Consistency with General Plan Goals, Objectives, and Policies

Goals, Objectives, and Policies	Analysis	Consistency
The Bay Plan		
Fish, Other Aquatic Organisms, and Wildlife		
Policy 1. To assure the benefits of fish, other aquatic organisms and wildlife for future generations, to the greatest extent feasible, the Bay's tidal marshes, tidal flats, and subtidal habitat should be conserved, restored and increased.	**VMT:** The VMT component of the project would involve the removal of a deteriorated timber wharf and construction of a modern deep-water terminal, including wharf improvements, which would impact subtidal habitat in the project area. As described in Section 3.3, Biological Resources, based on the small area affected, the loss of subtidal and intertidal habitat due to expansion of the wharf would not be significantly detrimental to the bay marine community. Following the deposition of fine sand-mud sediments due to dredging, recovery would begin almost immediately, and the benthic community inhabiting those sediments would be expected to recover to pre-dredging composition and abundances within a few months to less than 2 years. **Orcem:** The Orcem component of the project would not involve any changes to the Bay's tidal marshes, tidal flats, and subtidal habitat.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 2. Specific habitats that are needed to conserve, increase or prevent the extinction of any native species, species threatened or endangered, species that the California Department of Fish and Game has determined are candidates for listing as endangered or threatened under the California Endangered Species Act, or any species that provides substantial public benefits, should be protected, whether in the Bay or behind dikes.	**VMT:** The VMT component of the project would involve the removal of a deteriorated timber wharf and construction of a modern deep-water terminal, including wharf improvements, which would impact subtidal habitat in the project area. As described in Section 3.3, Biological Resources, the proposed wharf-and public access improvements would result in the permanent loss of approximately 1.04 acres of potential foraging habitat for sensitive fish species due to in-bay fill and shoreline	Consistent

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Goals, Objectives, and Policies	Analysis	Consistency
	modification for wharf construction and the temporary degradation of an additional 9.5 acres due primarily to dredging; however, the substrate at the site is not considered to be of high quality as a foraging habitat and the incidence of sensitive fish species at the site is low. **Orcem:** The Orcem component of the project would not involve any changes to habitats within the Bay.	
Water Quality		
Policy 1. Bay water pollution should be prevented to the greatest extent feasible. The Bay's tidal marshes, tidal flats, and water surface area and volume should be conserved and, whenever possible, restored and increased to protect and improve water quality. Fresh water inflow into the Bay should be maintained at a level adequate to protect Bay resources and beneficial uses.	**VMT:** As described in Section 3.8, Hydrology and Water Quality, construction of the VMT facilities could result in significant impacts to water quality. However, these impacts would be subject to appropriate mitigation measures as described in Section 3.3 and Section 3.8, which would ensure impacts remain less than significant. Once operational, VMT would be subject to the Stormwater Control Plan, which has been designed to reduce stormwater runoff and minimize Bay water pollution; therefore, impacts would be less than significant. **Orcem:** As described in Section 3.8, Hydrology and Water Quality, the Orcem project component would not result in any significant impacts to water quality during construction with implementation of a construction SWPPP. Once operational, Orcem would be subject to the Stormwater Control Plan, which has been designed to reduce stormwater runoff and	Consistent

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Goals, Objectives, and Policies	Analysis	Consistency
	minimize Bay water pollution; therefore, impacts would be less than significant.	
Policy 3. New projects should be sited, designed, constructed and maintained to prevent or, if prevention is infeasible, to minimize the discharge of pollutants into the Bay by: (a) controlling pollutant sources at the project site; (b) using construction materials that contain non-polluting materials; and (c) applying appropriate, accepted and effective best management practices, especially where water dispersion is poor and near shellfish beds and other significant biotic resources.	**VMT and Orcem:** Refer to response to Water Quality Policy 1, above.	Consistent
Policy 6. To protect the Bay and its tributaries from the water quality impacts of nonpoint source pollution, new development should be sited and designed consistent with standards in municipal stormwater permits and state and regional stormwater management guidelines, where applicable, and with the protection of Bay resources. To offset impacts from increased impervious areas and land disturbances, vegetated swales, permeable pavement materials, preservation of existing trees and vegetation, planting native vegetation and other appropriate measures should be evaluated and implemented where appropriate.	**VMT and Orcem:** Refer to response to Water Quality Policy 1, above.	Consistent
Policy 7. Whenever practicable, native vegetation buffer areas should be provided as part of a project to control pollutants from entering the Bay, and vegetation should be substituted for rock riprap, concrete, or other hard surface shoreline and bank erosion control methods where appropriate and practicable.	**VMT:** As described in Section 3.8, Hydrology and Water Quality, the VMT project component provides for the construction of vegetated swales, a storm drain system, and bio-basin for detention and filtration (see Figure 3.8-2) with the capacity to handle up to 100-year storm volumes. **Orcem:** As described in Section 3.8, Hydrology and Water Quality, the Orcem project component would utilize a drainage system with stormwater catchment and treatment tanks in-lieu of vegetated swales within the limited available space on-site.	Consistent
Water Surface Area and Volume		
Policy 1. The surface area of the Bay and the total volume of water should be kept as large as possible in order to maximize active oxygen	**VMT:** A small area of fill would be required in order to achieve necessary design parameters for	Potentially Consistent. The final consistency determination will be made by BCDC.

