



Aaron lindy  
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03/03/2010 02:08 PM

To <cahormp@ca.blm.gov>  
cc  
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Subject Clear Creek Management Area Draft RMP/EIS

Hi, my name is Aaron Lindgren. i just read an artical on the Blue Ribbon Coalition web site about the clear creak area and how the public comment period wouldn't be extended. i truely feel that this is a mistake and that if the people in charge would listen to us in the Ohv community they'd learn alot about the area. When i was 11 years old my father brought me to clear creak several times in our old jeep and taught me how to drive it. i really feel that trips like those taught me alot about being responsible and i learned to care for the outdoors. My father is no longer around, but I have a 13 year old brother who i would love to be able to take out there and teach him some of the things my father taught me.

I had heard from a friend that the area was back open and went out there this past weekend with my brother only to be extreamly dissappointed that i had been misinformed. my little brother ,Kolby, was heartbroken that he wouldn't be able to spend the day learning how to drive and spending time in the surrounding mountians with no asphalt like at home.

from what i've read this area was mainly closed because of "health risks" but then read "The BLM admitted at the recent CA OHMVR Commission meeting in San Jose that to date they are aware of no cases of asbestos-related illnesses noted in the recreation community that has been using Clear Creek since the 1940s." i understand that to mean there really isn't a health risk. i also understand that monitering the area and having the resources to maintain the area can be costly but i would be willing to bet the people who want to use the area would be willing to help cover the costs, i know i would.

Please do what you can to help in the fight against permanet closure of the area, it would be a shame to make it against the law to enjoy the nature our great God has given us. there is no purpose for the land if we can't use it

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"Alex Wagner-Jauregg"  
<awagner@exponent.com>

03/03/2010 09:59 PM

To <cahormp@ca.blm.gov>

cc

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Subject CCMA RMP/EIS Comment



Please find enclosed a comment in PDF form. CCMA RMP Comments, OSHA Report, A Wagner-Jauregg.pdf



Alex Wagner-Jauregg  
<akwagner@mac.com>

03/01/2010 10:27 PM

To cahormp@ca.blm.gov

cc

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Subject CCMA RMP/EIS

Please find enclosed a comment.

Alex Wagner-Jauregg



CCMA RMP Comments, Need, A Wagner-Jauregg.pdf



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:59 PM

To <cahormp@ca.blm.gov>  
cc  
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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Missing Information**

**Referring to the Following Paragraph in the 2008 EPA Risk Assessment Report**

7.2.3 Effect of Smoking

One key point from the asbestos toxicity evaluations that form the basis for the IRIS slope factor is that **smoking status is important in evaluating the probability or risk of lung cancer.** Asbestos exposure and smoking appear to be synergistic for lung cancer. Smoking increases the risk of disease from asbestos exposure, because the risks associated with each stressor contribute to total risk. The US EPA's IRIS toxicity value was based on mortality statistics from 1977 population data, including smokers. **Since then, the number of smokers in the population has decreased.** Therefore, the risk calculations may overestimate risks for CCMA users based on current population smoking patterns but may underestimate the risk for the population of users that smoke.

**Discussion**

The BLM Draft EIS/RMP fails to mention that smoking has decreased and risk calculations may overestimate risks for CCMA users based on current population smoking patterns.

**Recommendation**

The BLM needs to include information that identifies that risk calculations may overestimate risks for CCMA users based on current population smoking patterns.

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To <cahormp@ca.blm.gov>  
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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: 2008 EPA Risk Document Errors**

**Referring to the Following Paragraph**

Assessment and provide more robust information to BLM on the asbestos exposures from **typical CCMA recreational activities** and the excess lifetime cancer risks associated with those exposures.

**Discussion**

The EPA report did not use typical recreational activities. The average rider does not ride at CCMA for 30 years.

**Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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Subject CCMA DRMP/DEIS Comments

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Attention: Planning Coordinator  
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Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: 2008 EPA Risk Document Errors**

**Referring to the Following Paragraph**

Data for the exposure assessment was collected using activity-based sampling, **simulating typical CCMA recreational activities** and collecting samples from the breathing zone of participants, and the samples were analyzed using transmission electron microscopy (TEM).

**Discussion**

The test methodology used did not simulate how a human breaths. The test procedure used by EPA simulated how a machine would breath, that is on a timed bases. Humans on the other hand instinctively hold their breath under heavy dust conditions. The EPA test therefore does not reflect reality and is flawed.

**Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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To <cahormp@ca.blm.gov>  
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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Erroneous Statement**

**Referring to the Following Paragraph**

The EPA study determined that visitor use on public lands in CCMA can increase the long-term risk of cancer from exposure to asbestos.

**Discussion**

The following is from the 2008 EPA report.

In summary, the asbestos exposures that EPA measured at CCMA are high and the resulting health risks are of concern.

**Recommendation**

Change the report to show "the EPA has a concern regarding the risks but there are uncertainties inherent in risk assessment".

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CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Erroneous Statement**

**Referring to the Following Paragraph**

The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides **significant new information** that must be incorporated into a land use plan to evaluate the public health risk associated with BLM land use authorizations..

**Discussion**

The EPA report indicates the information regarding health risk is uncertain. BLM should not consider the EPA report as "significant".

**Recommendation**

Replace the sentence as follows:

The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides **insignificant new information**.

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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Subject: CEQ Regulations**

**Referring to the Following Paragraph**

§1502.22 Incomplete or unavailable information.

When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, **the agency shall always make clear that such information is lacking.**

**Discussion**

BLM is using the 2008 EPA Asbestos Risk Assessment as evidence when the document is only an assessment. BLM fails to identify there is lacking information that shows scientifically there is an asbestos risk at CCMA.

**Recommendation**

Add to the DEIS a notice that asbestos risks evidence is lacking.

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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Not following NEPA guidelines**

**Referring to the Following NEPA Paragraph**

(b) Implement procedures to make the NEPA process more useful to decisionmakers and the public; to reduce paperwork and the accumulation of extraneous background data; and to emphasize real environmental issues and alternatives. Environmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses.

### **Discussion**

BLM has provided incorrect information to the EPA regarding OHV activity. The EPA Asbestos risks are based on 30 year usage and there is no evidence that any recreation by individuals is being done every year for 30 years straight.

### **Recommendation**

Remove all information concerning the EPA risk analysis. Ask the EPA to provide information on risk assessments based on recreational use.

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Subject CCMA RMP/EIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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Hollister Field Office  
20 Hamilton Court  
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**Subject: Not following NEPA guidelines**

**Referring to the Following Paragraph**

Alternative A represents the 'No Action' alternative and would reaffirm current management under the 1984 Hollister RMP (as amended). BLM would incorporate new health risk information into public outreach and education asbestos hazard information program to mitigate public health risk.

**Discussion**

The NEPA 1502.14 (d) requires BLM to provide a No Action alternative. BLM has failed to provide a No Action alternative but instead has added conditions to the No Action Alternative.

**Recommendation**

Provide a No Action Alternative without conditions as required by NEPA.

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Subject CCMA RMP/EIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
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20 Hamilton Court  
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**Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. **The result of the study concluded** that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found an increased long-term cancer risk from engaging in many of the typical recreational activities at the CCMA.

### **Discussion**

The EPA report (May 2008) clearly states that the risks are uncertain (marked in bold).

"Uncertainty related to the toxicity parameters of the risk characterization includes the application of the IRIS and OEHHA asbestos toxicity values, which were developed from epidemiological studies of occupational exposures, to infrequent and episodic recreational exposures. **This uncertainty could mean that the actual risks could be much lower than those estimated in the CCMA assessment**"

### **Recommendation**

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. **The result of the study concluded** that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found an increased long-term cancer risk from engaging in many of the typical recreational activities at the CCMA.

### **Discussion**

From the EPA report (May 2008)

Evaluation of chemical risk involves the determination of the extent of exposure to the chemical of concern and the toxicity or dose-response of the organism to the chemical. **All risk assessments have some level of uncertainty associated with them.** EPA strives to conduct risk assessments that are neither underestimated nor grossly overestimated. However, because our mission is to protect public health and the environment, **EPA tries to insure that the public is protected by not underestimating risk.** In our risk characterization, we work to identify areas of uncertainty and, if possible, determine their potential impact on our risk estimates. Risk managers use the risk assessment and an understanding of the associated areas of uncertainty to make informed decisions to manage the risk. This section will attempt to present the major uncertainties inherent in the assessment of exposure to asbestos at CCMA and the resulting estimate of risk.

### **Recommendation**

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

Andy Bajka

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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: CEQ Regulations**

**Referring to the Following Paragraph found in FOIA.**

04/01/2009 10:39am from Rick Cooper.

I believe the EPA risk calculations and sampling to be accurate.

### **Discussion**

The CEQ regulations mandate the following:

§1506.1 Limitations on actions during NEPA process.

(3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.

### **Recommendation**

The BLM DEIS must considered void as it has been prejudiced by Rick Cooper whom is the key personal that has initiated the DEIS. This prejudice is apparent throughout the document. Rick Cooper has already made up his mind as to the outcome of CCMA. The public needs BLM land managers that have an open mind to all possibilities and allow science and facts to determine their decision process.

