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STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

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n-96-01
II-A-1042



March 5, 1981

Henry E. Thomas, Director
Standards and Regulations Division
ANR-490
U. S. Environmental Protection Agency
Washington, DC 20460

Attention ONAC Docket 81-02 (Medium and Heavy Trucks)

Dear Mr. Thomas:

This is in response to the U. S. Environmental Protection Agency's (EPA) deferral of the effective date of the 1982 noise emission standard of 80 decibels for medium and heavy trucks from January 1, 1982, to January 1, 1983.

The California Department of Transportation (Caltrans) is not in agreement with the one-year deferral of the emission standards and is particularly opposed to any further deferral of these standards for medium and heavy trucks.

Caltrans has embarked on a noise abatement program which consists of constructing noise barriers along existing freeways. The goal of this program is to lower the freeway-generated traffic noise in the adjacent residential areas to a level of 67 dBA (Leq) or lower. This program has an estimated cost of over \$500 million based on present construction costs.


We are in agreement with EPA's position stated in Section 3.14, page 8502, of the January 27, 1981, Federal Register that trucks are the dominant source of traffic noise impacts. It is considered that the lower emission levels (83 to 80) for medium and heavy trucks could significantly lower the noise barrier cost for barriers proposed in California as well as for other states that have or will have a similar noise reduction program.

Section 3.3, page 8499, of the January 27, 1981, Federal Register states that the request to set aside the 80 dBA truck regulations is based on the Council on Wage and Price Stability (COWPS) evaluation that the proposed 80 dBA regulatory level is lacking in economic justification. As stated in Section 3.3, COWPS only assessed the cost to reduce the noise level versus economic benefits such as reduced fuel costs and improved property values. The EPA's evaluation also considered these factors as well as the

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potential health and welfare benefits. It is recommended that the reduced noise barrier construction cost, by reason of the 80 dBA regulation and anticipated additional reductions, also be considered in the evaluation of the lower emission level benefits. In California alone, this is a very significant factor that has the potential for savings in the tens of millions of dollars.

Sincerely,


for WILL KEMPTON
Assistant Director
Legislative Affairs

SARD APR-80

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