

## **Questions and Answers on Gas-Powered Leaf Blower Ban Proposal**

1. **Question:** What economic effects might be expected if the Town were to ban the use of gas-powered leaf blowers (GPLBs)?

**Answer:**

- Three different sorts of economic effects might be considered:
  - Benefits vs. costs overall
  - Potential increase in cost of landscaping service for Town residents
  - The short term capital costs of transitioning away from battery-powered leaf blowers (BPLBs).
  
- Benefits vs. costs
  - We estimate the cost for a landscaping crew to switch from their existing GPLBs to BPLBs to be about \$600/year of service by the crew.<sup>1</sup>
  - We estimate benefits from this switch in terms of avoided health effects and mortality from GPLB emissions of fine particulate matter to be about \$4,000/year.<sup>2</sup>
  - Benefits in the form of reduced hearing loss among blower operators and avoided need for hearing aids might be about \$500/year.<sup>3</sup>
  - We have not attempted to monetize the other very significant benefits of switching to BPLBs, including avoided health effects from GPLB emissions other than fine particulates, the value to Town residents of avoided nuisance noise, etc.
  - It seems safe to conclude that the benefits of switching to BPLBs exceed costs by a factor of roughly ten.
  
- Increased costs to Town homeowners for lawn and property maintenance
  - Landscapers offer differing opinions about how much more, if any, it might cost to provide service using BPLBs than using GPLBs
    - Several landscapers say they now already compete cost-effectively for business in the Town using battery-powered equipment exclusively.
    - Other landscapers say their costs would increase if they were to have to use BPLBs. Estimated cost increases range from 10-30%.

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<sup>1</sup> This estimate assumes 2 blowers per crew -- one smaller blower for mostly cosmetic use throughout the growing season, and one large, powerful blower for fall leaf removal. Costs include capital and all operating and maintenance costs, amortized and combined so as to arrive at a single total annual cost figure

<sup>2</sup> Estimated using published data and methods from EPA, California Air Resources Board and others.

<sup>3</sup> GPLBs frequently measure greater than 100 decibels at the ear of the operator. Even if worn, hearing protectors on the market are typically not capable of reducing such a noise to the required 85-decibel OSHA standard. A BPLB is typically 6 - 10 decibels quieter than a comparably powered GPBL on the logarithmic decibel scale, roughly half as loud. The low-frequency sound waves emitted by GPLBs travel a much greater distance than the high-frequency waves emitted by BPLBs and pose a greater health risk.

The reasons cited include a perceived lower efficiency of BPLBs and the number of batteries needed to operate for a full day.

- If we assume an average cost increase of 10-15%, this might mean an increase of perhaps \$100 to \$300 in the annual cost of lawn service for a typical Town resident, if the landscapers passed along the full cost of the BPLBs to their clients.
- Assuming landscapers chose to pass along these costs rather than absorb them, we believe that Town residents could afford such a cost increase. Judging from the strongly positive response to our petition calling for a ban on GPLBs, we believe most residents would be willing to pay this amount in exchange for the much-reduced noise and pollution that would result from a ban.
- What are the short-term costs of transitioning from GPLBs to BPLBs?
  - We estimate that the capital cost for a landscaper to purchase the BPLBs and associated batteries and chargers needed to equip one crew would be about \$1,600 to \$4,000. This would provide for two BPLBs -- one small-to-medium blower to be used for mostly cosmetic blowing throughout the growing season, and one large, powerful blower to be used for fall leaf removal and perhaps spring cleanups, when they will want to manage large amounts of often wet leaves.<sup>4</sup>
  - Landscapers who operate GPLBs will need to transition to BPLBs -- without regard to what the Town requires -- if they want to serve DC and/or the Village, which have adopted bans effective 1/1/2022.
  - Nationally 72% of landscape companies have only 1 - 4 employees. We have no size information about the 50+ companies that we know of serving the Town and Village. We know generally that many landscaping and lawn service companies in the area are small businesses.
  - Landscaping companies locally have been deemed an essential service and most have continued to operate during the pandemic.
    - Their volume of business has held up well during the pandemic; for most landscapers neither up nor down substantially.
    - However, their costs have increased somewhat, due to coronavirus precautions and some fear that business will be down next year.

2. **Question:** If the Council wanted to move forward with a ban, what are some ways of mitigating costs to landscapers?

