# I-123 Tony Eason (4)

Comment Letter I-123

**From:** T. Eason <fteason@gmail.com>
**Sent:** Sunday, August 13, 2017 7:59 PM
**To:** Smith, Ashley; Slovick, Mark
**Subject:** Fwd: Newland Sierra DEIR

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From: **T. Eason** <fteason@gmail.com>
Date: Sun, Aug 13, 2017 at 7:55 PM
Subject: Newland Sierra DEIR
To: Tony Eason <teason@cox.net>

Ashley and Mark:

Because of the serious nature of the subject, I am writing a follow up letter on the DEIR's Air Quality study. My first letter was dated July 21, 2017. On page 2.3-64 the DEIR concludes that combined emissions (construction and operational) will exceed thresholds for CO, PM2.5 , PM25 and VOC's. It states that "... feasible mitigation measures are not available to reduce to less than significant.." these pollutants, they are therefor "significant and unavoidable". The DEIR is supposed to provide mitigation to " the greatest extent practicable" whether it reduces the problem to an insignificant level or not. I-123-1

I do not think all feasible mitigation has been applied because sound walls have been shown the be effective in dispersing the very kinds of pollutants this project is trying to mitigate... those produced by fuel combustion from trucks and construction equipment. See the following paragraphs from studies by the California Air Resources Board, April, 2017, Section 5, Sound Barriers such as sound walls, P.30 (https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF) : I-123-2

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FINDING: Measurement and modeling studies consistently find that solid barriers reduce near-road downwind concentrations by increasing vertical dispersion of pollutants emitted by vehicles. The magnitude of the reduction and its spatial extent depend on the height of the barrier, the width of the road, and micrometeorology. As reference, studies have consistently found a concentration deficit downwind of the barrier, ranging from a 10 percent to 50 percent reduction compared to concentrations measured on or directly adjacent to highvolume roadways. I-123-3

Field measurement studies generally show that solid barriers, such as sound walls, can effectively and significantly reduce near-road pollution concentrations for a variety of traffic air pollutants [48, 51, 124-127]. Baldauf et al. measured concentrations of NOX, PM, and air toxics behind a 1 km long barrier along Interstate I-440 in Raleigh, NC using a mobile platform and fixed sampling instruments. The study revealed that CO and PM number concentrations generally decreased between 15-50 percent behind the barrier [48]. Ning et al. also measured lower pollution concentration reductions where barriers were present along I-710 and I-5 in Southern California, compared to where they were not present [125]. Finally, a more recent field study in Phoenix, AZ—which measured NO2, CO, UFP, and black carbon (BC) using both a mobile platform and fixed sites—found that pollutant concentrations behind the roadside barriers were significantly lower relative to those measured in I-123-4

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the absence of barriers. The reductions ranged from 50 percent within 50 meters (~164 feet) from the barrier to about 30 percent as far as 300 meters (984 feet) from the barrier [51].

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Note that reductions in pollutants ranged from 50% within 50 meters from the barrier to 30% at 300 meters, very much the extent of our park from Deer Springs Road. The study was done along a freeway but the elevation of the project, the topography and the prevailing wind direction place our park directly in the path of these air borne construction pollutants.. the same ones that are dispersed by the sound walls. Dispersion of these pollutants over a 10 year period would have a mitigating effect on the serious threat to our health they would have.

I-123-4 Cont.

Besides the mitigation to the air pollution a sound barrier would also mitigate the noise from construction and increased traffic that will result from the project even though it wasn't shown to exceed thresholds by the flawed Noise study in the EIR. An expert has reviewed this 3 year old study,essentially invalidating its findings by pointing out its errors and deficiencies.

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This report will be forwarded to you separately ( Jeff Fuller, dBF Associates, Inc.) The DEIR, on page 2.10-38, states "mitigation of significant cumulative off site impacts from the project related traffic nose level increases along Deer Springs Road is infeasible and cumulative impacts would be significant and unavoidable".

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The reasons presented for not recommending a sound wall along Deer Springs Road near our park are invalid: 1) there are no driveways there; 2) there is virtually no upkeep for a properly constructed sound wall; and 3) it can effectively be constructed within the ROW (per the grading map). The effectiveness of sound barriers is well documented, even by the EIR itself. There is no issue with sight lines given the elevation of the project and that our park is requesting it. There should be no traffic sight line questions because such a sound wall was approved by the County staff and Building Commission for the Merriam Mountain project.

I-123-8

I therefore submit to you that not "all feasible mitigation" has been proposed, namely sound barriers, as required in this DEIR.

Please reconsider and correct this deficiency based on the above data. This is a vital concern for our park.

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Tony Eason