
From: Poling, Jeanie (CPC)
Sent: Monday, May 13, 2019 11:58 AM
To: Steven Vettel
Cc: Wietgreffe, Wade (CPC); Karl Heisler; Susan Yogi; Brian Schuster; Pollak, Josh (CPC); McKellar, Jennifer (CPC); Joe Kirchofer
Subject: RE: Balboa Reservoir EIR - haul truck / vendor truck mitigation measure

Hi Steve,

Thank you for your memo with your initial feedback regarding the feasibility of the construction air quality mitigation measure (M-AQ-2a). The Planning Department has additional questions before deciding on the feasibility of the measure. The primary question is this: are you suggesting (1) the 2014 engine model year for on-road trucks is infeasible, or (2) any engine model year restrictions for on-road trucks is infeasible? Please clarify and further substantiate your rationale. Context and further questions are below.

Several Planning Department's CEQA documents have implemented mitigation measures to address NOx emissions from on-road heavy-duty diesel trucks during construction when there have been significant construction-related impacts. These projects include Potrero Power Station EIR, Mission Rock EIR, India Basin EIR, and SFPUC's Biosolids Digester Project. In these cases, the mitigation measure used to address on-road truck emissions was to have either all or a portion of trucks over a certain weight use engine model year 2010. The fact that these projects have implemented on-road haul truck mitigation measures demonstrate that it is feasible for a project to implement mitigation that addresses on-road construction-related impacts. Potrero Power Station, Mission Rock, and India Basin are broadly similar in type (i.e., a large number of residential units), scope, and complexity to the Balboa Reservoir project, and have agreed to use subcontractors for on-road trucks.

That said, we recognize that each project may have different circumstances and that it may be more difficult to locate equipment with the recent model year engines.

Research from ESA indicates that, given the annual improvement in emissions year standards, 2010 model year engines for on-road heavy-duty diesel trucks would be less effective than the average fleet from 2020 onwards. ESA has recommended engine model year 2014 for heavy duty trucks weight over 19,500 lbs. in order to address significant construction-related emissions stemming from on-road truck emissions.

It's not clear to us what the distinction is between haul trucks and vendor trucks. Can you describe the difference? The other projects cited above did not make a distinction between the two in developing mitigation measures.

We also wanted to clarify that the mitigation measure would refer to engine model year rather than the year of the trucks themselves, as older vehicles may be retrofitted with a newer engine model year.

Given the overall construction schedule and budget of the project, it is difficult to see how the figures cited for cost and schedule of implementing a newer model year for haul trucks would not be feasible, since the additional days and costs cited represent very small increases relative to the scale of the project. Is the claim in the memo that the project would no longer be viable with the additional cost and days needed for haul trucks?

Can the contractor provide data to back up the engine year figures cited in the memo?

In terms of addressing the significant construction impact caused by on-road trucks, ESA described that the impact itself would largely begin to occur after construction begins, in the year 2022.

What is the turnover in terms of model year for the fleets used by contractor? This is important in understanding the availability of newer model years in the future.

For example, in 2018, say that a large portion of the current fleet is engine model year 2010 or newer (an 8-year gap). If fleet turnover remains constant, then by 2022, the engine model year of 2014 (an 8-year gap) would be equivalent to using model year 2010 today.

Your response to this email will help us provide guidance on how to address the currently significant construction-related impact.

Thank you.

Jeanie Poling

Senior Environmental Planner

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From: Steven Vettel <SVettel@fbm.com>

Sent: Wednesday, April 24, 2019 10:27 AM

To: Brian Schuster <bschuster@esassoc.com>; Joe Kirchofer <Joe_Kirchofer@avalonbay.com>

Cc: Wietgreffe, Wade (CPC) <wade.wietgreffe@sfgov.org>; Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>; Karl Heisler <kheisler@esassoc.com>; Susan Yogi <SYogi@esassoc.com>

Subject: Balboa Reservoir EIR - haul truck / vendor truck mitigation measure

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All, attached is the project sponsor's analysis setting forth the reasons that the potential AQ mitigation measure regarding haul trucks and vendor trucks is not feasible.

From: Brian Schuster [<mailto:BSchuster@esassoc.com>]

Sent: Wednesday, April 17, 2019 12:00 PM

To: Vettel, Steven (25) x4902; Joe Kirchofer

Cc: Wietgreffe, Wade (CPC); Poling, Jeanie (CPC); Karl Heisler; Susan Yogi

Subject: Balboa Reservoir EIR - haul truck / vendor truck mitigation measure

Steve,

Here is a potential vendor truck MM language; I combined it with haul trucks:

The project sponsor shall ensure that all on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the project site, including heavy-duty construction trucks (such as haul trucks, water

trucks, dump trucks, and concrete trucks), and all vendor trucks (such as construction material delivery trucks) be model year 2014 or newer.

If this is not feasible, please prepare a memo for the administrative record describing why it's not feasible to impose certain vendor truck mitigation. Please separately address the haul truck requirement and the vendor truck requirement (i.e. it may be feasible to do this for haul trucks but not for vendor trucks).

Thanks,
Brian

Brian Schuster

Senior Air Quality and Climate Change Consultant

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