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03/01/2010 01:52 PM

To <cahormp@ca.blm.gov>  
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Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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20 Hamilton Court  
Hollister, CA 95023

**Subject: Erroneous Statement**

**Referring to the Following Paragraph**

The overall vision for management of BLM-administered lands in CCMA, derived from public scoping, inter-agency dialogue, and BLM's interdisciplinary team, is "to improve natural, cultural, and open space values across the landscape for the **protection of human health** and the environment; and pursue recreation opportunities through partnerships and collaboration for the enjoyment and use of a growing and diverse populations of current and future generations."

**Discussion**

The EPA report fails to show there are any health risks by not providing an Epidemiology report which would back up their data.

**Recommendation**

Remove the reference to "protection of human health".

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Subject CCMA DRMP/DEIS Comments

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Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Staging Area Restoration**

**Referring to the Following Document**

BLM document June 2009 Staging Area Restoration

Executive Order 11644 (Use of Off-Road Vehicles on the Public Lands), February 9, 1972 (87 F.R. 2877), to establish policies and provide for procedures to control and direct the use of Off-Highway Vehicles on Federal lands so as to (1) protect the resources of those lands, (2) promote the safety of all users of those lands, and (3) minimize conflicts among the various uses of those lands.

**Discussion**

BLM is using the above in violation of CEQ order 1502.2 which directs the following: Agencies shall not commit resources prejudicing selection of alternatives before making a final decision.

**Recommendation**

Stop all construction at CCMA until a final ROD is made.

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Attention: Planning Coordinator  
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**Subject: Code of Federal Regulations**

**Referring to the Following Paragraph**

9239.2-5 Settlement and free passage over public lands not to be obstructed.

Section 3 of the Act of February 25, 1885 (23 Stat. 322; 43 U.S.C. 1063), provides that no person by force, threats, intimidation, or by any fencing or enclosing or any other unlawful means shall prevent or obstruct or shall combine or confederate with others to prevent or obstruct any person from peaceably entering upon or establishing a settlement or residence upon any tract of public land subject to settlement or entry under the public land laws of the United States or shall prevent or obstruct free passage or transit over or through the public lands.

**Discussion**

BLM has illegally closed access to CCMA which are our public lands.

**Recommendation**

Remove all restrictions that prevent access to CCMA.

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03/02/2010 10:29 PM

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Subject CCMA DRMP/DEIS Comments (Comment #28)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

### **Comment #28**

**Subject: OHV use and EPA testing**

### **Referring to the Following Document**

In the Activity Based Sampling Scripts shown in Appendix B of the EPA Report, the motorcycle script states: "The distance between riders varied depending on visibility, terrain, and safety considerations, with the ultimate objective to realistically simulate the behavior of recreational riders.

### **Discussion**

The EPA testing did not simulate recreational riders. If they had followed the same information provided by the BLM Hollister Field Office they would have know to avoid the lead riders dust. Here is the information provided by BLM.

### **Recommendation**

Remove EPA Risk Assessments from the DEIS.

Andy Bajka  
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Los Altos, CA 94024 [attachment.php?attachmentid=300017&d=1267595810](http://attachment.php?attachmentid=300017&d=1267595810)



[attachment.php?attachmentid=300018&d=1267595984](#)



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Subject CCMA DRMP/DEIS Comments (Comment #27)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
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**Comment #27**

**Subject: Alternative A represents the 'No Action' alternative required by NEPA**

**Recommendation:**

I would like to see BLM choose Alternative A.

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Subject CCMA DRMP/DEIS Comments (Comment #26)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
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### **Comment #26**

**Subject: Incomplete Data**

### **Referring to the Following Paragraph**

1992 PTI document submitted to BLM.

"Similarly, the URF derived from data on mesothelioma incidence in a population exposed to chrysotile asbestos in a mining setting is 0.031 (f/cc)-1 (McDonald et al. 1980; Berman 1992, pers. comm.), which is 7 times lower than the current URF for asbestos. Thus, use of the current URF may result in a 7 to 200-fold overestimate of risks for exposures to chrysotile asbestos at the CCMA."

### **Discussion**

BLM failed to mention the PTI study done in 1992. This report clearly indicates the EPA study which uses the IRIS toxicity values will have an overestimate of 7 times.

### **Recommendation**

BLM needs to include the PTI information in the EIS, or remove all references that are made to the EPA risk assessment.

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Subject CCMA DRMP/DEIS Comments (Comment #25)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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20 Hamilton Court  
Hollister, CA 95023

### **Comment #25**

#### **Subject: Missing Information**

#### **Referring to the Following Paragraph in the 2008 EPA Risk Assessment Report**

##### 7.2.3 Effect of Smoking

One key point from the asbestos toxicity evaluations that form the basis for the IRIS slope factor is that **smoking status is important in evaluating the probability or risk of lung cancer**. Asbestos exposure and smoking appear to be synergistic for lung cancer. Smoking increases the risk of disease from asbestos exposure, because the risks associated with each stressor contribute to total risk. The US EPA's IRIS toxicity value was based on mortality statistics from 1977 population data, including smokers. **Since then, the number of smokers in the population has decreased**. Therefore, the risk calculations may overestimate risks for CCMA users based on current population smoking patterns but may underestimate the risk for the population of users that smoke.

#### **Discussion**

The BLM Draft EIS/RMP fails to mention that smoking has decreased and risk calculations may overestimate risks for CCMA users based on current population smoking patterns.

#### **Recommendation**

The BLM needs to include information that identifies that risk calculations may overestimate risks for CCMA users based on current population smoking patterns.

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Subject CCMA DRMP/DEIS Comments (Comment #24)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
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### **Comment #24**

### **Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. **The result of the study concluded** that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found an increased long-term cancer risk from engaging in many of the typical recreational activities at the CCMA.

### **Discussion**

From the EPA report (May 2008)

#### **7.2.1 Episodic Exposures**

There is uncertainty in using dose-response data derived from occupational studies to predict risk for recreational exposure scenarios. Occupational studies typically consisted of examining exposure to relatively high concentrations of asbestos over relatively extended periods, namely 8 hour work days, 5 days per week, for weeks to years i.e. 5 years.<sup>8</sup> While the asbestos exposures at Clear Creek may be significantly elevated, the type of recreational activity that takes place at CCMA is likely to be less frequent than the occupational exposures that were used to derive the toxicity values of both IRIS and OEHHA. **Because there is no clear mode of action for asbestos induced disease and no threshold for health effects, using a direct time-weighted extrapolation from the longer, chronic occupational exposures to shorter-term, episodic exposures may underestimate or overestimate the risk. The risks could be much lower because** the exposures may be too infrequent or the total retained fiber burden too few to initiate the asbestos disease process. As previously stated, there are several dissimilarities between the exposures evaluated in this study and those used to develop EPA's IRIS risk factor. The occupational exposures were in work environments to commercial asbestos products which were

mined and processed for fibrous habit, not to naturally occurring asbestos that exists in various forms and weathering states and was disturbed by recreational activities. However, peer reviewed epidemiological studies from around the world, e.g. Turkey, Cyprus, Crete, Sicily, New Caledonia, and Wittenoom, Australia,<sup>9</sup> demonstrate that exposure to naturally occurring asbestos causes health effects and death. Because exact toxicity studies on these asbestos forms and activities are not available, the occupational studies are the best approximation.

### **Recommendation**

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

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Subject CCMA DRMP/DEIS Comments (Comment #23)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### Comment #23

### Subject: Erroneous Statement

### Referring to the Following Paragraph

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### Discussion

From the EPA report (May 2008)

Evaluation of chemical risk involves the determination of the extent of exposure to the chemical of concern and the toxicity or dose-response of the organism to the chemical. **All risk assessments have some level of uncertainty associated with them.** EPA strives to conduct risk assessments that are neither underestimated nor grossly overestimated. However, because our mission is to protect public health and the environment, **EPA tries to insure that the public is protected by not underestimating risk.** In our risk characterization, we work to identify areas of uncertainty and, if possible, determine their potential impact on our risk estimates. Risk managers use the risk assessment and an understanding of the associated areas of uncertainty to make informed decisions to manage the risk. This section will attempt to present the major uncertainties inherent in the assessment of exposure to asbestos at CCMA and the resulting estimate of risk.

### Recommendation

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

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Subject CCMA DRMP/DEIS Comments (Comment #22)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Comment #22**

**Subject: CEQ Regulations**

**Referring to the Following Paragraph found in FOIA.**

04/01/2009 10:39am from Rick Cooper.

I believe the EPA risk calculations and sampling to be accurate.

**Discussion**

The CEQ regulations mandate the following:

§1506.1 Limitations on actions during NEPA process.

(3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.

**Recommendation**

The BLM DEIS must considered void as it has been prejudiced by Rick Cooper whom is the key personal that has initiated the DEIS. This prejudice is apparent throughout the document. Rick Cooper has already made up his mind as to the outcome of CCMA. The public needs BLM land managers that have an open mind to all possibilities and allow science and facts to determine their decision process.

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To <cahormp@ca.blm.gov>

cc

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Subject CCMA DRMP/DEIS Comments (Comment #21)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

### **Comment #21**

**Subject: CEQ Regulations**

### **Referring to the Following Paragraph**

Email 03/31/2009 from [Johnson.Jere@epamail.epa.gov](mailto:Johnson.Jere@epamail.epa.gov) to Nick Vleisides and CC'ed to Rick Cooper.