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Goals, Objectives, and Policies	Analysis	Consistency
interchange, vigorous circulation, and effective tidal action. Filling and diking that reduce surface area and water volume should therefore be allowed only for purposes providing substantial public benefits and only if there is no reasonable alternative.	marine logistics on the VMT Site. The proposed solid fill areas, approximately 150,905 square feet in total for the wharf, would be used as back area for the loading and unloading of cargo and as a lay-down area for marine construction materials. The proposed fill would allow for the reuse of an existing wharf area for modern cargo loading and unloading, which would provide a substantial public benefit by increasing the capacity for cargo shipping in the City of Vallejo. **Orcem:** The Orcem project component would not involve any filling or diking of the Bay.	
Policy 2. Water circulation in the Bay should be maintained, and improved as much as possible. Any proposed fills, dikes, or piers should be thoroughly evaluated to determine their effects upon water circulation and then modified as necessary to improve circulation or at least to minimize any harmful effects.	**VMT:** As described above, the VMT project component would require a small amount of fill and would involve the construction of a new wharf structure in the Bay. The proposed wharf structure would replace an existing deteriorated wharf that was previously used by General Mills. The impacts of the proposed fill and wharf structure are analyzed throughout this Environmental Impact Report (EIR), and mitigation is provided to reduce or avoid impacts to the extent practicable. **Orcem:** The Orcem project component would not involve any filling or diking of the Bay.	Consistent

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Goals, Objectives, and Policies	Analysis	Consistency
Tidal Marshes and Tidal Flats		
Policy 1. Tidal marshes and tidal flats should be conserved to the fullest possible extent. Filling, diking, and dredging projects that would substantially harm tidal marshes or tidal flats should be allowed only for purposes that provide substantial public benefits and only if there is no feasible alternative.	**VMT:** As described above, a small area of fill would be required in order to achieve necessary design parameters for marine logistics on the VMT Site. The proposed fill would allow for the reuse of an existing wharf area, which would provide a substantial public benefit by increasing the capacity for cargo shipping in the City of Vallejo. There is no feasible alternative site on the Bay that could accommodate the proposed VMT facilities. **Orcem:** The Orcem project component would not involve any filling or diking of tidal marshes or tidal flats.	Consistent
Policy 2. Any proposed filling, diking, or dredging project should be thoroughly evaluated to determine the effect of the project on tidal marshes and tidal flats, and designed to minimize, and if feasible, avoid any harmful effects.	**VMT:** As described previously, the VMT project component would require a small amount filling, diking, and dredging. The impacts of the proposed fill, diking, and dredging are analyzed throughout this EIR, and mitigation is provided to reduce or avoid impacts to the extent practicable. **Orcem:** The Orcem project component would not involve any filling or diking of tidal marshes or tidal flats.	Consistent

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Policy 3. Projects should be sited and designed to avoid, or if avoidance is infeasible, minimize adverse impacts on any transition zone present between tidal and upland habitats. Where a transition zone does not exist and it is feasible and ecologically appropriate, shoreline projects should be designed to provide a transition zone between tidal and upland habitats.	**VMT:** The VMT project component would involve development within the transition zone between tidal and upland habitats; however, the VMT project component would minimize adverse impacts on the transition zone by redeveloping a site that has previously been disturbed and developed. In addition, impacts to the transition zone would be avoided and minimized to the maximum extent feasible. **Orcem:** The Orcem project component would not involve any impacts on a transition zone between tidal and upland habitats.	Consistent
Subtidal Areas		
Policy 1. Any proposed filling or dredging project in a subtidal area should be thoroughly evaluated to determine the local and Bay-wide effects of the project on: (a) the possible introduction or spread of invasive species; (b) tidal hydrology and sediment movement; (c) fish, other aquatic organisms and wildlife; (d) aquatic plants; and (e) the Bay's bathymetry. Projects in subtidal areas should be designed to minimize and, if feasible, avoid any harmful effects.	**VMT:** The VMT project component would involve the removal of a deteriorated timber wharf and construction of a modern deep-water terminal, which would require filling and dredging. As described in Section 3.3, Biological Resources, sediment deposition from dredging for the VMT project would result in the temporary degradation of approximately 9.5 acres of benthic habitat and the permanent loss of approximately 1.07 acres of subtidal soft substrate. However, impacts would remain less than significant. Ongoing dredging activities for maintenance would be required on a periodic basis an estimated average for 5 days every 4 years, and would be subject to a U.S. Army Corps of Engineers (USACE) permit. **Orcem:** The Orcem project component would not involve any filling or dredging.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 2. Subtidal areas that are scarce in the Bay or have an abundance and diversity of fish, other aquatic organisms and wildlife (e.g., eelgrass	**VMT:** The VMT project component would involve the removal of a deteriorated timber	Potentially Consistent. The final consistency determination will be made by BCDC.

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beds, sandy deep water or underwater pinnacles) should be conserved. Filling, changes in use, and dredging projects in these areas should therefore be allowed only if: (a) there is no feasible alternative; and (b) the project provides substantial public benefits.	wharf and construction of a modern deep-water terminal, which would require filling and dredging. As described in Section 3.3, Biological Resources, the low intertidal and subtidal area of the Napa River identified to be affected by the wharf, consists predominantly of a tidal mudflat that does not support any eelgrass, widgeon grass, or other submerged aquatic vegetation and provides only low quality foraging habitat for fish species. **Orcem:** The Orcem project component would not involve any filling or dredging.	
Climate Change		
Policy 2. When planning shoreline areas or designing larger shoreline projects, a risk assessment should be prepared by a qualified engineer and should be based on the estimated 100-year flood elevation that takes into account the best estimates of future sea level rise and current flood protection and planned flood protection that will be funded and constructed when needed to provide protection for the proposed project or shoreline area. A range of sea level rise projections for mid-century and end of century based on the best scientific data available should be used in the risk assessment. Inundation maps used for the risk assessment should be prepared under the direction of a qualified engineer. The risk assessment should identify all types of potential flooding, degrees of uncertainty, consequences of defense failure, and risks to existing habitat from proposed flood protection devices.	**VMT and Orcem:** As described in Section 3.6, Greenhouse Gas Emissions, of this EIR, a sea level rise (SLR) assessment was prepared for the proposed project by Moffatt & Nichol. The proposed project would be designed to be resilient to SLR as projected up to 2088 in the California Climate Action Team's State of California SLR Guidance Document.	Consistent
Policy 3. To protect public safety and ecosystem services, within areas that a risk assessment determines are vulnerable to future shoreline flooding that threatens public safety, all projects—other than repairs of existing facilities, small projects that do not increase risks to public safety, interim projects and infill projects within existing urbanized areas—should be designed to be resilient to a mid-century sea level rise projection. If it is likely the project will remain in place longer than mid-century, an adaptive	**VMT and Orcem:** The potential for sea level rise and associated risks has been evaluated in Section 3.6, Greenhouse Gas Emissions, of this EIR. Based on the SLR predictions in the California Climate Action Team's State of California SLR Guidance Document, the	Consistent

