



December 15, 2025

City of Richmond
Community Development, Planning Division
Attn: Dana Ayer, AICP, Contract Planner
450 Civic Center Plaza
Richmond, CA. 94804
Email: dayers@migcom.com

Re: Comments on Draft Initial Study / TransMontaigne Richmond Terminal Rail Expansion and Truck Rack Improvements Project

Dear Planning Department:

The Marina Bay Neighborhood Council (MBNC), on behalf of concerned residents and adjacent communities submits the following formal comments on the Draft Initial Study/Mitigated Negative Declaration (“Draft IS/MND”) for the TransMontaigne Richmond Terminal Rail Expansion and Truck Rack Improvements Project (“Project”).

1. The Draft IS/MND improperly characterizes the surrounding area as industrial and fails to analyze impacts to nearby residential and recreational receptors

The Draft IS/MND repeatedly characterize the area as “heavily industrialized,” while omitting meaningful analysis of nearby residential neighborhoods, parks, and public access areas. CEQA requires analysis based on **existing environmental conditions and sensitive receptors**, not zoning classifications alone.

Marina Bay is a mixed-use residential community with thousands of residents, multi-family housing, parks, the Bay Trail, Ferry Terminal riders, commuters, children traveling to and from school and continuous pedestrian and cyclist activity. These receptors are not treated as primary receptors in the Draft IS/MND’s impact analyses. By relying on industrial assumptions, the Draft IS/MND understates human exposure and risk, contrary to CEQA requirements.

2. Air quality and health risk analyses are incomplete

The Draft IS/MND concludes air quality impacts are “less than significant,” yet relies primarily on criteria pollutant emissions and **does not include a project-specific Health Risk Assessment (HRA)** for toxic air contaminants associated with bulk liquid terminals.

The Draft IS/MND also fails to analyze **cumulative air quality and health impacts**, despite Richmond’s well-documented existing pollution burden, in violation of CEQA Guidelines §15130. The Project would increase railcars, truck trips and marine activity, yet no cumulative exposure analysis is provided

3. Environmental Justice analysis is absent and inconsistent with City policy and state law

The City of Richmond has adopted an Environmental Justice Element pursuant to SB 1000; however, the Draft IS/MND contains **no substantive Environmental Justice analysis** evaluating whether the Project



would increase pollution burdens on nearby Environmental Justice communities, including Santa Fe, Coronado, Richmond Annex, and Iron Triangle.

This omission is inconsistent with the City's General Plan Environmental Justice Element and CEQA's requirement to evaluate disproportionate impacts on affected communities.

4. Hazardous materials and emergency response impacts are understated

The Project expands rail and truck handling of hazardous materials, yet the Draft IS/MND omits critical analyses, including:

- Evaluation of reasonable worst-case release scenarios despite increased hazardous material throughput.
- Assessment of sea-level rise and flooding risk, even though the site is located on the waterfront and CEQA Appendix G requires such analysis; and
- Analysis of evacuation constraints affecting Marina Bay neighborhoods.

5. Noise analysis does not reflect actual baseline conditions or cumulative conditions

The noise analysis relies on limited monitoring and generalized thresholds and does not adequately evaluate:

- Nighttime operational noise from 24-hour terminal activity;
- Cumulative noise from rail, truck, marine, and adjacent industrial sources; or
- Impacts to nearby residences, parks, and recreational users.

Without robust baseline data - including consistency with the City General Plan Public Safety and Noise policies - and cumulative analysis, the "less than significant" noise conclusion is unsupported.

6. Mitigation measures are inadequate or absent

Where impacts are deemed less than significant, the Draft IS/MND required **no mitigation**, despite reasonably foreseeable increases in emissions, noise, and risk. CEQA requires feasible mitigation where impacts may occur, not reliance on unsupported conclusions of insignificance.

Request for Action

As prepared, the Draft IS/MND is **legally and technically inadequate** and does not comply with CEQA (Pub. Res. Code §21000 et seq.), the CEQA Guidelines, or the City of Richmond's adopted Environmental Justice Element (2023) and fails to meaningfully address risks to Marina Bay residents and nearby communities. Approval of the Project based on this document would be premature and irresponsible for the City of Richmond to allow this expansion. We request a full Environmental Impact Report (EIR).

Sincerely,
Margarita Mitas – MBNC President