**Answer:**

- Options implicating legislative action:

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<sup>4</sup> The great majority of this cost is for the large blower and the 3 to 5 or more batteries needed to run it for much of the day without recharging, in contrast to the small blower which might be run for only 5 - 10 minutes at each of 6 - 10 properties per day.

- **Impose a ten-month ban, not effective between Oct. 15-Dec. 15.**
  - Smaller and relatively inexpensive leaf blowers suffice for the largely cosmetic purposes for which leaf blowers are used during most of the year. Our calculations suggest that BPLBs are quite suitable and less costly for such uses than GPLBs.
  - Most annual leaf blowing costs, and the great majority of the costs to landscapers of switching to BPLBs, are associated with these more powerful blowers needed in the fall.
  - The great majority of task force members oppose this approach because it does not address the significant public health concerns with heavy leaf blowing during the most intensive season.
  
- **Delay effective date of ban to January 1, 2023.** The Town would therefore provide a 3-year phase-in period for the ban to give landscapers an additional year before they need to incur the costs of replacing their more powerful blowers.
- **Considerations:**
  - This option could be combined with the first option, above. For example, a ten-month ban could go into effect in 2022, and a full ban could be delayed until October 2023.
  - DC passed its ban on leaf blowers in late 2018 with an effective date in January 2022. The 3-year phase-in period allows operators time to replace their older equipment with BPLBs when it wears out anyway because the equipment in continuous use in commercial operations does not last very long.
  - Delaying the ban until 2023 would provide the same phase-in period that the DC Council provided.
  - The great majority of task force members oppose this approach because it would postpone the significant benefits that the ban would provide.
  
- **Resident subsidy.** Town would provide a rebate to homeowners for the purchase of BPLBs, which they could make available to a landscaping company they hire, in exchange for a commitment not to use GPLBs on their properties.
- **Considerations:**
  - This subsidy would require significant efforts on the part of the property owner, as follows:
    - to research and purchase a BPLB;
    - to store the BPLB in a location accessible to the landscaping company, given that property owners are often not home when the company comes;
    - to charge batteries on a weekly or biweekly basis in advance of the landscaping company coming; and

- to monitor the landscaping company's activity when it does come to try to ensure that it does not also pull out GPLBs to get the job done faster (particularly during the fall if it is a large yard and the homeowner has provided only one battery powered blower).
  - It is unclear what would happen if the BPLB were damaged, either by the homeowner or the landscaper.
  - The cost of such a subsidy program could be reduced if neighbors were to pool together in acquiring a BPLB, though there would be further administrative difficulties in making the pooling work across multiple homeowners and perhaps multiple landscapers.
  - The Town would have no recourse if even well-intentioned homeowners did not take all of the above actions on a regular basis and the landscaping company began to use GPLBs again on its property.
  - This subsidy would not support a broader transition of landscaping companies to battery-powered fleets, and would be duplicative to the extent that companies are transitioning anyway given bans in nearby jurisdictions.
- ***Landscaper subsidy.*** Town would provide a subsidy to landscaping companies who demonstrate that they have at least one client in the Town.
- **Considerations:**
  - The subsidy could provide up to \$500 per landscaping company.
  - We estimate that approximately 400 households in the Town are currently serviced by landscapers using GPLBs. Assuming that each landscaping company using GPLBs in the Town serves an average of somewhere between two and four households, the Town could be asked to pay up to \$50,000-\$100,000 in subsidies.
  - A \$500 subsidy would subsidize a significant part of the purchase of a top-tier BPLB, the Oregon BLH120VX, which costs \$1100 including battery.
  - Given that most landscapers serving the Town have many more customers outside of the Town and that DC and Chevy Chase Village have both passed bans, the largest share of the Town's subsidy would support services provided in municipalities other than the Town.
  - In order to avoid disadvantaging landscapers who already use BLPBs, this subsidy should also be available to them.
- ***Lending program.*** Town could purchase BPLBs and make them available to landscaping companies for use on properties in the Town.
- **Considerations:**