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management plan should be developed to address the long-term impacts that will arise based on a risk assessment using the best available science-based projection for sea level rise at the end of the century.	proposed project would be resilient to sea level rise as projected up to 2088.	
Safety of Fills		
Policy 2. Even if the Bay Plan indicates that a fill may be permissible, no fill or building should be constructed if hazards cannot be overcome adequately for the intended use in accordance with the criteria prescribed by the Engineering Criteria Review Board.	**VMT:** As described in Section 3.5, Geology and Soils, the VMT project component would involve fill; however, a design-level geotechnical study would be prepared and compliance with all recommendations contained in the study would ensure that hazards related to use of fill would be minimized. **Orcem:** The Orcem project component would not involve any fill of the Bay.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 3. To provide vitally needed information on the effects of earthquakes on all kinds of soils, installation of strong-motion seismographs should be required on all future major land fills. In addition, the Commission encourages installation of strong-motion seismographs in other developments on problem soils, and in other areas recommended by the U.S. Geological Survey, for purposes of data comparison and evaluation.	**VMT:** The VMT project component would involve approximately 150,905square feet in total of Bay–Delta waters surface area fill, involving a total volume of 21,200 cubic yards of engineered fill; however, this is not considered a major fill. **Orcem:** The Orcem project component would not include any major fills.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 4. Adequate measures should be provided to prevent damage from sea level rise and storm activity that may occur on fill or near the shoreline over the expected life of a project. The Commission may approve fill that is needed to provide flood protection for existing projects and uses. New projects on fill or near the shoreline should either be set back from the edge of the shore so that the project will not be subject to dynamic wave energy, be built so the bottom floor level of structures will be above a 100-year flood elevation that takes future sea level rise into account for the expected life of the project, be specifically designed to tolerate periodic flooding, or employ other effective means of addressing the impacts of future sea level rise and storm activity. Rights-of-way for levees or other	**VMT and Orcem:** The potential for sea level rise and associated risks has been evaluated in Section 3.6, Greenhouse Gas Emissions, of this EIR. The structures associated with the proposed project most vulnerable to storm activity and SLR would be the proposed ~~Phase 1~~ wharf. The wharf would be constructed to accommodate a 100-year event based on SLR predictions in the California Climate Action Team's State of California SLR Guidance Document.	Potentially Consistent. The final consistency determination will be made by BCDC.

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structures protecting inland areas from tidal flooding should be sufficiently wide on the upland side to allow for future levee widening to support additional levee height so that no fill for levee widening is placed in the Bay.		
Dredging		
Policy 1. Dredging and dredged material disposal should be conducted in an environmentally and economically sound manner. Dredgers should reduce disposal in the Bay and certain waterways over time to achieve the LTMS [Long-Term Management Strategy] goal of limiting in-Bay disposal volumes to a maximum of one million cubic yards per year. The LTMS agencies should implement a system of disposal allotments to individual dredgers to achieve this goal only if voluntary efforts are not effective in reaching the LTMS goal. In making its decision regarding disposal allocations, the Commission should confer with the LTMS agencies and consider the need for the dredging and the dredging projects, environmental impacts, regional economic impacts, efforts by the dredging community to implement and fund alternatives to in-Bay disposal, and other relevant factors. Small dredgers should be exempted from allotments, but all dredgers should comply with policies 2 through 12.	**VMT:** On the water side of the proposed VMT wharf, the channel would be dredged to a depth of -38.0 feet mean lower low water (MLLW) (approximately 89,800 cubic yards for Phase 1, and subject to a permit from the USACE. This depth would subsequently be maintained through a USACE Section 10 Maintenance Permit. Beneficial use of dredge material would be sought on site, and any material unfit for reuse would be deposited at the Carquinez disposal site. **Orcem:** The Orcem project component would not involve any dredging.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 3. Dredged materials should, if feasible, be reused or disposed outside the Bay and certain waterways. Except when reused in an approved fill project, dredged material should not be disposed in the Bay and certain waterways unless disposal outside these areas is infeasible and the Commission finds: (a) the volume to be disposed is consistent with applicable dredger disposal allocations and disposal site limits adopted by the Commission by regulation; (b) disposal would be at a site designated by the Commission; (c) the quality of the material disposed of is consistent with the advice of the San Francisco Bay Regional Water Quality Control Board and the inter-agency Dredged Material Management Office (DMMO); and (d) the period of disposal is consistent with the advice of the California Department of Fish and Game, the U.S. Fish and Wildlife Service and the National Marine Fisheries Service.	**VMT:** As described above, the VMT project component would require dredging subject to a permit from USACE. This depth would subsequently be maintained through a USACE Section 10 Maintenance Permit. Beneficial use of dredge material would be sought on-site, and any material unfit for reuse would be deposited at the Carquinez disposal site. **Orcem:** The Orcem project component would not involve any dredging.	Potentially Consistent. The final consistency determination will be made by BCDC.

