reine understand that eliminating leaf blowers will impact the cost of operating a business. Otherwise, why is Mr. Richardson exempting Concord's DPW from his proposed legislation? He is hoping that if there is no additional cost to the city, his petition has a better chance of being adopted. One thing he is not considering is the [added cost of enforcing](#) such a controversial law.

Often those that do not like leaf blowers blame the professional user for the sound issue. You should consider that homeowners are the ones that work in their yards on Sundays and holidays. They are the ones that use their blower after work, well into the evening or very early in the morning when many are still sleeping. Because they buy inexpensive and underpowered units, they must run them longer than they should to get the job done. Most professionals limit their workday to normal business hours. And when they use the blower, they are interested in getting the job done as quickly as possible, usually less than ten minutes per residence.

One other thing to consider is that there is a need to use leaf blowers all year round. Yes, the fall of the year is the worst, but leaves from trees and shrubs as well as branches, grass clippings and seed pods require cleanup throughout the year.

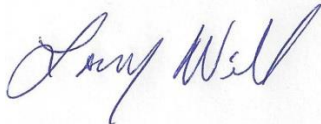
I could go into much more detail in this document pointing out all the inaccuracies found in the above referenced article, but to save time, if you are concerned that Mr. Richardson might be misleading your electorate, you can learn the facts about the leaf blower at my [website](#).

Lincoln, MA has taken a very sensible approach to the leaf blower issue, which you might want to consider. They have created a study group to glean all the facts surrounding the leaf blower issue. From that they will decide what is best for all concerned in their community. If you decide to do something similar, be sure to include in your study group, local stakeholders with actual knowledge about leaf blowers and how they are used or needed, i.e., homeowners, professional users, and technical experts. Base your decisions on facts, not opinions. Educate your voters to both sides of the issue and then ask them to vote their conviction. <https://www.lincolntown.org/488/Leaf-Blower-Study-Group>

If you decide that your residents should know the facts, i.e. the other side of the story, I would be happy to provide you with a less personal version of this letter, subject to editing of course, that you can have published either in your local news outlet or on your town's website.

Should you or your staff have questions that are not adequately answered at my website, please respond to this email or call with your inquiry.

Best regards,

A handwritten signature in blue ink, appearing to read "Larry Will".

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