For a variety of reasons, it is very difficult to do a valid epidemiological of the health outcomes from either occupational or recreational exposures at CCMA.

### **Discussion**

The EPA failed to disclose this very important information in their 2008 CCMA Asbestos Risk Assessment even though Jere Johnson knew about this information well in advance of the report being published. It's required by CEQ (1502.22 Incomplete or unavailable information) to disclose these types of information when it's critical to the assessment.

### **Recommendation**

The BLM EIS must indicate there is no epidemiological information available from the EPA because the EPA finds it too difficult to obtain a valid epidemiological report.

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Subject CCMA DRMP/DEIS Comments (Comment #20)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
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### **Comment #20**

**Subject: CEQ Regulations**

### **Referring to the Following Paragraph**

§1502.22 Incomplete or unavailable information.

When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, **the agency shall always make clear that such information is lacking.**

### **Discussion**

BLM is using the 2008 EPA Asbestos Risk Assessment as evidence when the document is only an assessment. BLM fails to identify there is lacking information that shows scientifically there is an asbestos risk at CCMA.

### **Recommendation**

Add to the DEIS a notice that asbestos risks evidence is lacking.

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Subject CCMA DRMP/DEIS Comments (Comment #19)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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Hollister Field Office  
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### **Comment #19**

**Subject: OHV use and EPA testing**

### **Referring to the Following Document**

#### 3.1.4.2 CCMA Visitor Use

Visitor use now (and then) continues to be most prevalent during the winter months (November – April), because winter rainfall keeps the dust levels lower and temperatures cooler, as opposed to the extreme heat and dust present during the dry summer months.

### **Discussion**

The EPA testing does not factor in the typical OHV use at CCMA. Why, because they don't have accurate information regarding how many and when visitors recreate at CCMA.

### **Recommendation**

Remove EPA Risk Assessments from the DEIS.

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Subject CCMA DRMP/DEIS Comments (Comment #18)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Comment #18**

**Subject: Staging Area Restoration**

**Referring to the Following Document**

BLM document June 2009 Staging Area Restoration

Executive Order 11644 (Use of Off-Road Vehicles on the Public Lands), February 9, 1972 (87 F.R. 2877), to establish policies and provide for procedures to control and direct the use of Off-Highway Vehicles on Federal lands so as to (1) protect the resources of those lands, (2) promote the safety of all users of those lands, and (3) minimize conflicts among the various uses of those lands.

**Discussion**

BLM is using the above in violation of CEQ order 1502.2 which directs the following: Agencies shall not commit resources prejudicing selection of alternatives before making a final decision.

**Recommendation**

Stop all construction at CCMA until a final ROD is made.

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Subject CCMA DRMP/DEIS Comments (Comment #17)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Comment #17**

**Subject: Code of Federal Regulations**

**Referring to the Following Paragraph**

9239.2-5 Settlement and free passage over public lands not to be obstructed.

Section 3 of the Act of February 25, 1885 (23 Stat. 322; 43 U.S.C. 1063), provides that no person by force, threats, intimidation, or by any fencing or enclosing or any other unlawful means shall prevent or obstruct or shall combine or confederate with others to prevent or obstruct any person from peaceably entering upon or establishing a settlement or residence upon any tract of public land subject to settlement or entry under the public land laws of the United States or shall prevent or obstruct free passage or transit over or through the public lands.

**Discussion**

BLM has illegally closed access to CCMA which are our public lands.

**Recommendation**

Remove all restrictions that prevent access to CCMA.

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Subject CCMA DRMP/DEIS Comments (Comment #16)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #16**

**Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

Changes in social and economic conditions in San Benito County, the San Joaquin Valley, and the entire State of California have led to **increased demand for use of public lands for recreation and energy production**; as well as an increased awareness and social value placed on the cultural and natural resources in the Planning Area.

### **Discussion**

On page 135 of the DEIS, visitor use shows a decline. BLM does not provide data to show an increased demand for recreation in the above counties.

### **Recommendation**

Remove erroneous statement.

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Subject CCMA DRMP/DEIS Comments (Comment #15)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #15**

**Subject: Data Quality and Analytic Soundness**

### **Referring to the Following Paragraph**

BLM 2005 Land Use Planning Handbook

BLM recognizes that influential information should be subject to a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties, to an **acceptable degree of precision**.

### **Discussion**

BLM has failed to follow the Land Use Planning Handbook in that it mandates important data like asbestos risks to have a acceptable degree of precision.

### **Recommendation**

Remove all references from the BLM DEIS which references the EPA asbestos risks.

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Subject CCMA DRMP/DEIS Comments (Comment #14)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #14**

**Subject: 2008 EPA Risk Document**

### **Referring to the Following Paragraph**

2008 EPA Risk Document

Environmental Health Hazard Assessment (OEHHA) cancer toxicity values for asbestos. Calculations were prepared for 30-year adult exposures, as recommended by the **Superfund risk assessment guidance**.

### **Discussion**

EPA used as guidance procedures from a Superfund site. This has nothing to do with recreational use at CCMA. BLM used the EPA document incorrectly by claiming the EPA document relates to asbestos risks relating to recreational use, which it is not.

### **Recommendation**

Remove all references from the BLM DEIS which references the EPA Asbestos risk analysis.

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Subject CCMA DRMP/DEIS Comments (Comment #13)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #13**

**Subject: 2008 EPA Risk Document Errors**

### **Referring to the Following Paragraph**

2008 EPA Risk Document

Using the IRIS toxicity value, as shown in Figure ES-1, EPA's risk estimations found that making **five or more visits to CCMA per year over a 30-year period** to participate in recreational Scenarios 1 (Weekend Rider), 2 (Day Use Rider), 4 (Weekend Hunter), or 5 (Combined Rider/Workday) could put recreational users at an excess lifetime cancer risk above EPA's acceptable risk range of  $1 \times 10^{-4}$  (1 in 10,000) to  $1 \times 10^{-6}$  (1 in 1,000,000).

### **Discussion**

From the 1991 EPA Atlas Mine Superfund ROD

**FOR EXPOSURE TO AIR DURING OFF-ROAD VEHICLE ACTIVITY, IT WAS ASSUMED THAT A 20-YEAR OLD MALE DRIVES FOR THREE HOURS PER DAY, 16 DAYS PER YEAR FOR FIVE YEARS (THE AVERAGE CASE).**

The EPA used a more realistic average in the 1991 ROD and used an incorrect average in the 2008 Risk Document. In either case real numbers need to be used based on counting the visitors. This has never been done so the EPA is guessing. The EPA is required to use accurate data.

### **Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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Subject CCMA DRMP/DEIS Comments (Comment #12)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #12**

**Subject: 2008 EPA Risk Document Errors**

### **Referring to the Following Paragraph**

The report provides excess lifetime cancer risk estimates for the seven scenarios. The first five scenarios reflect recreational exposures.

### **Discussion**

The report assumes incorrectly that recreational users will visit CCMA for 30 years. No verified data was used to come to the conclusion that the average rider rides at CCMA for 30 years. Therefore the EPA risk analysis is irrelevant.

### **Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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Subject CCMA DRMP/DEIS Comments (Comment #11)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #11**

**Subject: 2008 EPA Risk Document Errors**

### **Referring to the Following Paragraph**

The scenarios are designed to reflect the spectrum of activities an individual would participate in during a typical day, weekend, or work year visit to CCMA, e.g., driving in, riding motorcycles, camping, and driving out.

### **Discussion**

The test methodology used did not simulate a typical day. Most motorcycle riders spend the majority of the day on single track.

### **Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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Subject CCMA DRMP/DEIS Comments (Comment #10)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #10**

**Subject: 2008 EPA Risk Document Errors**

### **Referring to the Following Paragraph**

Data for the exposure assessment was collected using activity-based sampling, **simulating typical CCMA recreational activities** and collecting samples from the breathing zone of participants, and the samples were analyzed using transmission electron microscopy (TEM).

### **Discussion**

The test methodology used did not simulate how a human breaths. The test procedure used by EPA simulated how a machine would breath, that is on a timed bases. Humans on the other hand instinctively hold their breath under heavy dust conditions. The EPA test therefore does not reflect reality and is flawed.

### **Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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Subject CCMA DRMP/DEIS Comments (Comment #9)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Comment #9**

**Subject: 2008 EPA Risk Document Errors**

**Referring to the Following Paragraph**

Assessment and provide more robust information to BLM on the asbestos exposures from **typical CCMA recreational activities** and the excess lifetime cancer risks associated with those exposures.

**Discussion**

The EPA report did not use typical recreational activities. The average rider does not ride at CCMA for 30 years.

**Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

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Subject CCMA DRMP/DEIS Comments (Comment #8)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #8**

### **Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

The CCMA RMP shall guide the management of the lands and resources administered by the Hollister Field Office in CCMA to achieve the following: 1) minimize asbestos exposure 2) reduce asbestos emissions

### **Discussion**

The EPA report regarding health risks associated with Asbestos at CCMA does not apply to average recreational users, rather it was based on 30 year usage. Until a study which depicts normal recreational usage study is provided by the EPA, BLM is required to remove all references to Asbestos risks to recreation users.

### **Recommendation**

Remove reference number #1 and #2.