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Policy 4. If an applicant proposes to dispose dredged material in tidal areas of the Bay and certain waterways that exceeds either disposal site limits or any disposal allocation that the Commission has adopted by regulation, the applicant must demonstrate that the potential for adverse environmental impact is insignificant and that non-tidal and ocean disposal is infeasible because there are no alternative sites available or likely to be available in a reasonable period, or because the cost of disposal at alternate sites is prohibitive. In making its decision whether to authorize such in-Bay disposal, the Commission should confer with the LTMS agencies and consider the factors listed in Policy 1.	**VMT:** As described above, the VMT project component would require dredging subject to a permit from USACE. Beneficial use of dredge material would be sought on site, and any material unfit for reuse would be deposited at the Carquinez disposal site. **Orcem:** The Orcem project component would not involve any dredging.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 6. Dredged materials disposed in the Bay and certain waterways should be carefully managed to ensure that the specific location, volumes, physical nature of the material, and timing of disposal do not create navigational hazards, adversely affect Bay sedimentation, currents or natural resources, or foreclose the use of the site for projects critical to the economy of the Bay Area.	**VMT:** As described above, the VMT project component would require dredging subject to a permit from USACE. Beneficial use of dredge material would be sought on site, and any material unfit for reuse would be deposited at the Carquinez disposal site. **Orcem:** The Orcem project component would not involve any dredging.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 7. All proposed channels, berths, turning basins, and other dredging projects should be carefully designed so as not to undermine the stability of any adjacent dikes, fills or fish and wildlife habitats.	**VMT:** As described above, the VMT project component would require dredging subject to a permit from USACE. As described in Section 3.8 of this EIR, Hydrology and Water Quality, the wharf and the new area of engineered fill would not substantially change the course of the Mare Island Strait. As described in Section 3.3, Biological Resources, with adherence to established BMPs, work windows, and mitigation measures, the proposed dredging activities would not result in a significant detrimental effect on fish or marine wildlife habitat.	Potentially Consistent. The final consistency determination will be made by BCDC.

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	Orcem: The Orcem project component would not involve any dredging.	
Policy 9. To protect underground fresh water reservoirs (aquifers): (a) all proposals for dredging or construction work that could penetrate the mud "cover" should be reviewed by the San Francisco Bay Regional Water Quality Control Board and the State Department of Water Resources; and (b) dredging or construction work should not be permitted that might reasonably be expected to damage an underground water reservoir. Applicants for permission to dredge should provide additional data on groundwater conditions in the area of construction to the extent necessary and reasonable in relation to the proposed project.	**VMT:** As described above, the VMT project component would require dredging subject to a permit from USACE. Approval would also be sought from the San Francisco Bay Regional Water Quality Control Board and the State Department of Water Resources. As described in Section 3.8 of this EIR, Hydrology and Water Quality dewatering during the construction period for both projects could be required. However, the dewatering would only result in a temporary and highly localized effect on the uppermost water-bearing zones related to near-surface excavations which are not accessed by adjacent property owners as a source of water supply. **Orcem:** The Orcem project component would not involve any dredging.	Potentially Consistent. The final consistency determination will be made by BCDC.
Water-Related Industry		
Policy 1. Sites designated for both water-related industry and port uses in the Bay Plan should be reserved for those industries and port uses that require navigable, deep water for receiving materials or shipping products by water in order to gain a significant transportation cost advantage.	**VMT and Orcem:** The VMT project site is not designated as a Port priority use area in the San Francisco Bay Plan and is not discussed in the Seaport Plan. However. the proposed project consists of marine terminal uses that require navigable, deep water for shipping and receiving materials and cargo. The project would ensure the continuation of such uses in a location historically used for water-related industry .It may be deemed a temporary us by BCDC	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 2. Linked industries, water-using industries, and industries which gain only limited economic benefits by fronting on navigable water, should be located in adjacent upland areas. However, pipeline corridors serving such facilities may be permitted within water-related industrial priority use	**VMT:** The VMT project component consists of marine terminal uses that require navigable, deep water for shipping and receiving materials and cargo. These uses require access to	Potentially Consistent. The final consistency determination will be made by BCDC

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areas, provided pipeline construction and use does not conflict with present or future water-transportation use of the site.	navigable waters and the shipping aspects of the project may not be port specific and trucking and rail would be feasible in upland areas. **Orcem:** The proposed Orcem facilities would be developed in the upland area adjacent to the proposed marine terminal. The Orcem component is dependent on proximity to the water and use of the VMT Terminal for import of its primary raw material, granulated blast furnace slag (GBFS).	
Policy 4. Water-related industry and port sites should be planned and managed so as to avoid wasteful use of the limited supply of waterfront land. The following principles should be followed to the maximum extent feasible in planning for water-related industry and port use: a. Extensive use of the shoreline for storage of raw materials, fuel, products, or waste should not be permitted on a long-term basis. If required, such storage areas should generally either be at right angles to the main direction of the shoreline or be as far inland as feasible, so other use of the shoreline may be made possible. b. Where large acreages are available, site planning should strive to provide access to the shoreline for all future plants and port facilities that might locate in the same area. (As a general rule, therefore, the longest dimension of plant sites should be at right angles to the shoreline.) Marine terminals should also be shared as much as possible among industries and port uses. c. Waste treatment ponds for water-related industry and port uses should occupy as little land as possible, be above the highest recorded level of tidal action, and be as far removed from the shoreline as possible. d. Any new highways, railroads, or rapid transit lines in existing or future water-related industrial and port areas should be located sufficiently far away from the waterfront so as not to interfere with industrial use of the waterfront. New access roads to waterfront industrial and port areas	**VMT and Orcem:** : The VMT project site is not designated as a Port priority use area in the San Francisco Bay Plan and is not discussed in the Seaport Plan. However, the proposed project has been planned to take advantage of an existing industrial site and marine facilities that were historically used by General Mills. BCDC has determined that the use of the site for cargo would be consistent with the Bay Plan, provided that the use is interim in nature and does not preclude future use of the site for water-related industry. Interim uses are allowed for a limited period typically ranging from 5 years to 10 years, depending on the proposed use and conditions of the site. In some cases, the interim use is renewable by permit amendment.1 a. The shoreline areas of the project site would be used for a modern deep-water terminal, including a wharf and laydown area. Storage areas and other structures would be located in the upland areas, in the	Potentially Consistent. The final consistency determination will be made by BCDC.

