



January 20, 2010

Via Email

Honorable Anthony Colavita
Supervisor
Eastchester Town Hall
40 Mill Road
Eastchester, NY 10709

Dear Supervisor Colavita:

On behalf of the American Lung Association in New York, we write in support of a proposed enactment of a leaf blower ordinance for the Town of Eastchester.

While we do not take a position on items with respect to the issue of noise, we do believe that there will be some very real health benefits that will accrue if this measure is enacted into law. Equipment that has zero-emissions (rakes and brooms and electrically powered tools) is the healthy way to go. There are many reasons why no-emissions technologies are best.

First, air quality in your region is rather unhealthy. Our annual report, *State of the Air 2009*,¹ finds that ozone air pollution in Westchester County (as observed at the State's air pollution monitoring station in White Plains) fails our clean air test. Additionally, the United States Environmental Protection has declared that Westchester County is "out of attainment" for the federal ozone² and fine particle³ health standards.

Second, small sources of emissions can add up to be big polluters. As you may know, one of the arguments against controlling small engines is that they are just that, small. However, a lawnmower running for an hour emits the same amount of smog forming emission as that you would emit by driving a car for 8 hours. Multiply this statistic with the number of engines in your area and you have a better idea of the contribution these small engines can make to your region's poor air quality. These small sources will also become a bigger percentage of the pollution pie as stringent emission limits are applied to other tailpipes and to smokestacks.

¹ See <http://www.stateoftheair.org>

² <http://www.epa.gov/ozonedesignations/regions/region2desig.htm>

³ <http://www.epa.gov/pmdesignations/regions/region2desig.htm>

Third, small engines do not have the sophisticated pollution control devices as a passenger vehicle has. Thus, the level of pollution they belch out can be quite high. For gasoline powered-equipment, the emissions can cause or worsen ozone levels and also increase the amount of airborne cancer agents. Gasoline has many cancer agents in it and these engines have no real emissions controls on them. In addition, small engines that use two-stroke technology, where the gasoline and oil are mixed are particularly big polluters. About thirty-percent of the fuel poured into these engines is directly emitted in the exhaust.

Finally, states are limited by federal law as to what they can do to address the emissions from small engines. Up until 2003, federal clean air laws provided states with the right to copy the California emission standards for small engines, which traditionally have been better than the ones that the US EPA has set. The law was changed by Congress to bar states from replicating the California emission standards for lawn and garden equipment. So we are at the mercy of the US EPA standard setting process when it comes to establishing emissions limits. The options for states or local governments in New York are these:

- ✓ Urge the US EPA to set stringent emissions limits for small engines (which EPA is inclined to do, but one industry player is making their job tough to accomplish);
- ✓ Restrict the use of small engines; and,
- ✓ Ban the use of equipment that runs on small engines.

We wish there were more choices at our disposal to deal with this very important public health issue. Given limited options, the American Lung Association in New York is pleased to support local ordinances which limit the use of leaf blowers.

Sincerely,



Michael Seilback,
Vice President, Public Policy & Communications

cc: Town Board