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Subject CCMA DRMP/DEIS Comments (Comment #7)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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**Comment #7**

**Subject: Erroneous Statement**

**Referring to the Following Paragraph**

The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides **significant new information** that must be incorporated into a land use plan to evaluate the public health risk associated with BLM land use authorizations..

**Discussion**

The EPA report indicates the information regarding health risk is uncertain. BLM should not consider the EPA report as "significant".

**Recommendation**

Replace the sentence as follows:

The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides **insignificant new information**.

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Subject CCMA DRMP/DEIS Comments (Comment #6)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #6**

**Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

The overall vision for management of BLM-administered lands in CCMA, derived from public scoping, inter-agency dialogue, and BLM's interdisciplinary team, is "to improve natural, cultural, and open space values across the landscape for the **protection of human health** and the environment; and pursue recreation opportunities through partnerships and collaboration for the enjoyment and use of a growing and diverse populations of current and future generations."

### **Discussion**

The EPA report fails to show there are any health risks by not providing an Epidemiology report which would back up their data.

### **Recommendation**

Remove the reference to "protection of human health".

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Subject CCMA DRMP/DEIS Comments (Comment #5)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
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### **Comment #5**

**Subject: Not following NEPA guidelines**

### **Referring to the Following NEPA Paragraph**

(b) Implement procedures to make the NEPA process more useful to decisionmakers and the public; to reduce paperwork and the accumulation of extraneous background data; and to emphasize real environmental issues and alternatives. Environmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses.

### **Discussion**

BLM has provided incorrect information to the EPA regarding OHV activity. The EPA Asbestos risks are based on 30 year usage and there is no evidence that any recreation by individuals is being done every year for 30 years straight.

### **Recommendation**

Remove all information concerning the EPA risk analysis. Ask the EPA to provide information on risk assessments based on recreational use.

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Subject CCMA DRMP/DEIS Comments (Comment #4)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
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#### **Comment #4**

#### **Subject: Erroneous Statement**

#### **Referring to the Following Paragraph**

The EPA study determined that visitor use on public lands in CCMA can increase the long-term risk of cancer from exposure to asbestos.

#### **Discussion**

The following is from the 2008 EPA report.

In summary, the asbestos exposures that EPA measured at CCMA are high and the resulting health risks are of concern.

#### **Recommendation**

Change the report to show "the EPA has a concern regarding the risks but there are uncertainties inherent in risk assessment".

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Subject CCMA DRMP/DEIS Comments (Comment #3)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #3**

**Subject: Incomplete Data**

**Referring to the Following Paragraph**

Page 135

### **Discussion**

It is critical to know the number of unique visitors because the health assessment risk is based on individual exposure.

### **Recommendation**

The report needs to indicate that the BLM doesn't have information regarding the number of unique visitors to the CCMA area.

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Subject CCMA DRMP/DEIS Comments (Comment #2)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #2**

**Subject: Not following NEPA guidelines**

### **Referring to the Following Paragraph**

Alternative A represents the 'No Action' alternative and would reaffirm current management under the 1984 Hollister RMP (as amended). BLM would incorporate new health risk information into public outreach and education asbestos hazard information program to mitigate public health risk.

### **Discussion**

The NEPA 1502.14 (d) requires BLM to provide a No Action alternative. BLM has failed to provide a No Action alternative but instead has added conditions to the No Action Alternative.

### **Recommendation**

Provide a No Action Alternative without conditions as required by NEPA.

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Subject CCMA DRMP/DEIS Comments (Comment #1)

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
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### **Comment #1**

#### **Subject: Erroneous Statement**

#### **Referring to the Following Paragraph**

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. **The result of the study concluded** that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found an increased long-term cancer risk from engaging in many of the typical recreational activities at the CCMA.

#### **Discussion**

The EPA report (May 2008) clearly states that the risks are uncertain (marked in bold).

"Uncertainty related to the toxicity parameters of the risk characterization includes the application of the IRIS and OEHHA asbestos toxicity values, which were developed from epidemiological studies of occupational exposures, to infrequent and episodic recreational exposures. **This uncertainty could mean that the actual risks could be much lower than those estimated in the CCMA assessment**"

#### **Recommendation**

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

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**Subject: Incomplete Data**

**Referring to the Following Paragraph**

1992 PTI document submitted to BLM.

"Similarly, the URF derived from data on mesothelioma incidence in a population exposed to chrysotile asbestos in a mining setting is 0.031 (f/cc)-1 (McDonald et al. 1980; Berman 1992, pers. comm.), which is 7 times lower than the current URF for asbestos. Thus, use of the current URF may result in a 7 to 200-fold overestimate of risks for exposures to chrysotile asbestos at the CCMA."

**Discussion**

BLM failed to mention the PTI study done in 1992. This report clearly indicates the EPA study which uses the IRIS toxicity values will have an overestimate of 7 times.

**Recommendation**

BLM needs to include the PTI information in the EIS, or remove all references that are made to the EPA risk assessment.

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**Subject: Erroneous Statement**

### **Referring to the Following Paragraph**

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. **The result of the study concluded** that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found an increased long-term cancer risk from engaging in many of the typical recreational activities at the CCMA.

### **Discussion**

From the EPA report (May 2008)

#### 7.2.1 Episodic Exposures

There is uncertainty in using dose-response data derived from occupational studies to predict risk for recreational exposure scenarios. Occupational studies typically consisted of examining exposure to relatively high concentrations of asbestos over relatively extended periods, namely 8 hour work days, 5 days per week, for weeks to years i.e. 5 years.<sup>8</sup> While the asbestos exposures at Clear Creek may be significantly elevated, the type of recreational activity that takes place at CCMA is likely to be less frequent than the occupational exposures that were used to derive the toxicity values of both IRIS and OEHHA. **Because there is no clear mode of action for asbestos induced disease and no threshold for health effects, using a direct time-weighted extrapolation from the longer, chronic occupational exposures to shorter-term, episodic exposures may underestimate or overestimate the risk. The risks could be much lower because** the exposures may be too infrequent or the total retained fiber burden too few to initiate the asbestos disease process. As previously stated, there are several dissimilarities between the exposures evaluated in this study and those used to develop EPA's IRIS risk factor. The occupational exposures were in work environments to commercial asbestos products which were mined and processed for fibrous habit, not to naturally occurring asbestos that exists in various forms and weathering states and was disturbed by recreational activities. However, peer reviewed

epidemiological studies from around the world, e.g. Turkey, Cyprus, Crete, Sicily, New Caledonia, and Wittenoom, Australia,<sup>9</sup> demonstrate that exposure to naturally occurring asbestos causes health effects and death. Because exact toxicity studies on these asbestos forms and activities are not available, the occupational studies are the best approximation.

### **Recommendation**

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

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Subject CCMA DRMP/DEIS Comments

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**Subject: CEQ Regulations**

**Referring to the Following Paragraph**

Email 03/31/2009 from [Johnson.Jere@epamail.epa.gov](mailto:Johnson.Jere@epamail.epa.gov) to Nick Vleisides and CC'ed to Rick Cooper.

For a variety of reasons, it is very difficult to do a valid epidemiological of the health outcomes from either occupational or recreational exposures at CCMA.

**Discussion**

The EPA failed to disclose this very important information in their 2008 CCMA Asbestos Risk Assessment even though Jere Johnson knew about this information well in advance of the report being published. It's required by CEQ (1502.22 Incomplete or unavailable information) to disclose these types of information when it's critical to the assessment.

**Recommendation**

The BLM EIS must indicate there is no epidemiological information available from the EPA because the EPA finds it too difficult to obtain a valid epidemiological report.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:57 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: OHV use and EPA testing**

**Referring to the Following Document**

3.1.4.2 CCMA Visitor Use

Visitor use now (and then) continues to be most prevalent during the winter months (November – April), because winter rainfall keeps the dust levels lower and temperatures cooler, as opposed to the extreme heat and dust present during the dry summer months.

**Discussion**

The EPA testing does not factor in the typical OHV use at CCMA. Why, because they don't have accurate information regarding how many and when visitors recreate at CCMA.

**Recommendation**

Remove EPA Risk Assessments from the DEIS.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:56 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Erroneous Statement**

**Referring to the Following Paragraph**

Changes in social and economic conditions in San Benito County, the San Joaquin Valley, and the entire State of California have led to **increased demand for use of public lands for recreation and energy production**; as well as an increased awareness and social value placed on the cultural and natural resources in the Planning Area.

**Discussion**

On page 135 of the DEIS, visitor use shows a decline. BLM does not provide data to show an increased demand for recreation in the above counties.

**Recommendation**

Remove erroneous statement.

Andy Bajka  
1156 Russell Avenue



Los Altos, CA 94024 [attachment.php?attachmentid=295474&d=](#)



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:55 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Data Quality and Analytic Soundness**

**Referring to the Following Paragraph**

BLM 2005 Land Use Planning Handbook

BLM recognizes that influential information should be subject to a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties, to an **acceptable degree of precision**.

**Discussion**

BLM has failed to follow the Land Use Planning Handbook in that it mandates important data like asbestos risks to have a acceptable degree of precision.

**Recommendation**

Remove all references from the BLM DEIS which references the EPA asbestos risks.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>

03/01/2010 01:55 PM

To <cahormp@ca.blm.gov>

cc

bcc

Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: 2008 EPA Risk Document**

**Referring to the Following Paragraph**

2008 EPA Risk Document

Environmental Health Hazard Assessment (OEHHA) cancer toxicity values for asbestos. Calculations were prepared for 30-year adult exposures, as recommended by the **Superfund risk assessment guidance**.