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should be approximately at right angles to the shoreline, topography permitting.	general location of the existing structures on the site. b. The VMT project component has been designed to maximize the ability of the marine terminal to expand in the future, while also minimizing environmental impacts. c. The project does not involve any waste treatment ponds. d. The project does not propose any new highways, railroads, or rapid transit lines; however, it would upgrade the existing roads and railroads within and adjacent to the site to enable the use of these existing facilities.	
Policy 5. Water-related industry and port uses should be planned so as to make the sites attractive (as well as economically important) uses of the shoreline. The following criteria should be employed to the maximum extent possible: a. Air and water pollution should be minimized through strict compliance with all relevant laws, policies and standards. Mitigation, consistent with the Commission's policy concerning mitigation, should be provided for all unavoidable adverse environmental impacts. b. When bayfront hills are used for water-related industries, terracing should generally be required and leveling of the hills should not be permitted. c. Important Bay overlook points, and historic areas and structures that may be located in water-related industrial and port areas, should be preserved and incorporated into the site design, if at all feasible. In addition, shoreline not actually used for shipping facilities should be used for some type of public access or recreation, to the maximum extent feasible. Public areas need not be directly accessible by private automobiles with attendant parking lots and driveways; access may be provided by hiking paths or by forms of public transit such as elephant trains or aerial tramways.	**VMT and Orcem:** The proposed project has been planned to take advantage of an existing industrial site and marine facilities that were historically used by General Mills. a. Air and water pollution associated with the proposed project are discussed in Sections 3.2 and 3.7 of this EIR, respectively. As described in these sections, the proposed project has been designed to minimize air and water pollution in compliance with applicable laws and regulations. b. The site does not include any bayfront hills that would be impacted by the project. c. As described in Section 3.4, Cultural Resources, the project site does include historic buildings and structures, some of which would be demolished, and others which would be reused as feasible. In addition, public access to the site would be restricted due to Department of Homeland	Potentially Consistent. The final consistency determination will be made by BCDC.

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d. d. Regulations, tax arrangements, or other devices should be drawn in a manner that encourages industries and port uses to meet the foregoing objectives.	Security regulations for the security of active marine terminals. Public access to the shoreline would continue to be provided to the north and south of the project site. In addition, VMT would install a new self-propelled personal watercraft launch just north of the access ramp to K Dock at the south end of the City of Vallejo Municipal Marina. This public access improvement would be completed by VMT in lieu of providing direct public access to the waterfront within the project site. d. Not applicable.	
Ports		
Policy 1. Port planning and development should be governed by the policies of the Seaport Plan and other applicable policies of the Bay Plan. The Seaport Plan provides for: a. Expansion and/or redevelopment of port facilities at Benicia, Oakland, Redwood City, Richmond, and San Francisco, and development of new port facilities at Selby; b. Further deepening of ship channels needed to accommodate expected growth in ship size and improved terminal productivity; c. The maintenance of up-to-date cargo forecasts and existing cargo handling capability estimates to guide the permitting of port terminals; and d. Development of port facilities with the least potential adverse environmental impacts while still providing for reasonable terminal development.	**VMT:** The VMT project component would redevelop the existing marine terminal facilities on the former General Mills site in order to provide additional capacity for importing and exporting cargo and other materials. The VMT project component would minimize adverse environmental impacts by reusing an existing site and performing minimal dredging and filling needed to achieve necessary design parameters for marine logistics. BCDC has determined that the use of the site for cargo would be consistent with the Bay Plan, provided that the use is interim in nature and does not preclude future use of the site for water-related industry. Interim uses are allowed for a limited period typically ranging from 5 years to 10 years, depending on the proposed use and conditions of the site. In some cases, the interim use is renewable by permit amendment.	Potentially Consistent. The final consistency determination will be made by BCDC.

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	Orcem: The Orcem project component does not propose to expand or redevelop port facilities; it would utilize the VMT Terminal by providing an enclosed conveyor to transport imported raw materials from the terminal to the Orcem Site.	
Policy 2. Some filling and dredging will be required to provide for necessary port expansion, but any permitted fill or dredging should be in accord with the Seaport Plan.	**VMT:** As described above, the VMT project component would require some filling and dredging in order to achieve necessary design parameters for marine logistics. The proposed filling and dredging would be in accordance with the Seaport Plan. **Orcem:** The Orcem project component would not involve any filling or dredging of Bay-Delta waters.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 3. Port priority use areas should be protected for marine terminals and directly-related ancillary activities such as container freight stations, transit sheds and other temporary storage, ship repairing, support transportation uses including trucking and railroad yards, freight forwarders, government offices related to the port activity, chandlers, and marine services. Other uses, especially public access and public and commercial recreational development, should also be permissible uses provided they do not significantly impair the efficient utilization of the port area.	**VMT and Orcem:** The proposed project is not located in a Port priority use area; however, it would re-establish marine-related industrial uses on the former General Mills site. Due to the nature of the planned operations on the site, including shipping, the site would be a Department of Homeland Security-controlled site, and no public access would be permitted. In addition, VMT would install a new self-propelled personal watercraft launch just north of the access ramp to K Dock at the south end of the City of Vallejo Municipal Marina. This public access improvement would be completed by VMT in lieu of providing direct public access to the waterfront within the project site.	Potentially Consistent. The final consistency determination will be made by BCDC.
Public Access		
Policy 1. A proposed fill project should increase public access to the Bay to the maximum extent feasible, in accordance with the policies for Public Access to the Bay.	**VMT:** As described above, a small area of fill would be required for the VMT project component in order to achieve necessary design parameters for marine logistics. Due to the nature of the planned operations on the site, including shipping, the site would be a	Potentially Inconsistent

