



## Department of Toxic Substances Control



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March 1, 2010

CCMA RMP/EIS Comments  
Attention: Planning Coordinator  
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### DRAFT RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT (RMP/EIS) FOR THE CLEAR CREEK MANAGEMENT AREA (CCMA), SOUTHERN SAN BENITO AND WESTERN FRESNO COUNTY, CALIFORNIA

To Whom It May Concern:

Thank you for providing the Department of Toxic Substances Control (DTSC) an opportunity to review and comment on the draft RMP/EIS which was public noticed by the Bureau of Land Management (BLM) in November 2009.

Based on our review, the RMP/EIS identifies seven alternatives for managing the CCMA and identifies Alternative E as BLM's preferred alternative. According the RMP/EIS, Alternative E contains a selection of land use decisions and management actions which includes, but is not limited to, 1) access on the Scenic Route along T153 and Spanish Lake Road in the Serpentine Area of Critical Environmental Concern (ACEC) for day use by full-size vehicles only; 2) access by Special Recreation Permits only limiting visitor use in the area; 3) manage the Tucker, Condon, and Cantua Zones with emphasis on enhancing hunting and other non-motorized recreational opportunities; 4) improve access and enhance facilities to support non-motorized recreation opportunities in the Cantua Zone; 5) mitigate recreational facilities inside the Serpentine ACEC for public health and safety; 6) continue outreach and education program to create public and visitor awareness of human health risks from exposure to airborne asbestos fibers in CCMA; 7) use best available technologies for dust abatement on roads and during project implementation; 8) reduce emissions from recreation facilities and on major routes with dust suppression and surface hardening techniques as needed; and 9) cooperate with adjacent private landowners on land management activities.

DTSC agrees that the alternatives have been thoroughly established and continues to recommend that any alternative that is selected be evaluated for potential human health risk due to asbestos exposure and to implement mitigation measures as appropriate. As a recreational user of a proposed new area may encroach on the Atlas Asbestos Mine Operable Unit of the Superfund Site, the site should be secured as necessary from potential trespass.

From review of the document, the grouping of the management actions and BLM's preferred alternative are well defined in section 2. From our review of the RMP/EIS, the following comments are provided:

1. Recommend all possible precautions be used to minimize potential exposure to asbestos.
2. Map 5 contains boundaries for serpentine and non-serpentine formation. Recommend the existing and proposed new recreational facilities identified in Alternative E outside the ACEC be verified with USGS maps as clearly outside the overlying serpentine formation. If found, recommend assessing the existing and proposed routes for the occurrence of asbestos and use of activity based monitoring and assessment of potential risk as deemed necessary. Appropriate mitigation measures should be considered for minimizing asbestos exposures to all proposed uses. Consider similar scenarios to those assessed by USEPA for the ACEC to determine potential risk to adults and children using OHVs in these areas. Develop an activity based scenario for any new uses as well (e.g equestrian).
3. Recommend the road proposed for the scenic route through the ACEC be resurfaced to reduce asbestos emissions.
4. Consider reducing speed limits of 15-25 miles per hour on the scenic route to no more than 10 unless resurfacing to mitigate asbestos emissions is completed.
5. For potential asbestos areas, consider establishment of public use vehicle washing and HEPA vacuuming stations at the entrance(s) with standard operating procedures so that vehicles can be cleaned upon leaving.
6. Consider not allowing livestock grazing on the ACEC BLM managed lands in order to minimize dust generation and release of asbestos.
7. To the extent feasible, recommend adding precautions to protect fire fighters using Best management Practices from asbestos exposure during wildland fires and controlled burns within the ACEC.

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Page 3

8. Recommend for Best Management Practices (Appendix V) a) trigger for initiating each measure, b) conditions in which the management practices will be used, and c) measuring techniques and criteria for measuring effectiveness.

If you have any questions, please contact me at (916) 255-3694.

Sincerely,



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