

December 15, 2025

Dana Ayers
Contract Planner
City of Richmond, Community Development Department
450 Civic Center Plaza
Richmond, CA 94804

RE: Richmond Terminal Rail Expansion Project and Truck Rack Improvements Project Initial Study Mitigated Negative Declaration (IS/MND)

Dear Dana Ayers,

The Bay Area Air District (Air District) has reviewed the Richmond Terminal Expansion Project Initial Study Mitigated Negative Declaration (IS/MND) for the proposed Richmond Terminal Rail Expansion and Truck Rack Improvements Project (Project) and prepared the following comments.

The Project is located at the TransMontaigne Operating Company in the City of Richmond and proposes an expansion of rail service at the terminal in the location of the existing rail line, requiring construction of new track and associated rail infrastructure, and relocation and consolidation of the existing truck racks into one combined four-bay truck rack. By providing increased rail capacity and a new truck rack built to current standards, the proposed Project would not significantly change the existing uses on-site but would allow the terminal to offload, store, and distribute greater quantities of petroleum-based products and renewable feedstocks by ship and by truck.

As the proposed expansion of rail service and truck traffic to the TransMontaigne Operating Company may impact surrounding communities, the Air District is providing the following recommendations to assist the City of Richmond in ensuring the environmental analysis includes all potential air quality impacts on nearby communities and incorporates all feasible mitigation measures.

Environmental Justice Considerations

The Air District recommends implementation of best practices for environmental justice, health, and equity in Project planning and design, as outlined in Chapter 2 of the Air District's 2022 CEQA Guidelines¹.

This Project is located within an Air District Overburdened Community, as defined by Regulation 2: Permits, Rule 1: General Requirements, Section 243 – Overburdened Communities². The Project is also located within the boundaries of the Path to Clean Air Assembly Bill (AB) 617 (C. Garcia,

¹ Bay Area Air Quality Management District, 2022 California Environmental Quality Act (CEQA) Guidelines <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-0-cover-page-pdf.pdf?la=en>

² Bay Area Air Quality Management District. (2021, December 15). *Regulation 2: Permits, Rule 1: General Requirements*. https://www.baaqmd.gov/~media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211215_rg0201-pdf.pdf?rev=103cc60e706947d3ad1e4f5a090483c1&sc_lang=en

Chapter 136, Statutes of 2017) community that is highly impacted by local air pollution emission and exposure. The existing burdens on the community neighboring the Project are further substantiated by CalEnviroScreen (CES) 4.0. According to CES 4.0, the Project is located in Census Tract 6013378000 which is within the 71st percentile overall, 92nd percentile for pollution burden, 66th percentile for traffic, 87th percentile for Diesel Particulate Matter (DPM), 97th percentile for asthma, 70th percentile for low birth weight, and 63rd percentile for cardiovascular disease.

The Air District recommends the City of Richmond complements the identification of adjacent environmental justice communities with ground truthing to supplement technical information with local knowledge and lived experiences to help inform Project design. The Air District also encourages a robust outreach and engagement strategy to reach the surrounding community. This will ensure the Project addresses environmental justice considerations and human health impacts that are priority community concerns. The Air District's 2025 CEQA Guidelines Supplemental³ provides additional guidance for implementing best practices for centering environmental justice, health, and equity in environmental analyses.

Air Quality

The Air District has identified several areas where the IS/MND could better clarify air impacts and has the following recommendations:

- **Quantify and Characterize Emissions.** Because the Project will result in the expansion of rail operations and an increase in renewable feedstock throughput, the IS/MND should analyze emissions impacts as a result of any piping and fugitive components such as pumps, valves, connectors, or loading arm nozzles to accommodate these throughput changes.
- **Analyze Local Risks and Hazards.** To capture potential localized air quality impacts, the IS/MND briefly discusses potential impacts to residential receptors, but it should also consider impacts to nearby workers. The Air District has provided guidance on analyzing local risks and hazards, which recommends that lead agencies consider impacts at “worker receptors,” which “are off-site locations where people work, including indoor and outdoor areas and commercial/industrial areas currently zoned or planned to be zoned for manufacturing, light or heavy industry, office, or retail activity.”⁴ Such an analysis is especially valuable in this location for several reasons. Third, neighboring workplaces, such as the CEMEX Richmond Cement Terminal, appear likely to require workers to spend many hours outdoors. And last, neighboring facilities also conduct operations that have localized air quality impacts, so workers are already likely exposed to significant cumulative, localized air pollution during their workday. We therefore recommend following our guidance and conducting a more rigorous local risks and hazards analysis that incorporates impacts to workers.

³ Bay Area Air Quality Management District, 2025 California Environmental Quality Act (CEQA) Guidelines Supplemental, Guidance for Implementing Best Practices for Centering Environmental Justice, Health, and Equity in CEQA https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/tools/california-environmental-quality-act-guidelines-supplemental_april-2025-pdf.pdf?rev=31b9ea743b354b25b67b4cd244d0a322&sc_lang=en

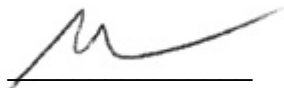
⁴ Bay Area Air Quality Management District, 2022 California Environmental Quality Act (CEQA) Guidelines, Appendix E, https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en.

- **Truck Routes.** The City of Richmond should work with the Project Sponsor to design, clearly mark, and implement truck routes that avoid residential neighborhoods. These routes should avoid residential areas north of Interstate 580 and be incorporated as a Project condition of approval.

Air District Resources and Permit Requirements

- **Air District CEQA Guidelines and Resources.** The Air District's CEQA Guidelines provide guidance for recommended thresholds of significance. Additionally, the CEQA Guidelines include appendices to assist Lead Agencies in evaluating emissions and mitigating impacts. Further, the Air District publishes several tools and resources to assist Lead Agencies in analyzing air quality impacts. These resources can be found on the Air District's CEQA website at <https://www.baaqmd.gov/en/plans-and-climate/california-environmental-quality-act-ceqa>.
- **Air District Permit and Regulations.** Certain aspects of the Project may require a permit from the Air District, such as loading rack changes/modifications/alterations. Please contact Chris Ablaza, (cablaza@baaqmd.gov), to discuss permit requirements.

Thank you for the opportunity to provide comments on this Project. Please contact Samuel Garcia at sgarcia@baaqmd.gov for any questions.



Greg Nudd, Deputy Executive Officer of Policy
Bay Area Air District

Cc: Director Dionne Adams
Director Ken Carlson
Director John Gioia
Director Gabe Quinto