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	Department of Homeland Security-controlled site, and no public access would be permitted. The project site has been historically used for similar industrial uses and has been closed to the public. Implementation of the proposed project would therefore not change existing public access to the site. Public access to the waterfront in this area would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south. In addition, VMT would install a new self-propelled personal watercraft launch just north of the access ramp to K Dock at the south end of the City of Vallejo Municipal Marina. This public access improvement would be completed by VMT in lieu of providing direct public access to the waterfront within the project site. BCDC will determine if the proposed public access improvements are sufficient. **Orcem:** The Orcem project component would not involve any Bay–Delta waters fill.	
Policy 2. In addition to the public access to the Bay provided by waterfront parks, beaches, marinas, and fishing piers, maximum feasible access to and along the waterfront and on any permitted fills should be provided in and through every new development in the Bay or on the shoreline, whether it be for housing, industry, port, airport, public facility, wildlife area, or other use, except in cases where public access would be clearly inconsistent with the project because of public safety considerations or significant use conflicts, including unavoidable, significant adverse effects on Bay natural resources. In these cases, in lieu access at another location preferably near the project should be provided.	**VMT and Orcem:** As described above, the project site would be a Department of Homeland Security-controlled site, and no public access would be permitted. Public access to the waterfront in this area would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south. In addition, in-lieu access would be provided as described in response to Public Access Goal 1 above. BCDC will determine if the proposed public access improvements are sufficient.	Potentially Inconsistent

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Policy 9. Access to and along the waterfront should be provided by walkways, trails, or other appropriate means and connect to the nearest public thoroughfare where convenient parking or public transportation may be available. Diverse and interesting public access experiences should be provided which would encourage users to remain in the designated access areas to avoid or minimize potential adverse effects on wildlife and their habitat.	**VMT and Orcem:** As described above, the project site would be a Department of Homeland Security-controlled site, and no public access would be permitted. Public access to the waterfront in this area would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south. In addition, in-lieu access would be provided, as described in response to Public Access Goal 1 above. BCDC will determine if the proposed public access improvements are sufficient.	Potentially Inconsistent
Appearance, Design and Scenic Views		
Policy 1. To enhance the visual quality of development around the Bay and to take maximum advantage of the attractive setting it provides, the shores of the Bay should be developed in accordance with the Public Access Design Guidelines.	**VMT and Orcem:** The Public Access Design Guidelines have been considered in the design of the proposed project; however, as described previously, the project site would be a Department of Homeland Security-controlled site, and no public access would be permitted. Public access to the waterfront in this area would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south.	Consistent
Policy 2. All bayfront development should be designed to enhance the pleasure of the user or viewer of the Bay. Maximum efforts should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas, from the Bay itself, and from the opposite shore. To this end, planning of waterfront development should include participation by professionals who are knowledgeable of the Commission's concerns, such as landscape architects, urban designers, or architects, working in conjunction with engineers and professionals in other fields.	**VMT and Orcem:** The proposed organization of land uses and grouping of structures would result in a well-composed urban design. The project designs take into consideration the existing characteristics of the site and surrounding area, as well as the functional requirements of the project components.	Potentially Consistent. The final consistency determination will be made by BCDC.

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Policy 3. In some areas, a small amount of fill may be allowed if the fill is necessary—and is the minimum absolutely required—to develop the project in accordance with the Commission's design recommendations.	**VMT:** As described above, a small area of fill would be required forthe VMT project component in order to achieve necessary design parameters for marine logistics. **Orcem:** The Orcem project component would not involve any Bay-Delta waters fill.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 4. Structures and facilities that do not take advantage of or visually complement the Bay should be located and designed so as not to impact visually on the Bay and shoreline. In particular, parking areas should be located away from the shoreline. However, some small parking areas for fishing access and Bay viewing may be allowed in exposed locations.	**VMT and Orcem:** The proposed project would reuse existing buildings on the site to the maximum extent practicable and would maintain the site as an industrial facility as it has been used historically. As described in Section 3.1, Aesthetics, the proposed structures and facilities would replace existing buildings of similar scale and style and replace some badly deteriorating structures with modern facilities. The proposed structures and facilities would be located generally in the same location as the existing buildings on the site and would not substantially alter the views of the Bay. Proposed parking would be located along the eastern hillside, away from the shoreline.	Consistent
Policy 5. To enhance the maritime atmosphere of the Bay Area, ports should be designed, whenever feasible, to permit public access and viewing of port activities by means of (a) - view points (e.g., piers, platforms, or towers), restaurants, etc., that would not interfere with port operations, and (b) - openings between buildings and other site designs that permit views from nearby roads.	**VMT and Orcem:** As described above, the project site would be a Department of Homeland Security-controlled site, and no public access would be permitted. Public access to the waterfront in this area would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south. In addition, in-lieu access would be provided, as described in response to Public Access Goal 1 above.	Potentially Consistent. The final consistency determination will be made by BCDC.
Policy 14. Views of the Bay from vista points and from roads should be maintained by appropriate arrangements and heights of all developments and landscaping between the view areas and the water. In this regard,	**VMT and Orcem:** As described in Section 3.1, Aesthetics, the proposed project would result in minor changes to views from public viewpoints	Consistent

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particular attention should be given to all waterfront locations, areas below vista points, and areas along roads that provide good views of the Bay for travelers, particularly areas below roads coming over ridges and providing a "first view" of the Bay (shown in Bay Plan Map No. 8, Natural Resources of the Bay).	surrounding the site. The proposed construction would primarily replace existing buildings of similar scale and style and would include landscaping to help screen the facilities from surrounding areas. The proposed development would not significantly detract from any scenic vistas.	
Fills in Accord with the Bay Plan		
Policy 1. Fills in accord with the Bay Plan. A proposed project should be approved if the filling is the minimum necessary to achieve its purpose, and if it meets one of the following three conditions: a. The filling is in accord with the Bay Plan policies as to the Bay-related purposes for which filling may be needed (i.e., ports, water-related industry, and water-related recreation) and is shown on the Bay Plan maps as likely to be needed; or b. The filling is in accord with Bay Plan policies as to purposes for which some fill may be needed if there is no other alternative (i.e., airports, roads, and utility routes); or c. The filling is in accord with the Bay Plan policies as to minor fills for improving shoreline appearance or public access.	**VMT:** As described above, a small area of fill would be required in order to achieve necessary design parameters for marine logistics. The proposed fill would allow for the reuse of an existing wharf area for modern cargo loading and unloading, which would provide a substantial public benefit by increasing the capacity for cargo shipping in the City of Vallejo. BCDC has determined that the use of the site for cargo would be consistent with the Bay Plan, provided that the use is interim in nature and does not preclude future use of the site for water-related industry. Interim uses are allowed for a limited period typically ranging from 5 years to 10 years, depending on the proposed use and conditions of the site. In some cases, the interim use is renewable by permit amendment.[1] **Orcem:** The Orcem project component would not involve any Bay-Delta waters fill.	Potentially Consistent (final determination made with BCDC permit application)
Vallejo General Plan		
Waterfront Development Goal: To have a waterfront devoted exclusively to water oriented uses, including industrial, residential, commercial and open space uses, which permit public access.	**VMT and Orcem:** The proposed project includes water-oriented industrial uses that are reliant on water for transportation of materials. Due to the nature of the planned operations on the site, including shipping, the site would be a Department	Consistent