- A lending program would require a Town employee to monitor any equipment locker and be available whenever landscapers need to use the equipment (i.e., typically approximately 7 am-6 pm Mon-Sat., including holidays.)
    - The program would require landscaping workers to compensate the Town for damage to the equipment.
    - The Task Force discussed this option at length as an alternative to proposing a ban and concluded that it poses insurmountable liability and maintenance problems.
  - Option not requiring legislative action:
    - ***Manufacturer discount programs.*** The Task Force could work with manufacturers to arrange for equipment discounts in conjunction with a ban. For example, Oregon, which manufactures the quietest and one of the most effective commercial-grade BPLBs on the market, has expressed interest in potentially offering a free battery (a \$750 value) with the purchase of \$1000 in battery-powered equipment.
    - **Considerations:**
      - The discounts would not fully defray the costs of equipment purchase.
      - The Task Force would continue to work with Oregon as well as other manufacturers to reach agreement on similarly significant discounts for Town landscapers if a ban were passed.
      - Groups from municipalities that have already passed bans have indicated that they would like to participate in such programs, which could increase manufacturers' interest in offering discounts.
      - The Task Force had anticipated presenting these discounts in conjunction with an equipment showcase and educational session directed toward landscapers. Oregon and other manufacturers have experience in running these events.

3. **Question:** What level of coordination could we have with neighboring municipalities?

**Answer:** We have set up a loose network of groups in DC and its Maryland suburbs, including some elected officers, who are working on limiting the use of GPLBs. The network includes representatives from Quiet Clean DC, the organization that successfully proposed DC's ban in 2022; Chevy Chase Village; Hyattsville; Somerset; the Town of Oakmont; and Chevy Chase West (the latter group is advocating a county-wide ban as Chevy Chase West lacks jurisdiction to impose its own ordinances.) These groups have all expressed interest in the potential landscaper outreach and discount event discussed above and in similar events.

4. **Question:** What sort of educational events related to GPLBs could the Council support for Town residents?

**Answer:**

- Options:
  - ***Outdoor educational events explaining the “whys” and “hows” of a ban.*** The task force could organize educational events in conjunction with a ban for Town residents, explaining why it is important and showcasing alternatives to GPLBs, including demonstrating the effectiveness of BPLBs as well as leaf mulchers.
  - ***Outdoor educational events addressing the negative impacts of GPLBs and the advancing technology of BPLBs.*** The task force has organized two educational events for Town residents and Town Council members, in conjunction with the Chevy Chase Village Environment Committee. The first event was a Sunday morning talk by Jamie Banks, head of the Quiet Communities nonprofit, and Chuck Elkins, of Quiet Clean DC, about the harms caused by gas-powered leaf blowers and efforts to abate them. That event drew approximately 50 people. The second event was a series of demonstrations of BPLBs by a local “quiet landscaper,” which drew approximately 15 attendees in addition to Task Force members. We could convene another, similar event.
- Considerations:
  - Asking the Task Force to plan these events would not require legislative/regulatory action.
  - In the absence of a ban, future educational events would duplicate the events we have already convened.

5. **Question:** How could a ban be enforced without pitting neighbors against one another?

**Answer:**

- This approach is no different from approaches currently used to address loud music or noise from construction. Reducing the loud noises coming from a neighbor’s yard will only make the Town more peaceful and neighborly, rather than the reverse.
- Montgomery County provides for online filing of complaints by two observers against any noise from activities other than construction that exceeds 65 decibels at the property line. The County will then send personnel to investigate and perhaps monitor the alleged excessive noise. This requirement is, as might be expected, rarely enforced. Violators are subject to a fine of \$500 for the first offense, \$750 for subsequent offenses, and other relief as allowed by law.
- The County has another standard that effectively prohibits operation of any leaf blower that is labeled as creating noise exceeding 70 dBA. Enforcement of this standard turns on checking the manufacturer’s noise label on the blower, which is far easier than the procedure for the first County standard.
- We have proposed a more efficient and more lenient approach to enforcement, whereby if a neighbor is using or employs a company that is using GPLBs, a resident can photograph the usage, and submit the photo along with the name/phone number of

the company (usually found on the truck) and address/date/time where gas-powered leaf blower is being used to the Town Office for follow up.

- If there isn't a name/phone number on the truck, the Town resident can ask the equipment user for his/her name or card and follow steps as above.
- 1<sup>st</sup> offense: Town sends a warning/educational letter to company and/or property owner.
- 2<sup>nd</sup> offense (if it is within 15 business days of 1<sup>st</sup> offense): Town sends a citation letter to company (\$250 fine) and notification letter to property owner.
- 3<sup>rd</sup> offense (if within 15 business days of 2<sup>nd</sup> offense): Town sends a 2nd citation letter to company (\$500 fine), a letter to the county, and a strong notification letter to property owner.