

DEPARTMENT OF TRANSPORTATION  
 DIVISION OF HIGHWAYS  
 1120 N STREET  
 SACRAMENTO, CALIFORNIA 95814  
 (916) 445-8045

01 02-48-2  
 81-07-18  
 0-96-01  
 II-A-1082



May 7, 1981

Henry E. Thomas, Director  
 Standards and Regulations Division  
 Office of Air, Noise and Radiation (ANR-490)  
 United States Environmental Protection Agency  
 Washington, DC 20460

Dear Mr. Thomas:

This refers to your letter of April 6, 1981 requesting clarification of our recommendation that the 80 dB Federal Noise Emission Regulations for medium and heavy trucks not be deferred for one year nor permanently rescinded. Our response to your request is as follows:

1. Attached is a copy of the recorded sound level measurements from one of our freeways. This recording identifies the source of the peak noise events and clearly shows that trucks are the dominant noise source. This recording is typical of all our sound measurements. In addition, we receive numerous complaints from citizens who reside adjacent to our freeways complaining of the high levels they are receiving. In most all cases, these complaints single out trucks as being the most disturbing noise source.
2. Although implementation of the 80 dB regulation will not affect the tire noise and only change truck freeway noise slightly, it is expected that it will lower the effective acoustic center for trucks, particularly where the reduction is achieved by improved exhaust mufflers. Because trucks are the dominant noise source, where practical, California is designing noise barriers to intercept the line of sight from source to receiver using a 11½-foot truck stack height in order to reduce the intrusiveness of truck noise, particularly at locations where trucks are a substantial percentage of the total off-peak traffic volume. This lower acoustic center could reduce the wall height requirements by an average as much as 1 foot and could also eliminate the need for noise barriers at some locations.

-SEND ANR-490

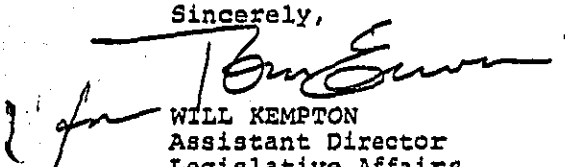
19 MAY 01 14: 55

Mr. Henry E. Thomas, Director  
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3. As stated in our March 5, 1981 letter, it is estimated that it will cost over \$500 million to construct noise barriers along existing freeways in California where the existing noise levels exceed 67 dBA Leq. The total length of wall required is approximately 500 miles. If the reduction of the truck emission standards by 3 dBA reduces the wall height by an average of 1 foot at a cost of \$10/square foot, it would result in a savings of approximately \$25 million. In addition, a reduction in wall length by 5% would result in an additional \$25 million savings. The reduced traffic emission levels would also make the existing constructed barriers more effective.

In summary, for reasons cited above, the California Department of Transportation is opposed to the one year deferral of the 80 decibel standard (from January 1, 1982 to January 1, 1983) and also opposed to any permanent rescission of this lower standard.