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	of Homeland Security-controlled site, and no public access would be permitted. The project site has been historically used for similar industrial uses and has been closed to the public. Implementation of the proposed project would therefore not change existing public access to the site. Public access to the waterfront in this area would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south. In addition, VMT would install a new self-propelled personal watercraft launch just north of the access ramp to K Dock at the south end of the City of Vallejo Municipal Marina. This public access improvement would be completed by VMT in lieu of providing direct public access to the waterfront within the project site.	

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Policy 1: BCDC's Public Access Design Guidelines should be used in reviewing all development proposals. In areas hazardous to public safety or incompatible with public use, in-lieu access at another nearby location may be provided.	**VMT and Orcem:** The BCDC Public Access Design Guidelines have been considered in the design of the proposed project. However, as described previously, due to the nature of the planned operations on the site, no public access would be permitted. Public access to Mare Island Strait would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south, In-lieu access would be provided via the installation of a new self-propelled personal watercraft launch, as described above. However, based on review of the proposed access and coordination with BCDC staff that this proposal does not meet the intent of the policy because the scope of the access is so limited and will only serve a very limited population within the City jurisdiction.	Inconsistent
Policy 3: The following public access to and along public waterways, streams and rivers is required where feasible: a. Access to the water every 1,500 feet; b. Accessway to be a minimum of 50 feet wide; c. Access along the: water to be a minimum of-200 feet in width; a. Planned Developments and commercial and industrial areas may vary provided they are within the intent and purpose of this provision.	**VMT and Orcem:** The proposed project is located on Mare Island Strait, which is a public waterway; however, as described above, no public access would be permitted. Public access to Mare Island Strait would continue to be provided adjacent to the project site along Derr Street to the north and Sandy Beach Road to the south. The project site has been historically used for similar industrial uses and has been closed to the public. Implementation of the proposed project would therefore not change existing public access to the site. In addition, in-lieu access would be provided via the installation of a new self-propelled personal watercraft launch, as described above.	Consistent

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Industrial Development Goal 3: To insure compatibility between industrial land uses and uses of a lesser intensity.	**VMT and Orcem:** The proposed project is located in an area that has been historically used for industrial uses and is assigned an industrial land use designation. The project site is bound by steep hillsides, Mare Island Straits, and railroad tracks, which all serve as natural buffers from the surrounding uses of lesser intensity.	Consistent
Policy 1: Where possible, natural buffers, e.g., railroad tracks, major street, or abrupt topographic changes should be used to delineate industrial areas.	**VMT and Orcem:** The proposed project is located in an area that has been historically used for industrial uses and is assigned an industrial land use designation. The project site is bound by steep hillsides, Mare Island Straits, and railroad tracks, which all serve as natural buffers from the surrounding areas.	Consistent
Industrial Development Goal 4: To maximize the potential of industrially zoned lands for the fostering of new and innovative industrial development.	**VMT and Orcem:** The proposed project would redevelop the industrially zoned project site with a viable marine terminal and manufacturing facility for ground granulated blast furnace slag (GGBFS) and other cement products. Use of the project site would be maximized by locating both the VMT and Orcem components of the project on one site.	Consistent
Policy 1: Use the Planned Development approach in those areas where industrial uses will be compatible with accessory residential and/or commercial uses.	**VMT and Orcem:** The proposed project would involve shipping and industrial operations that would not be compatible with accessory residential uses; however, VMT proposes to allow for future commercial office use of remaining existing buildings on the site, including the Administration Building. Any future uses on the site would be required to be compatible with the VMT and Orcem uses.	Consistent

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Circulation and Transportation, Compatibility with Adjoining Land Uses Goal: To have a street and highway system that services all land uses with a minimum adverse impact.	**VMT and Orcem:** As described in Section 3.12, Transportation and Traffic, the project site is currently accessible via the existing street and highway network surrounding the site. The proposed project would utilize this system and would implement mitigation measures, specified in Section 4.12, to minimize adverse impacts to the street and highway system.	Consistent
Policy 3: All truck traffic and regional bus service should be restricted to peripheral major streets and north-south, east-west arterial and collector streets having the least number of residences and schools. Only small trucks servicing the neighborhood centers should be allowed on other streets. Where possible, unloading facilities should be provided off alleys rather than streets.	**VMT and Orcem:** As described in Section 3.12, Transportation and Traffic, it is expected that trucks accessing the site would use primarily the Curtola Parkway–Lemon Street route for trips to/from I-780 and I-80 East, and the Sonoma Boulevard route for trips to/from I-80 West. Loading and unloading of the trucks would occur on the project site.	Consistent
Public Facilities and Other Services, Other Services Goal: To provide an efficient and financially sound system of urban services to protect the health, safety and general welfare of Vallejo area residents.	**VMT and Orcem:** As described in Section 3.11, Public Services and Recreation, the proposed project would be served by the existing urban services provided by the City of Vallejo.	Consistent
Air Quality Goal 1:To improve Vallejo's air quality.	**VMT and Orcem:** As described in Section 3.2, Air Quality, the proposed project would result in significant air quality impacts, some of which would remain significant and unavoidable after mitigation. However, feasible mitigation measures would be implemented to reduce air quality impacts to the maximum extent practicable.	Consistent
Policy 2: Balance jobs and housing in future development to provide Vallejo residents the opportunity to work within Vallejo, and reduce long distance commuting both to and from Vallejo. Jobs and housing should be balanced both in numbers and in salary range/housing cost.	**VMT and Orcem:** As described in Section 5.4, Growth Inducement, the proposed project is expected to generate temporary construction job, as well as full time jobs during operation. These jobs could potentially be filled by local Vallejo residents who currently commute to manufacturing and	Consistent

