

March 3, 2026

Esteemed Chairs Lopes and Parker,  
Members of the Environment Committee:

Thank you for the opportunity to comment on Raised Bill 319, *An Act Concerning the Use of Battery-Powered Leaf Blowers and Similar Equipment by the State and Municipalities*. I appreciate your Committee's attention to the impacts of small combustion equipment, particularly gas-powered handheld and backpack leaf blowers. These devices have become a flashpoint in many Connecticut communities, and that alone signals that the issue deserves legislative consideration.

I would like to offer several observations that focus less on electrification policy mechanics and more on what I believe is the underlying issue: environmental noise pollution and the adequacy of Connecticut's legal framework.

## **I. NOISE POLLUTION IS A PUBLIC HEALTH ISSUE, NOT MERELY A NUISANCE**

Noise is often dismissed as a quality-of-life irritation. That framing understates the issue. A robust body of public health research, including findings from the World Health Organization and the Centers for Disease Control and Prevention, has documented associations between chronic environmental noise exposure and:

- Sleep disruption
- Childhood learning deficits and cognitive impacts
- Adverse mental health outcomes
- Elevated stress and blood pressure
- Increased risk of cardiovascular events and mortality

In Connecticut's dense suburban environments, where property lines are close, remote work is common, and outdoor space is heavily utilized, persistent or intrusive noise exposure can have measurable health and well-being consequences. This is not simply about annoyance. It is about chronic environmental exposure.

## **II. ELECTRIFICATION ALONE DOES NOT RESOLVE THE STRUCTURAL NOISE PROBLEM**

While battery-powered equipment may reduce emissions and, in some cases, peak decibel levels, electrification is not synonymous with silence. Noise characteristics such as tonal components, impulsive sound, and low-frequency noise can persist regardless of fuel source. Fundamentally, the question remains:

- What noise levels are acceptable?
- How are they measured?
- Who enforces them?
- Under what authority?

If Connecticut's noise control framework is inadequate, fuel substitution alone will not solve the problem.

### III. CONNECTICUT'S NOISE CONTROL FRAMEWORK IS STRUCTURALLY INCOMPLETE

In conjunction with Sustainable CT, WestCOG recently released a [statewide inventory of municipal noise ordinances](#). This project identified systemic deficiencies in noise pollution control:

- A majority of municipalities do not have a local noise ordinance
- Only one municipality has an ordinance fully aligned with CGS §22a-73.

These findings suggest that the current statutory framework has not translated into consistent, on-the-ground enforcement capacity. Connecticut's state noise control laws were designed with the expectation that municipalities would adopt local ordinances. In practice, that has not occurred consistently. As a result:

- Residents in most communities lack a clear enforcement pathway.
- Municipal officials may be uncertain about their authority.
- State standards exist, but practical enforceability is uneven.

A system that depends on universal local adoption, but does not achieve it, becomes structurally ineffective. In practice, this means that in many communities, the pathway for local enforcement remains unclear despite the existence of state noise standards. Clarifying that municipalities may apply those standards at the local level, even in the absence of a local noise ordinance, would significantly improve the practical effectiveness of Connecticut's noise control framework. Without clear authority, environmental noise control becomes aspirational rather than operational.

### IV. STATE NOISE STANDARDS REMAIN IMPORTANT BUT FACE NEW CHALLENGES

Connecticut state law creates an important framework for addressing environmental noise. However, some modern types of noise behave differently from those that were common when the state's noise pollution laws were originally enacted. As a result, some noise sources may fall into gaps within the current framework. These include:

- Persistent small-engine noise from handheld or backpack devices (the subject of this bill)
- Low-frequency industrial or mechanical noise
- Electrical equipment noise (e.g., heat pump compressors, solar inverters)

There is now a substantial body of scientific research and practical experience addressing these types of noise impacts. Many jurisdictions have updated their noise standards and measurement approaches to better reflect modern equipment and sound characteristics. Consideration of updates to Connecticut's noise pollution statutes would help ensure that the state's framework continues to provide effective protection as technologies and equipment evolve.

At the same time, the importance of modernizing these standards should not obscure the fact that the state already has noise standards in place today. Making it explicit in state law that municipalities may enforce those existing standards would significantly improve the effectiveness of Connecticut's noise control system.

## V. FISCAL CONSIDERATIONS

The bill proposes utilizing the public benefits charge on electric ratepayers to fund electrification programs. Given Connecticut's already high electricity costs, policymakers should be cautious about layering additional charges onto electric bills. There may be alternative approaches that do not rely on ratepayer-funded mechanisms. That said, fiscal instruments should not overshadow the more fundamental issue: the clarity, modernity, and enforceability of our noise control framework.