Sincerely,



WILL KEMPTON  
Assistant Director  
Legislative Affairs

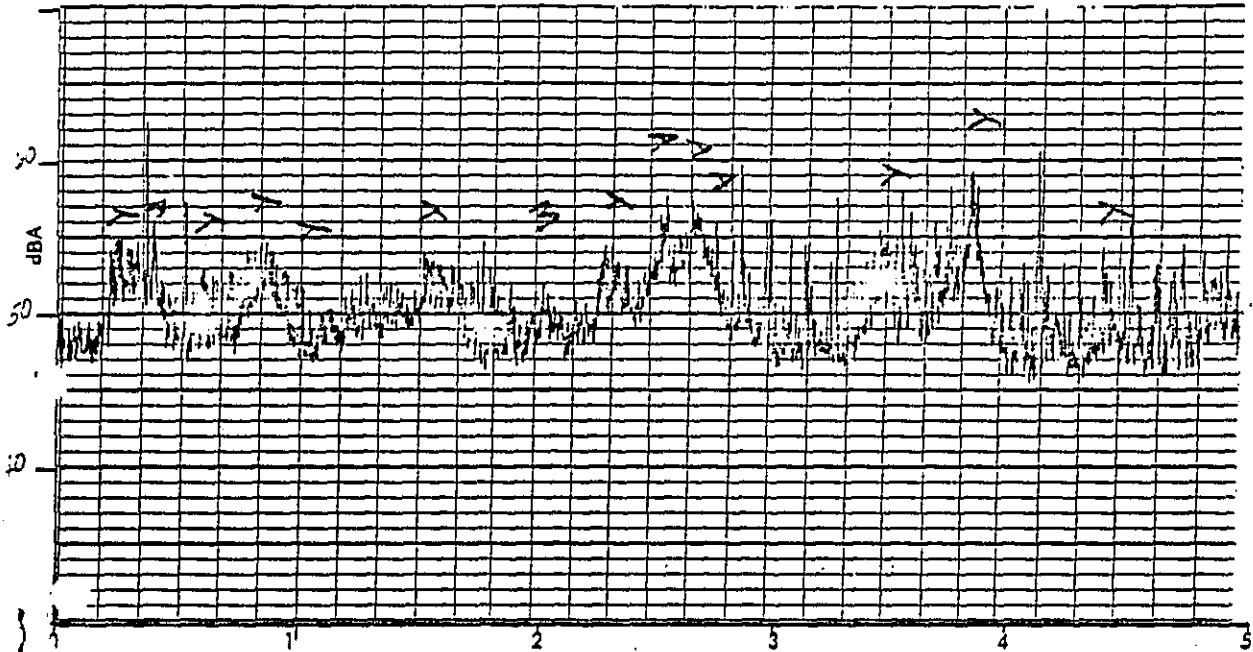
Attachment

# SOUND LEVEL MEASUREMENT

DEPARTMENT OF TRANSPORTATION  
 DISTRICT 7  
 ENGR. SERVICES BRANCH  
 ENVIRONMENTAL INVEST.  
 DATE 3-19-74

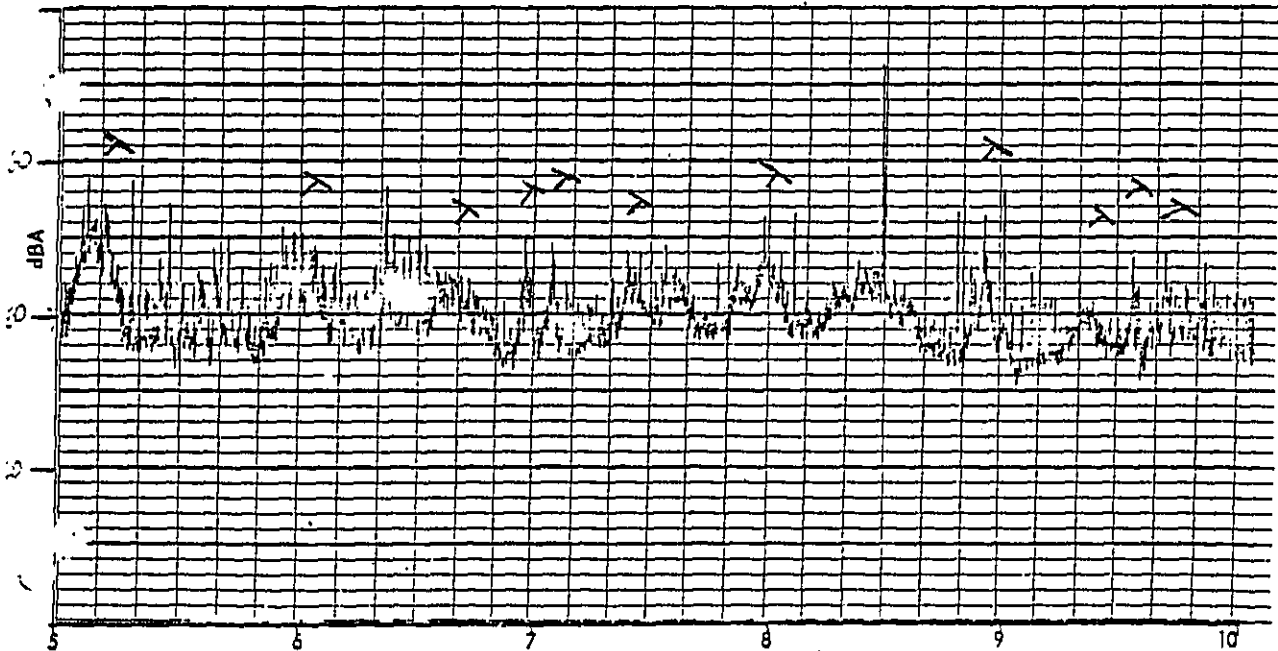
CO. LA RTE 10 P.M.  
 LIMITS \_\_\_\_\_  
 E.A. NO. 710093  
 METER NO. 5925 CALIBRATOR NO. 2795  
 INVESTIGATOR \_\_\_\_\_

LOCATION DESCRIPTION  
Marvin School  
Room #17 inside  
Windows open



STARTING TIME 6:21

TIME (MINUTES)



CALIBRATION:  
 READING \_\_\_\_\_ TIME \_\_\_\_\_

- |             |             |                  |
|-------------|-------------|------------------|
| (N) = NOISE | (C) = CAR   | (A) = AIRCRAFT   |
| (L) = LOCAL | (T) = TRUCK | (M) = MOTORCYCLE |
| (D) = DOG   | (B) = BUS   | (V) = VOICE      |