



SAN FRANCISCO PLANNING DEPARTMENT

DATE: October 2, 2018
TO: San Francisco Board of Supervisors
FROM: Michael Li, Environmental Planning
Joy Navarrete, Environmental Planning
Jessica Range, Environmental Planning
RE: Revisions to air quality mitigation measures for the India Basin Mixed-Use Project, Planning Department Case No. 2014-002541ENV

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

In response to comments regarding the Project's air quality emissions, Planning staff have determined that the EIR could include a requirement that diesel equipment be fueled with renewable diesel. Therefore, the following revisions are made to Mitigation Measures M-AQ-1a: Minimize Off-Road Construction Equipment Emissions and Mitigation Measure Mitigation Measure M-AQ-1e: Implement Best Available Control Technology for Operational Diesel Generators to require diesel powered equipment to use renewable diesel to the extent feasible. Use of renewable diesel would further reduce the significant and unavoidable nitrogen oxide emissions and PM_{2.5} emissions during construction and operation, but not to less than significant levels. Renewable diesel R100 has the potential to reduce particulate matter emissions by about 30 percent and NO_x emissions by 10 percent.¹ Revisions to the below mitigation measures do not require recirculation of the EIR in accordance with CEQA Guidelines section 15088.5.

The following revision is made to Mitigation Measure M-AQ-1a in Table S-2 beginning on Draft EIR page S-29 and on Draft EIR page 3.7-39. New text is shown in double underline; deleted text is shown in ~~strikethrough~~:

Mitigation Measure M-AQ-1a: Minimize Off-Road Construction Equipment Emissions

The project sponsors shall comply with the following requirements:

- A. Construction Emissions Minimization Plan.** *Before a construction permit is issued for each project phase or property, as applicable, the project sponsors shall submit construction emissions minimization plans to the Environmental Review Officer (ERO) or the ERO's designated representative for review and approval. The construction emissions minimization plans shall detail compliance with the following requirements:*

¹ California Environmental Protection Agency, *Staff Report: Multimedia Evaluation of Renewable Diesel*, May 2015. This document is available at:
http://www.arb.ca.gov/fuels/multimedia/meetings/RenewableDieselStaffReport_Nov2013.pdf.

(1) All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:

- a) Where access to alternative sources of power is reasonably available, portable diesel engines shall be prohibited.
- b) Where portable diesel engines are required because alternative sources of power are not reasonably available, all off-road equipment shall have engines that meet either EPA or ARB Tier 4 Final off-road emission standards. If engines that comply with Tier 4 Final off-road emission standards are not commercially available, then the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step-down schedules in Table M-AQ-1a-1.
 - i. For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier 4 Final engines taking into consideration factors such as (i) critical-path timing of construction; (ii) geographic proximity to the project site of equipment; and (iii) geographic proximity of access to off-haul deposit sites.
 - ii. The project sponsor shall maintain records concerning its efforts to comply with this requirement.
- c) All diesel powered engines subject to this mitigation measure and mitigation measures M-AQ-1b and M-AQ-1c shall be fueled with renewable diesel (at least 99 percent renewable diesel or R99). Exceptions to this requirement may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that renewable diesel is not feasible for a particular piece of equipment or not commercially available in the SFBAAB. With respect to renewable diesel, “commercially available” shall mean the availability taking into consideration factors such as: (i) critical path timing of construction, (ii) geographic proximity of fuel source to the project site; and (iii) cost of renewable diesel is within 10 percent of Low Sulfur Diesel #2 market price.

**TABLE M-AQ-1a-1
 OFF-ROAD EQUIPMENT COMPLIANCE STEP-DOWN SCHEDULE**

<i>Compliance Alternative</i>	<i>Engine Emissions Standard</i>	<i>Emissions Control</i>
1	Tier 4 Interim	N/A
2	Tier 3	ARB Level 3 VDECS
3	Tier 2	ARB Level 3 VDECS

How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the

project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met, etc.

- (2) The project sponsor shall require in its construction contracts that the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable State regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, and Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.*
 - (3) The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.*
 - (4) The construction emissions minimization plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include but are not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.*
 - (5) The project sponsor shall keep the construction emissions minimization plan available for public review on-site during working hours. The project sponsor shall post at the perimeter of the project site a legible and visible sign summarizing the requirements of the plan. The sign shall also state that the public may ask to inspect the construction emissions minimization plan at any time during working hours, and shall explain how to request inspection of the plan. Signs shall be posted on all sides of the construction site that face a public right-of-way. The project sponsor shall provide copies of the construction emissions minimization plan to members of the public as requested.*
- B. Reporting.** *Quarterly reports shall be submitted to the ERO or the ERO's designated representative indicating the construction phase and off-road equipment information used during each phase, including the information required in A(4).*
- (1) Within 6 months of the completion of construction activities, the project sponsor shall submit to the ERO or the ERO's designated representative a final report summarizing construction activities. The final report shall indicate the start and*

end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4).

- C. Certification Statement and On-site Requirements.** *Before the start of construction activities, the project sponsor must certify that it is in compliance with the construction emissions minimization plan, and that all applicable requirements of the plan have been incorporated into contract specifications.*

The following revision is made to Mitigation Measure M-AQ-1e Table S-2 on Draft EIR page S-34 and on Draft EIR page beginning on page 3.7-50. New text is shown in double underline; deleted text is shown in ~~strikethrough~~:

Mitigation Measure M-AQ-1e: Implement Best Available Control Technology for Operational Diesel Generators

To reduce operational NO_x and PM emissions under the proposed project or variant, the project sponsors, as applicable, shall require in applicable contracts that the operational backup diesel generators:

- (1) comply with ARB Airborne Toxic Control Measure emissions standards for model year 2008 or newer engines; and*
- (2) meet or exceed one of the following emission standards for particulate matter: (A) Tier 4 final certified engine or (B) Tier 4 interim or Tier 3 certified engine that is equipped with an ARB Level 3 VDECS. A nonverified diesel emissions control strategy may be used if the filter has the same PM reduction as the identical ARB-verified model and BAAQMD approves of its use; and*
- (3) be fueled with renewable diesel, R99, if commercially available. "Commercially available" shall mean the availability taking into consideration factors such as: (i) critical path timing of construction, (ii) geographic proximity of fuel source to the project site; and (iii) cost of renewable diesel is within 10 percent of Low Sulfur Diesel #2 market price.*

The project sponsors, as applicable, shall submit documentation of compliance with the BAAQMD NSR permitting process (Regulation 2, Rule 2, and Regulation 2, Rule 5) and the emissions standard requirement of this measure to the Planning Department for review and approval before a permit for a backup diesel generator is issued by any City agency.

Once operational, all diesel backup generators shall be maintained in good working order for the life of the equipment and any future replacement of the diesel backup generators shall be required to be consistent with these emissions specifications. The

operator of the facility at which the generator is located shall maintain records of the testing schedule for each diesel backup generator for the life of that diesel backup generator. The facility operator shall provide this information for review to the Planning Department within 3 months of a request for such information.