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	transportation and warehousing jobs outside of Vallejo. Although the project does not propose any new housing, the increase in local jobs would help reduce the number of residents commuting outside the City for similar jobs.	
Air Quality Goal 2: To reduce the air quality impact associated with future development in Vallejo.	**VMT and Orcem:** As described in Section 3.2, Air Quality, the proposed project would result in significant air quality impacts, some of which would remain significant and unavoidable after mitigation. However, feasible mitigation measures would be implemented to reduce air quality impacts to the maximum extent practicable.	Consistent
Policy 3: Require air quality mitigation for new development not amenable to TSM methods. Retail commercial and residential development, in particular, do not lend themselves to trip reduction through TSM. As part of the environmental review process these types of uses should be required to provide air quality mitigation by providing funding for off-site improvements to improve air quality. Examples of such improvements are pedestrian/bicycle amenities, transit support, transit amenities such as bus shelters, or additional park-and-ride lots.	**VMT and Orcem:** Once operational, the VMT component of the project would employee up to 40 individuals, and the Orcem component of the project would employ up to 40 individuals. The City's Transportation Systems Management (TSM) Ordinance (Municipal Code Chapter 8.70) requires TSM measures to be implemented for "Major Employers" (employers who employ 100 or more employees). Since VMT and Orcem would not employ 100 or more employees, they would be considered "Minor Employers." The VMT and Orcem project components would be required to comply with the requirements for minor employers as specified in Section 8.70.050 of the City's Municipal Code.	Consistent
Policy 4: Use project siting to reduce air pollution exposure of sensitive receptors. Locate air pollution sources away from residential areas and other sensitive receptors. Include buffer zones within residential and sensitive receptor site plans to separate these uses from freeways, arterials, point sources and potential sources of odors.	**VMT and Orcem:** The proposed project is a site dependent use and is located on the site of a previous marine terminal. Siting for the proposed project is constrained by physical site suitability characteristics and access to	Consistent

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	transportation. Site layout would be planned to minimize air pollution exposure to the maximum extent feasible.	
Fish and Wildlife Resources Goal: To protect valuable fish and wildlife habitats.	**VMT:** As described in Section 3.3, Biological Resources, the proposed wharf would affect marine benthic and intertidal hard-substrate habitat, however all impacts would be either less than significant or would be mitigated to a less-than-significant level. **Orcem:** The Orcem Plant would redevelop an existing industrial facility and would comply with all mitigation measures identified in Section 3.3, Biological resources to reduce impacts to wildlife habitat to below a level of significance.	Consistent
Policy 5: Recognize areas valuable for marine life productions, particularly the Napa Marshes and Carquinez Strait, and work with the California Department of Fish and Game and Bay Conservation and Development Commission in insuring the protection of these areas from incompatible uses.	**VMT:** The VMT project component would permanently impact approximately 1.04 acres of subtidal soft substrate habitat considered to be of low quality for fish foraging, and create approximately 600 linear feet of new intertidal hard substrate supportive of sessile marine fauna. Impacts would be less than significant. **Orcem:** The Orcem project component would not result in development in or use of marine or estuarine habitat.	Consistent
Noise Goal: To provide for a more pleasing acoustic environment for the city by controlling noise levels in a manner that is acceptable to the residents, reasonable for commercial and industrial land uses, and practical to enforce.	**VMT and Orcem:** As described in Section 3.10, Noise, the proposed project would result in significant noise impacts after mitigation since the City cannot guarantee that the California Northern Railroad will implement the measures needed to reduce noise associated with the proposed rail operations. The noise levels generated by proposed rail operations would be reasonable for	Consistent

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	industrial land uses and be reduced to the maximum extent practicable by the applicants and the applicants would be committed to working with the railroad to reduce noise levels as feasible.	
Policy 2: Roadways should be kept in good repair and new surface material should be evaluated in terms of noise generation.	**VMT and Orcem:** As described in Section 3.12, Transportation and Traffic, implementation of MM-3.12-1 would ensure that any damage to streets caused by construction equipment would be repaired by the project applicant. In addition, MM-3.12-4a and MM-3.12-5 would require improvements to Lemon Street to ensure the roadway is maintained during project operations. As described in Section 3.10, Noise, implementation of MM-3.10-3a would ensure that roadway noise from construction vehicles would remain less than significant.	Consistent
Floodplain Hazards Goal: To protect life, property, and public well being from seismic, floodplain, and other environmental hazards and to reduce or avoid adverse economic, social, and physical impacts caused by existing environmental conditions.	**VMT and Orcem:** As described in Section 3.5, Geology and Soils, and Section 3.8, Hydrology and Water Quality, implementation of required mitigation measures would ensure that the proposed project would not result in any significant impacts related to seismic, floodplain, or other environmental hazards.	Consistent
Policy 3: Evaluate all new developments to determine how peak runoff can be delayed using such measures as detention or retention basins, permanent greenbelt areas, temporary underground storage, permeable paving and roof top ponding.	**VMT and Orcem:** As described in Section 3.8, Hydrology and Water Quality, both VMT and Orcem would be subject to their respective Stormwater Control Plans, which have been designed to reduce stormwater runoff and minimize Bay water pollution.	Consistent

Note:

[1] See San Francisco BCDC letter dated April 29, 2016 (associated with this document in the Response to Comments section