### **Discussion**

EPA used as guidance procedures from a Superfund site. This has nothing to do with recreational use at CCMA. BLM used the EPA document incorrectly by claiming the EPA document relates to asbestos risks relating to recreational use, which it is not.

### **Recommendation**

Remove all references from the BLM DEIS which references the EPA Asbestos risk analysis.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:54 PM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: 2008 EPA Risk Document Errors**

**Referring to the Following Paragraph**

2008 EPA Risk Document

Using the IRIS toxicity value, as shown in Figure ES-1, EPA's risk estimations found that making **five or more visits to CCMA per year over a 30-year period** to participate in recreational Scenarios 1 (Weekend Rider), 2 (Day Use Rider), 4 (Weekend Hunter), or 5 (Combined Rider/Workday) could put recreational users at an excess lifetime cancer risk above EPA's acceptable risk range of  $1 \times 10^{-4}$  (1 in 10,000) to  $1 \times 10^{-6}$  (1 in 1,000,000).

**Discussion**

From the 1991 EPA Atlas Mine Superfund ROD

FOR EXPOSURE TO AIR DURING OFF-ROAD VEHICLE ACTIVITY, IT WAS ASSUMED THAT A 20-YEAR OLD MALE DRIVES FOR THREE HOURS PER DAY, 16 DAYS PER YEAR FOR FIVE YEARS (THE AVERAGE CASE).

The EPA used a more realistic average in the 1991 ROD and used an incorrect average in the 2008 Risk Document. In either case real numbers need to be used based on counting the visitors. This has never been done so the EPA is guessing. The EPA is required to use accurate data.

**Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:54 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: 2008 EPA Risk Document Errors**

**Referring to the Following Paragraph**

The report provides excess lifetime cancer risk estimates for the seven scenarios. The first five scenarios reflect recreational exposures.

**Discussion**

The report assumes incorrectly that recreational users will visit CCMA for 30 years. No verified data was used to come to the conclusion that the average rider rides at CCMA for 30 years. Therefore the EPA risk analysis is irrelevant.

**Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:54 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: 2008 EPA Risk Document Errors**

**Referring to the Following Paragraph**

The scenarios are designed to reflect the spectrum of activities an individual would participate in during a typical day, weekend, or work year visit to CCMA, e.g., driving in, riding motorcycles, camping, and driving out.

**Discussion**

The test methodology used did not simulate a typical day. Most motorcycle riders spend the majority of the day on single track.

**Recommendation**

Remove any reference from the DEIS which references the EPA risk analysis.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:53 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Erroneous Statement**

**Referring to the Following Paragraph**

The CCMA RMP shall guide the management of the lands and resources administered by the Hollister Field Office in CCMA to achieve the following: 1) minimize asbestos exposure 2) reduce asbestos emissions

**Discussion**

The EPA report regarding health risks associated with Asbestos at CCMA does not apply to average recreational users, rather it was based on 30 year usage. Until a study which depicts normal recreational usage study is provided by the EPA, BLM is required to remove all references to Asbestos risks to recreation users.

**Recommendation**

Remove reference number #1 and #2.

Andy Bajka  
1156 Russell Avenue  
Los Altos, CA 94024



"Andy Bajka"  
<andy2009@bajka.com>  
03/01/2010 01:50 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA RMP/EIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Subject: Incomplete Data**

**Referring to the Following Paragraph**

Page 135

### **Discussion**

It is critical to know the number of unique visitors because the health assessment risk is based on individual exposure.

### **Recommendation**

The report needs to indicate that the BLM doesn't have information regarding the number of unique visitors to the CCMA area.

Andy Bajka  
1156 Russell Avenue



Los Altos, CA 94024 [attachment.php?attachmentid=295474&d=1265049060](#)



AnTBaNkS304@aol.com  
04/19/2010 11:21 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear creek comments

Please approve option A to reopen Clear Creek for OHV usage. I enjoyed exploring this area on my motorcycle. I never visited during any dry or dusty periods. Thank you Anthony Colon



"Art Thompson "  
<gldrflyr@comcast.net>  
03/05/2010 06:28 AM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Access to the clear creek Management Area

To the Bureau of Land Management  
CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

This is a request to have this correspondence entered into public record. I am expressing my desire to have access to Goat Mtn via R001-T104, as well as access to San Carlos Mine Area via R011. My desire is to have access for the expressed purpose of flying Hang gliders off of areas accessed by these trails. I understand the nature of the naturally occurring minerals in this area and would limit my speeds on these routes to minimize the raising of dust, and would support the enforcement of any speed limit deemed necessary. Access would be required by a limited number of 4 wheel drive vehicles usually less than 4; and typically only on weekends during the few months a year that the weather conditions would be promising for cross country flights from these areas. Thanks for allowing me to input this request and I hope you keep this access open for our use.

*athompson*  
2679 Peridot Pl  
San Jose, CA 95132  
408 729-8138



b vaughn  
<urhere2@hotmail.com>  
03/06/2010 01:31 AM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject: Comments on the closure of CLEAR CREEK ORV AREA.

Dear BLM officials,

It is a very sad day when Clear Creek was closed 2 years ago. I live in Washington state, near the Canadian border, and have visited Clear Creek many times for the purpose of motorcycle riding with my cousins from Paso Robles. Clear Creek is my favorite riding area in the United States and I have been to most of the ORV areas on the West coast over the last 20+ years. The sheer size and beauty of riding in such a place made it worth the 17 hour drive. The challenge of the terrain also made the trails rewarding as well.

I *urge* you to re-consider the closure and it's negative impact not only on those that live close by (like my cousins in Paso Robles), but also that it is a treasure for ALL of us in the ORV community and AMERICANS the world over to keep this place open for our generations and future generations to be able to enjoy.

As the old song used to say, "This land is my land, this land is your land...", only it should now be written. "This land is not your land, it's only my land (those in power)." This is not the America I grew up to love. Not the America my father ended up dying for by fighting in the military. Closures and locking the American people from THEIR land is un-American and hauntingly similar to countries in Europe in the early to mid 20th century.

I urge you to reconsider your questionable god of science and turn from the gross injustice of locking away public lands from the taxpaying Americans that have paid for, fought for, and died for.

Sincerely,  
Bryan Vaughn  
5271 Blake Ln.  
Bellingham, WA 98226

Lifetime member-Blueribbon Coalition  
Member- Mt. Baker Motorcycle Club

P.S. I must add; I do put my money where my mouth is and support the groups that oppose these endless land grabs.

For one day our children will ask what it was like to ride horses in the forests, ride motorcycle in the forests, ride bicycles in the forests, drive trucks in the forest, and ride snowmobiles in the forests. *We will respond with silence. For we will have forgotten what it was like.*

---

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**BAMBAMB43@aol.com**  
04/04/2010 10:31 AM

To [cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)  
cc  
bcc  
Subject clear creek

clear creek should be reopened to public useage!!! I have been to many asbestos classes through my work which is for the state of california and this type of asbestos in its natural state does not pose the same health risk. Proper signage to make people aware of asbestos so they can make their own judgement should be all you need to do!!!!!!!!!! this is just another enviromental attack against offroad usage and public access to public lands. this hurts not only offroaders but campers, hikers, hunters, and anyone else who likes the outdoors-----KEEP CLEAR CREEK OPEN LET THE PEOPLE MAKE THERE OWN DECISION-----STOP TRYING TO SAVE US FROM OURSELVES-----THANKYOU, A CONCERNED CALIFORNIAN AND AMERICAN.



**Ben Ellis**  
<bellis46@yahoo.com>  
03/05/2010 07:22 AM

To cahormp@ca.blm.gov  
cc Ben Ellis <bellis46@yahoo.com>  
bcc

**Subject** Re: DRAFT Clear Creek Management Area Resource  
Management Plan & Environmental Impact Statement



Please read the attached file. clear creek.docx



bikefronk@yahoo.com  
02/26/2010 02:16 PM

To "Rick Cooper" <cahormp@ca.blm.gov>  
cc bikefronk@yahoo.com  
bcc

Subject Comments on Clear Creek DEIS

Date: 2/26/2010 Hollister BLM Mr. Rick Cooper Bureau of Land Management, Hollister Field Office  
20 Hamilton Court Hollister CA, 95023 Dear Mr. Rick Cooper,  
To whom it may concern:

My name is Frank Smith; I am an avid outdoorsman, as is my family. I enjoy all aspects of the outdoors, including hiking, skiing, rafting, climbing, photography, hunting, snowmobiling and motorcycling. I am writing this letter to inform you that **NO MORE PUBLIC LANDS SHOULD BE CLOSED TO THE PUBLIC, PERIOD!** For far too long the government has been creating new wilderness areas, that don't even qualify as "Wilderness" areas, areas of critical concern and using so called endangered species to limit and or close off public land to the people who use it most. We public land users have agreed to pay special fees and assessments to the government for the privilege to use our own lands. I have five motorcycles, four snowmobiles, a boat, a fifth wheel trailer a white water kayak and several back packs, climbing gear and skis. I clearly spend more time and money on the outdoors than most users. It's time for me, and people like me, to stand up for our rights to use public lands. We will not be pushed around by special interest groups anymore. We have as much right to use this land, if not more because our fees from registration and permits. Our fees and love for the outdoors supply more money to the government that manages these lands than do so called environmentalists who think no one should use the land. I and my friends are putting you wimpy politicians on notice, change your attitude or we will vote you out of office!!!!!! Free use, not abuse, of public lands for every US citizen! It's our land!

