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June 27, 2023

10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Attention: Ellen Devlin

iec@toronto.ca

**RE: IEC 5.1 Two-Stroke Engine Small Equipment: Steps to Pursue a Ban**

Dear Chair and Members of the Infrastructure and Environment Committee

The Deer Park Residents Group (DPRG) represents residents in the area between Avenue Road to the west and Mt. Pleasant Cemetery and the Vale of Avoca to the east, and the Beltline to the north and Woodlawn Avenue West and the properties on Jackes Avenue to the south.

The report proposes two options – A. Leading by example and B. Pursuing a ban on two-stroke engine equipment”. But given that the major issue raised for years regarding regulating two-stroke engines is the excessive noise levels of leaf blowers.

The DPRG supports the ban option but recommends a third option for gas powered leaf blowers that is simpler and faster. Ban only gas powered leaf blowers as soon as possible.

Contrary to the report, there is support for this leaf blower ban. The report states “It was determined that banning leaf blowers, due to noise, is overly restrictive based on the low volume of complaints, low public support, practicality of enforcing the ban, and unintended effects on the City, industry and consumers.”

But as has been noted previously, the low volume of complaints about leaf blowers is due to the fact that 311 will not accept complaints during the time the leaf blowers are allowed to operate and that is when they normally would do operate! The Gasbusters group has shown that there is public support for banning noisy gas powered leaf blowers. Further, a new tool is now being developed that people can use to easily report excessive noise.



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Given noise from leaf blowers, not all two-stroke engines, is the major noise issue, create a new special Noise Bylaw category – “leaf blower” and set a db level specially for it. And make this change a priority item that can be implement asap.

Given the main issue that affects most residents is the noise from leaf blowers, not all two-stroke engines, make this change a priority item that can be implement asap. Create a special category of two-stroke engine equipment – leaf blower – and create a new noise bylaw provision for this use and set a db level for it.

The report states that “New equipment being sold today tends to be quieter, with electric models being quieter than gas-powered models. However, the market now includes "low noise" gas-powered leaf blowers, which are rated at a sound level of 65 dB. Comparatively, typical speech is about 60 dB and a washing machine is 75 dB (2022.EC31.4).” This kind of change was anticipated in Recommendation 15. of the EC31.4 report states that “City Council direct the Executive Director, Municipal Licensing and Standards to report back during the Noise Bylaw Review in 2023 regarding options for setting decibel limits for power devices.”

Therefore, we recommend that the Noise Bylaw should be amended asap and at least as part of the during the upcoming fall review to establish 65 db as the maximum allowed for leaf blowers. We recognize that this change will have a transition plan.

Yours sincerely,

Cathie Macdonald  
President, Deer Park Residents Group

CC Councillor Matlow  
Carlton Grant, Executive Director, Municipal Licensing and Standards