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Peter J. Schrappen, CAE
Pacific Region Vice President & Regional Team Lead

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City of Richmond Planning Commission
450 Civic Center Plaza
Richmond, CA 94804

RE: Support for the Initial Study/
Mitigated Negative Declaration –
TransMontaigne Richmond Terminal
Rail Expansion and Truck Rack
Improvements Project (PLN23-306)

Dear Chair and Members of the Planning Commission:

The American Waterways Operators (AWO) is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. As the largest segment of the nation's 40,000-vessel domestic maritime fleet, our industry safely and efficiently moves 665 million tons of cargo each year and enables the flow of goods on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes.

AWO supports the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the TransMontaigne Richmond Terminal Rail Expansion and Truck Rack Improvements Project.

The Richmond Terminal has operated within the city of Richmond's historic working waterfront for nearly a century, dating back to the industrial legacy of the Kaiser Shipyards. Facilities like this are the lynchpin of the working waterfront infrastructure necessary to support maritime commerce, tug and barge services, vessel operations, rail connectivity, and the thousands of skilled maritime and industrial careers tied to these operations throughout the Bay Area.

Marine terminals such as the Richmond Terminal are essential components of California's maritime transportation system and broader supply chain network. Waterfront industrial facilities play a critical role in ensuring the safe and efficient movement of energy products, renewable fuels, and other commodities that support California's economy, supply chain, and communities. Maintaining a reliable and modernized network of marine terminals is increasingly important as California transitions toward lower-carbon fuels. Nationally, the US Maritime Administration and

port communities are investing in marine highway initiatives to reduce congestion on roads and highways. Modern and well-maintained marine terminals — including Richmond — are the critical infrastructure that makes this possible.

This project modernizes the existing legacy industrial terminal; it does not create a new industrial use. Investments in upgraded rail infrastructure, improved truck circulation, and modernized terminal operations are critical to improving efficiency, reliability, and environmental performance at existing facilities. Responsible reinvestment in aging waterfront infrastructure reduces operational impacts and ensures these facilities continue to support today's supply chain needs safely and efficiently. When local governments allow industrial waterfront land to shift to other uses, they rarely recover that capacity, as has been demonstrated at the federal, state, and local levels.

Other regions offer cautionary examples. In New York City, decades of converting maritime-industrial waterfront to residential and commercial uses have forced the city to move nearly 90 percent of its freight by truck. The New York City Economic Development Corporation estimates this reliance on a single mode of transportation will cost the city an estimated \$27 billion over the next 30 years and significantly increase emissions. The city is now investing heavily to reverse this reliance through its Blue Highways marine freight initiative, reactivating strategic waterfront sites for freight and strengthening intermodal connections. The draft IS/MND for this project similarly notes that increased vessel calls could reduce anticipated truck traffic.

Projects that reinvest in existing marine terminals strengthen supply chain resilience and support the maritime, logistics, maintenance, and industrial careers that have long been part of Richmond's economy.

The IS/MND reflects a comprehensive California Environmental Quality Act review and demonstrates that identified impacts can be mitigated to less-than-significant levels. The document evaluates transportation, air quality, hazardous materials, biological resources, noise, and other factors, and incorporates mitigation measures appropriate for an existing industrial waterfront facility.

For these reasons, AWO respectfully urges the Planning Commission to support the IS/MND and approve the TransMontaigne Richmond Terminal modernization project.

Sincerely,

A handwritten signature in black ink that reads "Peter Schrappen". The signature is written in a cursive, flowing style with a large initial "P".

Peter Schrappen
Pacific Region Vice President & Regional Team Lead