Sincerely, Frank Smith  
2348 Apache Dr. Bishop CA 93514



Bill Zeber  
<jbzeber@yahoo.com>  
01/09/2010 06:01 AM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Comments on BLM Clear Creek Draft Plan-Correction

I have reviewed the BLM Clear Creek Draft Plan and strongly favor Alternative A. My two sons, friends, and I have been enjoying Clear Creek since the early 1970's and it would be sad to see the restrictions imposed by the other alternatives which would deprive future families the great memories we now share. We have enjoyed motorcycle riding, camping, and four wheel drive activities throughout these years and have appreciated BLM's capable management of the area and the staff's always friendly and helpful attitude. Of the dozens of family and friends I know from children to adults, no one has experienced negative health effects from their activities at Clear Creek.

Thank you for the opportunity to comment on this important issue.

Bill Zeber, San Jose



**Billy Petrushkin**  
<bilypetrushkin@yahoo.com>

03/16/2010 09:27 PM

To cahormp@ca.blm.gov

cc

bcc

Subject Comments on Clear Creek Management Area

To whom it may concern,

Hello my name is Billy Petrushkin and I live in Oakhurst CA, I am an avid OHV user and so is my wife and our three daughters. We LOVE riding on BLM land in California and spend many weekends a year doing so. The Clear Creek Management Area has always been a favorite for my family and I and we really miss it. I personally have been visiting the area for fifteen years and think that closing it permanently would be a terrible decision, if the users are aware of the potential hazards then it should be their choice whether to proceed or not. I support the no action alternative and look forward to being allowed access to CCMA again.

Thankyou for your time,

Billy Petrushkin, Oakhurst CA



**"Bob and Judy Wilson "**  
**<bobandjudy4@charter.net>**  
03/13/2010 09:52 PM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Clear Creek Closure

I can't believe you people did this. When I am lying on my death bed, whether or not it is from "asbestos exposure" , I will think of the GREAT times I had at Clear Creek. Why can't you people understand, that no one will live forever, and that we knowingly accepted both the risk from the motor vehicles AND the asbestos, every time we recreated there? When we first started going there in 1975, there were still many "lifers" hanging around there, and to a person they said NO ONE THEY EVER KNEW died of asbestos exposure. Now we know the Clear Creek asbestos is of the non-hooked variety, and is either completely inert or relatively benign. This whole thing smacks of the punishment we are continuing to receive from our Governments at all levels, until we descend into a totalitarian state where ALL our rights will have been stripped, and people will be regularly persecuted for transgressions against the State. Like China, Russia, et. al. Congratulations! Hope you people are real happy with yourselves. You have made many, many people miserable. Sincerely, Robert C. Wilson, San Luis Obispo, California



**"Bob Bishop"**  
<2bbishop@sbcglobal.net>

02/26/2010 12:27 PM

To <Jim\_Abbott@blm.gov>, <Kathryn\_Hardy@blm.gov>

cc

bcc

Subject Do not close Clear Creek

---

Resources should be set aside to insure this park stay open to the public for OHV use.

Bob Bishop



"Bob Rowlands"  
<brow@garlic.com>  
12/09/2009 03:10 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Problem

It just drives me crazy that the safety Nazis feel that public property (Clear creek) should be put off limits to everyone, year round. I can understand closing the area during the summer months due to asbestos dust, but winter too! So my question is how many deaths can be attributed to asbestos poisoning from Clear creek? Or how many dead wild animals been with asbestos poisoning? I'll bet none and I'm sure the Clear Creek asbestos has a unique chemical/mineral tag allowing identification if there were any questionable deaths!

Bob in Hollister and I don't even ride a dirt bike, 4 wheel or a rock hound!

\_\_\_\_\_ Information from ESET Smart Security, version of virus signature database 4674  
(20091209) \_\_\_\_\_

The message was checked by ESET Smart Security.

<http://www.eset.com>



"bobbyg"  
<bobbyg69tiger@gotsky.com>

01/01/2002 12:36 AM

To <cahormp@ca.blm.gov>

cc

bcc

Subject closure

i have ridden for many years in the clear creek area and i believe that closing it to ohv use is a great loss it is public land and should be kept open it was well set up and a fantastic experience for myself and my sons riding pleasure to close it will be a great injustice to the ohv community public land is for public use  
bobbyg



"bondobob2"  
<bondobob2@netzero.com>  
02/21/2010 04:35 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject LAND USE!

**I do not think that the BLM or anyone else has the wright to stop any one from using the land, lakes, rivers or streams! Do not close Clearcreek or any other public lands.**



**Brian Centeno**  
<briancenteno@comcast.net>  
12/11/2009 12:06 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear creek shutdown

As a former resident of Hollister, and a frequent camper, hunter, and off road user of the clear creek area I want to weigh in on the impending closure of this area to off road use. Stop it. You would lock our youth into cities exposing them to the life threatening pathology of urban delinquency- rather than have them face the imagined dangers of asbestos at Clear Creek. This is the usual chicken shit that passes for science in the service of rabid environmentalism. Great job, keep up the good work. The day will come when you officials will be guarding the perimeter of our public lands, so that sallow complected, granola munching, ungulate neo-pagans from the universities may gather there to worship the "poisonous" rocks of Clear Creek. I can't wait.



"Burych, Donna (CIV)"  
<burych@nps.edu>  
04/19/2010 06:24 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA RMP/EIS

Comments on CCMA RMP/EIS from Donna Burych, Pacific Grove, CA

Attention: Field Manager Rick Cooper and CCMA Planning Coordinator

I value the natural and diverse environment of the CCMA and have been dismayed over the heavy use and abuse that occurred from off-road recreation activities over the last decade. I would support usage along the line of Alternative E, where passive non-destructive use is allowed. I have the following comments:

- 1) Access should be allowed on all the county roads. The Idria entry is not passable to regular passenger vehicles.
- 2) I oppose the proposed closure from April 15th to December 1st since most of the flowering season is in May and the creek areas have flowers until late summer. Some sort of access by permit should be allowed year round.
- 3) I oppose new roads/routes in the Condon peak area. The area is impassable in the rainy season due to the clay soils. This area has extensive wildflower displays. The ridge up to the peak is quite steep in areas and building a road would have significant impacts. The ridge is an excellent hiking route and I feel it should remain that way.
- 4) I oppose expansion of recreational vehicle usage into the surrounding Cantua, Condon and Tucker areas. These remote areas would be hard to monitor and since they border private lands would likely lead to conflicts with private property owners. The draft provides very little information about biological resources in the expansion areas. It would be improper to adopt this in a plan without further study. Continuing and regulated use in the current areas would be preferable to expanding usage into new more pristine areas.
- 5) I do support aspects of Alternative C, though my preference would be to limit usage in the CCMA to county roads and passive hiking. It is very important that Alternative C eliminate open barren use areas and limit the route network to a more manageable 150 miles. By limiting travel to marked open routes and banning open barren usage, motorcycle and OHV usage could be more constrained and further damage to the fragile resources could be minimized. The barrens of Larios Canyon are particularly important to be left closed so they can recover.
- 6) For OHV usage to continue in the CCMA, the RMP must clearly identify sufficient levels of funding and staff to monitor and ensure usage is limited to the route network.

In conclusion, I hope that after decades of widespread abuse of the CCMA that your selected alternative will provide for limited and more gentle passive use of the lands. That will insure that future generations can also enjoy this beautiful natural area. To get to that point, the area needs time to recover, and I greatly appreciate your efforts to rehabilitate and protect it.

Sincerely,  
Donna Burych, Pacific Grove, CA



Caleb Ashby  
<caleb.ashby@asphaltrubber.com>

03/05/2010 09:38 PM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>

cc

bcc

Subject Clear Creek

Please Review the attached letter in regards to the Clear Creek Area.

*Caleb Ashby*



Clear Creek comments.doc



Caleb Ashby  
<caleb.ashby@asphalttribber.com>

02/12/2010 12:31 AM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>

cc

bcc

Subject Clesar Creek

### Regarding the Clear Creek draft plan

The unwarranted closer of another public land is a mistake made by the BLM. I truly believe this closure is an infringement of our freedoms. There is several reasons why the Clear Creek area should be open to the public.

First of all Clear Creek is a public land funded with tax dollars. The clear creek area also serves as an outdoor play ground to many OHV enthusiasts which we are losing left and right. Not only does the OHV community enjoy this area with family and friends we also take care of it like it's our own back yard.

Secondly, the Clear Creek area serves as access for pig hunters. Hunting pigs is one of the hardest things to do in California legally. If the BLM keeps Clear Creek closed it forces pig hunters on the wrong side of the law. A side of the law they didn't ask to be on. Also wild pigs in California do more harm to the environment than any OHV. With pigs having one of the fasted population growths in California this decision would only make things worse on the environment and surrounding properties owners.