## VI. THE BROADER OPPORTUNITY

Noise pollution remains one of the least systematically addressed environmental health issues. It does not fit neatly into air, water, or waste categories. It is episodic, localized, and highly personal — yet its impacts are real and measurable. This bill presents an opportunity not only to address equipment type, but to:

- Clarify enforcement authority.
- Address emerging noise pollution.
- Recognize noise as an environmental health concern.
- Provide municipalities with clear, usable tools.

In our communities, the absence of a local ordinance should not mean the absence of protection.

## VII. CONCLUSION

The concerns raised by gas-powered leaf blowers are real, but they are symptoms of a larger structural issue: Connecticut's environmental noise policy framework has not kept pace with contemporary conditions.

WestCOG respectfully encourages the Committee to consider the recommendations outlined in the attached memorandum, which identify several areas where Connecticut's environmental noise framework could be clarified, modernized, and strengthened. These improvements could be implemented through relatively modest clarifications to state law and would help ensure that Connecticut's existing noise standards function as intended across all municipalities.

Thank you for your consideration.

Sincerely,



Francis R. Pickering  
Executive Director

## RECOMMENDATIONS FOR STRENGTHENING CONNECTICUT'S ENVIRONMENTAL NOISE FRAMEWORK

In light of the issues discussed in testimony, WestCOG respectfully offers the following recommendations for the Committee's consideration. These recommendations are offered to strengthen Connecticut's environmental noise framework in a manner that is clear, enforceable, and implementable across municipalities of varying size and capacity.

### *1. Clarify Municipal Enforcement Authority*

The Committee may wish to consider explicitly clarifying in statute that state noise standards are enforceable by municipalities even where a local noise ordinance has not been adopted.

As documented in WestCOG's recent statewide inventory of municipal noise ordinances:

- A majority of Connecticut municipalities do not have a local noise ordinance.
- Only one municipality has adopted an ordinance fully aligned with CGS §22a-73.

The current framework relies heavily on local adoption that has not occurred consistently in practice. Clarifying the enforceability of state standards would reduce ambiguity and ensure that residents are not left without recourse in communities lacking local ordinances.

### *2. Direct Review and Modernization of State Noise Standards*

Connecticut's noise standards were forward-thinking when adopted, but they predate:

- Use of handheld and backpack gas-powered equipment.
- Growing concerns regarding low-frequency industrial and mechanical noise.
- Widespread use of electrical building and energy systems.
- Current public health understanding of chronic environmental noise exposure.

The Committee may wish to consider updating standards to address:

- Treatment of tonal and impulsive noise characteristics.
- Consideration of low-frequency noise.
- Applicability to modern equipment categories.
- Measurement methodology.

Such a review would ensure that Connecticut's framework reflects present-day conditions.

### *3. Improve Clarity of Measurement and Enforcement Protocols*

Consistent and defensible enforcement requires:

- Clear measurement methodology.
- Standardized equipment expectations.
- Defined procedures for documentation and compliance assessment.

Ambiguity in these areas can discourage enforcement or lead to inconsistent application across municipalities. The Committee may wish to consider measures that promote clarity and uniformity in measurement standards.

#### ***4. Recognize Environmental Noise as a Public Health Matter***

Environmental noise should be understood not merely as a nuisance issue, but as an environmental health concern. Chronic exposure to elevated environmental noise has been associated with measurable health impacts, including sleep disruption and cardiovascular stress.

Framing standard updates within a public health context would align Connecticut's approach with contemporary research and reinforce the seriousness of the issue.

#### ***5. Support Regional Technical Capacity for Municipal Implementation***

Implementation capacity varies among municipalities. Many smaller communities lack access to:

- Calibrated sound level meters.
- Personnel trained in measurement protocols.
- Technical expertise necessary for defensible monitoring.

Councils of Governments routinely provide shared technical resources and equipment to member municipalities, including traffic counters, video data collection platforms, and drone services. A similar shared-resource model could support consistent and professional noise monitoring capacity across multiple municipalities.

Such regional technical support would:

- Enhance implementation without altering enforcement authority.
- Avoid duplication of specialized equipment in every municipality.
- Provide training and technical assistance where needed.
- Promote uniform application of state standards.

This model would complement, not displace, the roles of municipal officials or regional health districts.

#### ***6. Exercise Caution in Expanding Electric Ratepayer Charges***

While electrification of certain equipment may reduce some impacts, policymakers should be mindful of Connecticut's already high electricity costs when considering expansion of electric ratepayer-funded mechanisms. Alternative approaches that do not increase electric bills may merit consideration. However, fiscal tools should not overshadow the more fundamental need for a clear, modern, and enforceable noise control framework.

#### ***Closing Note***

Noise pollution is often an under-addressed environmental issue. Raised Bill 319 presents an opportunity not only to address specific equipment categories, but to strengthen Connecticut's overall environmental noise policy architecture in a manner that is practical, modern, and implementable.

WestCOG appreciates the Committee's consideration of these recommendations.