



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

June 29, 2015

California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division
c/o Petra Unger, AECOM, attn. Carnegie SVRA General Plan
2020 L Street, Suite 400
Sacramento, CA 95811

Subject: Carnegie State Vehicle Recreation Area (SVRA) General Plan DEIR

Dear Ms. Unger:

Bay Area Air Quality Management District (Air District) staff has reviewed the Off-Highway Motor Vehicle Recreation Division's Draft Environmental Impact Report (DEIR) prepared for the Carnegie State Vehicle Recreation Area General Plan (Project). Carnegie SVRA comprises 1,575 acres currently open to the public and an adjacent 3,100-acre expansion area that is not yet open to the public. The 1,575 acres currently open are in unincorporated San Joaquin County; the 3,100 acres of expansion area are in unincorporated Alameda County. Including both sites, the Project is 4,675 acres.

The Project is a long-range plan that includes improvements to park facilities related to access, education, recreation opportunities, and operations. These improvements include additional recreation opportunities and parking, and a training site that could include office space, camping, additional maintenance space, a ranger station, a new interpretive facility, communication or tech support facilities, and a helicopter landing site.

The project area is surrounded by open space and rural residential areas to the east, west and south, and Lawrence Livermore National Laboratory Experimental Test Site (Site 300) to the north. The Project is 15 miles east of Livermore and 12 miles southwest of Tracy.

Air District staff has the following comments on the DEIR:

The DEIR concludes that the Project contributes to a cumulatively considerable increase in criteria pollutants, specifically of coarse particulate matter ("PM10") and fine particulate matter ("PM2.5") emissions during operations (Impact 3-2.3). The DEIR concludes that there are no mitigation measures available to reduce these emissions below the significance level.

Air District staff recommends that the Off-Highway Motor Vehicle Recreation Division consider requiring the following mitigation measures to address this significant impact:

- Close the entire Park to off-road use on all summer and winter Spare the Air days in either County.

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- Prohibit the use of off-road equipment 2003 model year and newer that is certified non-compliant with California Off-Highway Vehicle emission standards ("Red Sticker" category) all year.
- Prohibit camp fires on all summer and winter Spare the Air days in either County.
- Prohibit the use of diesel generators to heat and cool recreational vehicle interiors on all summer and winter Spare the Air days in either County.
- Replace or retrofit any diesel maintenance equipment that does not meet 2010 year emission standards for PM2.5.
- Limit maintenance equipment engine idling to two minutes.

Air District staff is available to assist the Off-Highway Motor Vehicle Recreation Division in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Tom Bates
BAAQMD Director Margaret Fujioka
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley
Dave Warner, Deputy APCO, San Joaquin Valley Air Pollution Control District