The last point I want to make on this horrible decision to close a public land is the fiscal impact it will have on surrounding communities. The OHV populations spends a lot of money in local economies for gas, food etc. every year. With California already being in a major recession this will only help to make things worse.

I'm sure the BLM has heard all the points I have made already but I, along with everybody else who enjoys the outdoors, would appreciate serious reconsideration on the decision to close Clear Creek. Most of the decisions that are being made today, with the closing of public lands, are made from an environmental view that fewer and fewer people are being into. Everybody wants to take care of the environment but that doesn't mean closing public lands simply to appease one side of the argument. Currently there is plenty of land for people to go to that want to get away from OHV's and hunters. I don't know the exact amount of land but there is an abundance of wilderness and park lands now where people can go. If we keep closing public lands the government will effectively put a stop to a lot of the things outdoor enthusiasts love to do.

Thanks,

Caleb Ashby



Carolyn Downey  
<csdowney@sbcglobal.net>

03/05/2010 10:49 AM

To cahormp@ca.blm.gov

cc

bcc

Subject Clearcreek

I am a member of the Mariposa Gem and Mineral Club, and our field trips to Clearcreek have been suspended pursuant to closing of Clearcreek. We are very interested in visiting this area with much geological phenomena. Please enter my comments that these public lands should indeed remain "PUBLIC".

Carolyn Downey  
csdowney@sbcglobal.net  
(209) 722-8477  
cell 769-8476



CDWahh@aol.com  
12/09/2009 03:23 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

**PLEASE STOP TAKING OUR LANDS AWAY !!!  
RESTORE CLEAR CREEK RIDING NOW. STOP USING THE SHIELD  
OF POILTICS TO BE A LAND GRABBER. IF WE DON'T USE THIS  
LAND, NOBODY WILL. IS THAT REALLY WHAT YOUR AFTER ??  
HAVING LAND YOU CONTROL BUT WON'T LET ANYONE USE ??? AS  
A VETERAN, THAT IS JUST WRONG AND UN-AMERICAN.  
DO YOUSLEEP AT NIGHT OR DOES YOUR GUILT KEEP YOU  
AWAKE?????  
IS THIS AMERICA OR RUSSIA FOR GOD'S SAKE ?????  
CHRIS WILL  
17371 HWY 156 PRUNEDALE, CA.  
831-663-2573**



CHARLIE MAZZELLA  
<mazzdodgeboy@yahoo.com  
>

04/07/2010 09:27 PM

To cahormp@ca.blm.gov

cc

bcc

Subject CLEARCREEK

To Whom it May Concern,

I would like to wiegh in on the Clear Creek Management area. I am an avid off roader and have heard from freinds & family how great the Clear Creek area used to be for challenging trails. I don't see why after all these years we have to concede & not use this area. Please reopen this recreation area I would like the chance to make my own memories at Clear Creek.

Thanks. Charlie Mazzella  
Coarsegold, Ca.



Chris Beecroft  
<cv70\_00@hotmail.com>  
04/18/2010 10:19 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject DRMP / DEIS

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
**Hollister, CA 95023**  
E-mail to: cahormp@ca.blm.gov  
Fax to: (831) 630-5055

**Dear: Planning Coordinator**

Thank you for this opportunity to participate in the public review of the Bureau of Land Management release of the, *Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement* (DRMP/DEIS).

The 35,000 visitors that recreated at the CCMA have been over whelming other use areas and creating detrimental effects on these other areas from the increased use. There are other areas that had been closed to legal OHV use that are now getting used again because there is very limited areas open for legal OHV use in Central California Area. Mariposa County and others are getting more complaints of private land trespass in the last two years because of the closure of the CCMA and the loss of miles of routes on the National Forests, along with seasonal closures during prime riding time. The BLM instead of planning for increased needs of more OHV vehicles is doing the opposite and trying to the close more areas and routes that are already designated for that use.

The Clear Creek Management Area Draft Resource Management Plan/Draft Environmental Impact Statement states, numerous times, that the analysis of public health and safety is "based primarily" on the EPA *Clear Creek Management Area Asbestos Exposure and Human Health Assessment*. **This Human Health Assessment was conducted in a manner that guaranteed failure.**

Many of the asbestos exposure calculations used a very high amount of "dry" samples despite known visitor use of the Clear Creek Management Area being at its *lowest* level during "dry" conditions. Subsequently, due to the inordinate amount of "dry" samples used in the EPA calculations the amount of "wet" samples was dramatically reduced despite known visitor use of the Clear Creek Management Area being at its *highest* during "wet" conditions, OHV use is restricted to October 15 to June 1. **This methodology guaranteed very high asbestos exposure levels. Or in other words, the methods used by the EPA guaranteed failure.**

**3.1.4.2 Clear Creek Management Area Draft Resource Management Plan/Draft Environmental Impact Statement .**  
“Visitor use now (and then) continues to be most prevalent during the winter months (November-April), because winter rainfall keeps the dust levels lower and temperatures cooler, as opposed to the extreme heat and dust present during the dry summer months. Prior to 2005, public access into CCMA was authorized year-round, and recreation use declined by nearly 80 percent during the summer months, although visitor use would increase significantly with the onset of deer season from August through mid-September.”

Technical Memorandum *Human Health Risk Assessment-Asbestos Air Sampling Clear Creek Management Area, California September 15, 2004* states: “The dry season is assumed to contribute more asbestos fiber-containing dust to the air, while the wet season is assumed to have comparably less asbestos containing dust in the air. On the other hand more motorcycle riders use the CCMA during the cooler weather wet season.”

Below is a graph that *shows the relation of use, to the selection of samples.*

#### Adult Motorcyclist Calculation

Of the 29 samples used to calculate asbestos exposure for the “Adult Motorcyclist”, only 3 were from the “wet” testing. 13 were “moist” and 13 were “dry”. Approximately 45% of the samples used to calculate Adult Motorcyclist exposures were “dry” despite known summer (dry) recreational use of the CCMA being only 20%.

In order for this calculation to represent “typical” Clear Creek Management Area recreation the amount of “dry” samples used would have to be *decreased* by 225 percent and the “wet” samples *increased* by 400%

Conclusion: The Adult Motorcyclist Calculation was conducted in a manner that guarantees high asbestos exposure levels. The other OHV calculations are all similar proportions providing the same conclusions.

The Clear Creek Management Area Draft Resource Management Plan/Draft Environmental Impact Statement has omitted a critical fact: *The Clear Creek Management Area Asbestos Exposure and Human Health Assessment* did not achieve the goal of providing BLM with information on asbestos exposures during “typical” recreational activities. Subsequently, the BLM has included information in the Draft Resource Management Plan/Draft Environmental Statement that is *atypical* or does not accurately represent Clear Creek Management Area recreational activities.

Questions regarding the data collection methods:

Exactly which trails, and how much of the geographical area was used to collect air samples is not clear. It appears that the majority of the data was taken on graded roads, which could reasonably be assumed to be far dustier, due to the volume of traffic from recreational use, cars, trucks, and actual road maintenance by equipment. The vast majority of recreational mileage is

on back roads and single track trail routes that do not seem to be represented in a balanced manner in any sampling. There is no existing data to indicate that air quality is consistent assuming similar usage in different areas.

Risk data was developed using actual epidemiological data from populations of workers who were subjected to “chronic” exposure, meaning constant consistent exposure to significant levels of asbestos over long periods of time... years. There is no data to indicate any risk associated with inconsistent or short-term exposure of recreational usage to Serpentine rock containing abundant Chrysotile asbestos.

---

I can not support any of the alternatives as proposed in the DRMP/DEIS. None of them provide the best out come for OHV use or the public as a whole.

A combination of parts of several alternatives would better serve the public. Alternative A would provide the base that modifications could apply to. 80% of the past visitors at Clear Creek Management Area were motorcyclists. The preferred alternative has no provisions for off-road motorcycle recreation. This is a total reversal of the current and historical use at CCMA. The preferred alternative should include **all types of OHV use.**

Modifications to apply to Alt. A would be:

1. Designate the entire 75,000 acres CCMA as a “Limited” vehicle use area.
2. Establish new campground, staging area, and OHV recreation facilities outside the ACEC.
3. Establish staging area and campground for motorized access (**OHV**) to Condon Peak from Coalinga-Los Gatos Road and in the Cantua Zone from New Idria Road.
4. Acquire lands from willing sellers in the Tucker Mt. area. Acquire state lands and private in-holdings from willing sellers through acquisition or exchange. Acquire lands from willing sellers south of CCMA to Coalinga-Los Gatos road to provide more area for the addition of proposed trail routes already identified in Alternative D and **NEW planned trail routes for OHV (4X4, ATV & Single Track Motorcycle trails)in Tucker Mt., Cantua, and Condon Peak/White Ck. Zones** , outside of the ACEC that would provide trail recreation with less exposure to Chrysotile form of asbestos found mostly in the ACEC
5. Vehicle use in the ACEC management zone would be limited to already designated routes in “Alt. A”.
6. These measures would allow the public access away from the ACEC without closing the ACEC.

There appear to be no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. These employees spend far more time in the area than recreational visitors, so if the employees are not experiencing related asbestos health problems then there must not be any real health risk.

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure

hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports, which are not supported by actual health cases at Clear Creek.

