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SENT VIA ELECTRONIC MAIL

February 23, 2024

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Governor's Office of Planning & Research

Feb 23 2024

STATE CLEARINGHOUSE

RE: CARNEGIE STATE VEHICULAR RECREATION AREA (SVRA) GENERAL PLAN UPDATE, PRELIMINARY GENERAL PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) DATED JANUARY 16, 2024 STATE CLEARINGHOUSE NUMBER [2022030810](#)

Dear Katie Metraux:

As a Responsible Agency, the Department of Toxic Substances Control (DTSC) received the DEIR for the Carnegie SVRA General Plan Update (GPU). The purpose of the GPU is to provide a comprehensive framework for future Park development and use; provide management objectives for the Park; identify formal boundaries and make recommendations for the classification of all of the Park's acreage. The Carnegie SVRA GPU establishes long-range visions and goals and provides direction on future types of improvements, services, and programs. The SVRA GPU also describes multiple projects which will improve operations and visitor experience of Carnegie SVRA. The proposed projects include a new group campsite, campfire center, recreational vehicle dump station, motorbike trails, pedestrian trails, an additional visitor

recreation area, expansion of the ranger station, improvements of the maintenance area and headquarters, a new greenhouse, and a water treatment facility upgrade.

In accordance with Section 15123 of the California Environmental Quality Act (CEQA) guidelines, an Environmental Impact Report (EIR) is to provide a brief summary of the proposed action and its consequences. The Carnegie SVRA DEIR includes a summary and potential effects of implementing projects proposed by the Carnegie SVRA GPU.

DTSC conducted its review of the GPU and DEIR with a focus on potential environmental impacts on the GPU proposed projects by the Lawrence Livermore National Laboratory (LLNL) Site 300 Pit 6 Landfill. The Pit 6 landfill is a 2.6-acre area at the southern boundary of LLNL Site 300. From 1964 to 1973, this landfill was used to bury waste in nine unlined debris trenches and animal pits. The buried waste includes shop and laboratory equipment and biomedical waste. In 1997, the Pit 6 landfill was covered with an engineering cap under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) requirements. Based on a completed investigation, the compounds of concern (COC) in Pit 6 groundwater include volatile organic compounds (primarily chloroform and trichloroethene), perchlorate, tritium, and nitrate. The selected remedy for the Pit 6 Landfill includes engineering capping and Monitoring Natural Attenuation (MNA). The progress and effectiveness of the implemented remedy is being monitored by the LLNL regularly.

In accordance with the GPU, the proposed upgrade of the existing water treatment facility includes increasing water treatment capacity and providing a backup electricity generating unit. In addition, the proposed upgrade will replace the existing system with a pressurized system, a new water treatment building, new water monitoring equipment and safety features. The treatment facility is in a 4-acre operations area north of Corral Hollow Road. Within the 4-acre site, there are wells which supply both the potable and non-potable water needs of the Carnegie SVRA. Two of the water supply wells are approximately 1,000 feet east of the capped LLNL Site 300 Pit 6 Landfill.

In accordance with the DEIR (Section 3.10), the proposed water treatment facility upgrade would include the potential for additional groundwater withdrawal to supply

potable water for SVRA needs. However, the exact amount of potential groundwater increase is unknown at the time the DEIR was produced. After review, DTSC recommends the following:

According to the sampling results presented in the most recent [groundwater monitoring report](#) for LLNL Site 300, the COC's detected in groundwater wells around Pit 6 do not present any adverse impact to the water quality of the SVRA water supply wells. However, monitored data shows hydraulic connections between the Pit 6 groundwater wells (W-PIT-1819 and K6-34) and the two water supply wells for the SVRA. Therefore, potential impacts to the water supply wells may be a concern if pumping rates are increased during both construction and operations of the upgrade projects proposed by the GPU. The text of Section 3.10 of the DEIR should be revised to include a discussion of whether the proposed upgrades of the water treatment system are projected to result in water quality impacts and appropriate mitigation measures should be implemented to address these impacts.

DTSC appreciates the opportunity to comment on the Carnegie SVRA General Plan Update and Draft Environmental Impact Report. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



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cc: (via email)

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