
From: Pollak, Josh (CPC)
Sent: Tuesday, June 25, 2019 5:58 PM
To: Poling, Jeanie (CPC); Wietgreffe, Wade (CPC)
Cc: McKellar, Jennifer (CPC)
Subject: Balboa Mitigation Measure Follow-Up
Attachments: Example Offset MOU w Air District.pdf; Engine Label Proof.pdf; TRUCRS document proof_Redacted.pdf

Hi Jeanie and Wade,

I wanted to share follow-up on our meeting on (1) the feasibility of implementing and documenting compliance with on-road truck emissions and (2) implementing offsets with the Air District. I've drafted an email below that we can modify before sending to the sponsor:

Hello,

We want to follow up on two points raised during our earlier meeting, the first being the feasibility of mitigation for on-road heavy-duty diesel trucks used by vendors, and the second implementing air pollution offsets with the Air District.

Regarding the first, we spoke with compliance monitoring staff at SFPUC, who verified that as project sponsors, they have been able to specify the model year of on-road heavy-duty diesel trucks for projects by including it in the contract specifications, including for vendor trips. There are two ways that the SFPUC has used to provide proof of engine years on project site: the first is to take a photo of the engine (example attached), and the fleet owners can generate a report on the TRUCS site (https://ssl.arb.ca.gov/ssltrucrsto/trucrs_reporting/login.php) that includes engine year. An example of the TRUCS output is attached. The second is to [look up the truck's VIN#](#), which provides the model year of the truck, but the engine year is not provided. Generally, the engine model year falls one year behind the truck model year.

As written in the draft, implementation of this mitigation measure would only be required under the compressed construction schedule. We understand that it may be difficult for vendors that have one or a handful of truck trips to provide this information. Can you provide us with examples of such vendors and what portion of the trips they would be responsible for so we can consider making an exception for those specific types of trips?

Regarding the second, Air District staff has confirmed that it is feasible to implement offsets for ozone precursors (which include NOx). The Warriors are the first example of offsets required for NOx emissions for San Francisco, but they have not yet been issued their certificate of occupancy. Attached is an example MOU for a project in San Ramon that was required to do offsets as part of its environmental review. The Air District also confirmed that there are numerous projects available to reduce NOx precursors through the Clean Air Foundation. The Air District currently funds similar projects through the [Carl Moyer Program](#); in the 20th year of implementing the program, the Air District distributed [approximately \\$52 million, which provided 282 cleaner engines](#).

Thanks,

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