



# MEMORANDUM

<b>Date:</b> February 25, 2019	
<b>To:</b> Afshan Hamid, Shannon Eckmeyer	<b>Organization:</b> City of Vallejo
<b>CC:</b> Dan Marks, Darcey Rosenblatt, Lora Granovsky	
<b>From:</b> Lisa Plowman	<b>Title:</b> Planning Manager
<b>Project Name:</b> VTM/Orcem Contract Planning	<b>Project Number:</b> 1414074
<b>Topic:</b> Response to Attorney General Letter	

In response to the letter from the Attorney General's office on the VMT/Orcem project, the consultant team made a series of revisions to the Final EIR. These changes include the following:

- Reviewed all mitigations and added considerable detail to mitigation measures which appear in track changes in the individual sections:
  - MM 3.1-1 – Aesthetics
  - MM 3.2-2 – Air Quality
  - MM 3.3-10 – Biological Resources
  - MM 3.7-1b – Hazards and Hazardous Materials
  - MM 3.3-10 - Noise
- Dudek provided the following information regarding cumulative impacts to the AQ Section:

*“Although there are other industrial sources in the area, such as refineries, freeways, and other marine traffic, they were deemed to be either too far from the project site to be considered relevant for the purposes of a cumulative risk assessment or not relevant. For example, the closest refinery, in Rodeo, California, is located approximately 2 miles away. The I-80 freeway is approximately 3,000 feet away. The I-780 is approximately 1 mile away. Since the CARB Land Use Handbook considers 1,000 feet to an adequate separation distance between freeways and sensitive receptors (CARB 2005), it was determined that freeways located further than this distance would not contribute significantly to a cumulative impact in the vicinity of the project. Impacts from*

*non-project marine traffic in the project vicinity are not possible to quantify without knowledge of specific shipping activities. However, CalEnviroScreen, OEHHA's mapping, which identifies California communities affected by pollution, ranks the area in the project vicinity as being in the best 20% of California for PM2.5 air quality and 25% of California for DPM (OEHHA 2018). These indicators represent how much PM2.5 and DPM are emitted into the air within and nearby the populated parts of the project vicinity.*

*The BAAQMD considers a project to have a cumulatively considerable impact if the aggregate total of past, present and foreseeable future sources within a 1,000-foot radius from the fence line plus the contribution from the project exceeds the significance thresholds.*

*The maximum mitigated excess cancer risk from the Project (Orcem and VMT operation) was calculated to be less than 10.0 in a million, which is below the BAAQMD significance threshold for an individual project. Acute and chronic noncancer health effects would also be below the BAAQMD significance threshold of a hazard index greater than 1.0. “*

- Lora Granovsky prepared a memo explaining how the applicants changed aspects of the project and some assumptions in order to reduce emissions and air quality impacts. In addition, the memo outlines the new emissions estimates. The memo – almost in its entirety – was added to the ROA Air Quality Section.
- Clarified the references to State Lands Commission and their jurisdiction
- Added information to the ROA cumulative sections.