Sincerely

Chris Beecroft  
1137 Lillian Dr.  
Modesto, Ca. 95355  
Member - 4X4 In Motion

---

The New Busy is not the old busy. Search, chat and e-mail from your inbox. [Get started.](#)



"Chris Carbonel "  
<chrisarbonel@cox.net>  
03/07/2010 12:13 PM

To <rick\_cooper@blm.gov>  
cc  
bcc  
Subject BLM sale of lands Tucker Zone

Dear Mr. Cooper

I spoke with you at an earlier meeting and explained that I have been hunting the BLM land (Tucker Mtn) for close to 30 years. It has always been my understanding that BLM had an easement from clear creek through Baker canyon. In fact years ago their was a sign up sheet for those traveling this easement thru privet land to BLM.

Now, I own land which borders the BLM through Baker canyon, (Tucker Zone). I am a firm believer that BLM belongs to the people and should not be sold to privet individuals.

**PLEASE BE ADVISED, IF BLM FEELS THEY DO NOT HAVE AN EASEMENT FROM CLEAR CREEK TO BAKER CANYON I WILL DEED BLM A EASEMENT THROUGH MY PROPERTY FOR PUBLIC ACCESS.**

**THEIR IS NO NEED TO SELL THE PEOPLES LAND.**

**SINCERELY,  
CHRIS CARBONEL**



Chris Hiatt  
<hiattch@sbcglobal.net>  
12/07/2009 01:17 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject clear creek

I am totally disgusted with the closure of Clear Creek. How, after all these years of ranchers living in this area there has not been a spike of cancer related to asbestos? Why can't Clear Creek be like other California buildings, by putting up a sign that says this area is known to have things that "might" cause cancer. Then they would be not legally-liable. All the winters I have road there, it is almost never dusty. When it is dusty in the spring or late fall you could close it, and most riders would still be riding the Sierras or other areas anyways. Let us use this beautiful remote area that no one else will use anyways due to all the mines. I live in North Dakota during the summers due to my work, and they are opening places to ride, because they know its a growing industry, the public demands it and want the tourist and weekend dollars. I'll pay to ride there, just open it.

Thank you for your consideration,  
Chris Hiatt  
36355 Kensington Dr.  
Madera, CA 93636



chris lessa  
<musiclessa@yahoo.com>  
12/12/2009 06:28 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject PUBLIC COMMENTS ON CLEAR CREEK DRAFT PLAN

To Whom it May Concern,

This contains my comments on the Clear Creek draft plan.

I have learned that the actual danger to health from naturally occurring asbestos is low.

I feel our public lands should stay open and available to the people they belong to namely the public.

The government should has no business telling people what sort of risks they are allowed to take. We are in a free society and as such should be allowed to make our own decisions.

Sincerely,

Christopher



Chris Napolitano  
<littlemaryranch@yahoo.com>

03/08/2010 02:07 PM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>

cc

bcc

Subject Clear Creek

We have been riding the Clear Creek area since the late sixties and in that time I have seen the OHV areas decrease and demand explode. We need more areas like Clear Creek not less. What ever happened to ride or enter at your own risk? Speaking of risk of the over 200 people I know who rode Clear Creek not one as came down with an asbestos related problem and I am talking about family members who started riding the area in the sixties.

Please take this into consideration when you make your final decsion. I feel it would be a public deservice to close the area from the public and all it has to offer everybody.

Thank You

Chirstopher Napolitano  
5750 Felter Rd  
San Jose Ca 95132

Christine  
Sloand/CASO/CA/BLM/DOI  
01/08/2010 06:20 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Just a reminder - upcoming Clear Creek Management  
Area public comment meetings

----- Forwarded by Christine Sloand/CASO/CA/BLM/DOI on 01/08/2010 06:19 AM -----  
karen <karenkds@ix.netcom.com>

01/07/2010 03:03 PM

To Christine\_Sloand@ca.blm.gov  
cc  
Subject Re: Just a reminder - upcoming Clear Creek Management Area public comment meetings  
t

Why do you want to waste your time on these meetings? You don't listen to the public or go with the true facts. You want to close Clear Creek and that is it. I have been riding there since 1969 with no health issues. Does that fact account for anything?  
Joe Sprenger  
1413 Blackstone Ave  
San Jose CA 95118

On Jan 7, 2010, at 2:06 PM, Christine\_Sloand@ca.blm.gov wrote:

> <Postcard\_PubMtgs-DRMP-EIS.pdf>

Christine  
Sloand/CASO/CA/BLM/DOI  
01/08/2010 06:17 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Just a reminder - upcoming Clear Creek Management  
Area public comment meetings

----- Forwarded by Christine Sloand/CASO/CA/BLM/DOI on 01/08/2010 06:17 AM -----

"Steve Knecht"  
<SKnecht@townsenddesign.com>

01/07/2010 05:43 PM

To <Christine\_Sloand@ca.blm.gov>  
cc  
Subject RE: Just a reminder - upcoming Clear Creek Management Area public  
comment meetings

Christine:

Thank you for the reminder. I will be unable to attend any of these meetings but I would like to voice my opinion and I hope you can forward it to the parties that need to see it. I tried to read through the EIS and what I gleaned from it is that this will be one more area that the powers that be are trying to make unavailable to the off road community. I have been on the losing side of so many of these debates I sometime wonder why I even bother. Then my family suggests that we go riding and it becomes clear to me that I have a responsibility as a father, husband, taxpayer, citizen to fight for me right to the land I pay for. KEEP THE OHV AREAS OPEN PLEASE!!!

Thanks again Steve Teri and Ryan Knecht

---

**From:** Christine\_Sloand@ca.blm.gov [mailto:Christine\_Sloand@ca.blm.gov]  
**Sent:** Thu 1/7/2010 2:06 PM  
**To:** Christine\_Sloand@ca.blm.gov  
**Subject:** Just a reminder - upcoming Clear Creek Management Area public comment meetings

Good Afternoon,

Just a reminder of the upcoming Clear Creek Management Area public comment meetings. Please see the attached .pdf file for meeting information. Please feel free to contact us at 831-630-5000 if you need

any further information.

Best regards,  
Christine Sloand  
Bureau of Land Management  
20 Hamilton Court  
Hollister, CA 95023



**Claudia Mitchell**  
<ladyglowhound@yahoo.com  
>

03/03/2010 02:17 PM

To cahormp@ca.blm.gov

cc

bcc

Subject Clearcreek

I am a rock collector who has had the opportunity to camp and collect prior to the current closure of Clearcreek. I have always wanted to go back to collect some other minerals.

Please don't close all access to the Clearcreek area. Despite the dune buggies and motorcycles, there are other groups of us who enjoy this unique area for the opportunity to collect specimens found nowhere else in the world as well as just enjoying the scenery. I was well aware of the asbestos before I went in and was careful to keep the windows up and even wore a mask while going thru the area used for off roading. Given the health information, let us passive users make the choice and allow the Clearcreek area to be used by the public.

Claudia Mitchell



"Curt McDowell"  
<csm@saveclearcreek.org>

03/05/2010 03:05 AM

Please respond to  
<csm@saveclearcreek.org>

To <cahormp@ca.blm.gov>

cc

bcc

Subject Substantive Comments from Curt McDowell

Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

March 5, 2010

Dear Sirs,

Please find attached my comments to the Clear Creek Management Area Draft RMP/EIS and take due consideration of each one.

This document is in Adobe PDF format, is approximately 266KB in size, and contains 24 comments on 48 pages.

I plan to mail a physical copy as well, today, March 5, 2010.

Sincerely,  
Curt McDowell

SaveClearCreek.org  
1474 Nilda Ave.  
Mountain View, CA 94040-3709



DEIS\_Comments\_McDowell.pdf



danrazar@comcast.net  
03/13/2010 09:27 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

Dear BLM representative,

Please re-open the Clear Creek Recreation Area.

Please allow the citizens of California and the United States to decide for themselves the risk of illness or injury to which they will expose themselves.

Please allow me to take personal responsibility for my own life and that of my family.

The EPA conclusions regarding the risk of asbestos exposure from riding at Clear Creek are based on excessively conservative assumptions of tolerable risk. Mmost people only ride several days per year.

I can accept signing a release of liability or an entrance fee to help with management. But the complete exclusion of motorcycle trail riding is an extreme and unnecessary decision.

Please inform the public- do not try to unnecessarily restrict our recreation opportunities at Clear Creek. Please re-open all the Clear Creek trails.

Sincerely,

Dan R. Azar MD MPH

4857 Windermere Drive  
Newark CA 94560

408-313-0019



"Darell Kroeker"  
<darell@gobronco.com>  
01/23/2010 06:59 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek

To whom it may concern, and this should be all of us.

I and my family have visited Clear Creek on several occasion throughout the past 30 years. Not one of us has had any health issues because of it. My understanding is the the esbestos that is found there is not of the industrial type that causes any type of health issues.

I know that there has been a study done and it took some 19 months to do it. Why shouldn't us, the other side have some time to make our recommendation. This is an area that has been and should still be available to the public for recreation.

It just seems as though ever time someone coughs, there needs to be another park or recreation area closed. This is not in the interest of public land usage.

Darell L. Kroeker  
1573 Ferndale Dr  
San Jose, Ca 95118

408.316.2061



"Dave & Krissy"  
<olson16@frontiernet.net>  
03/03/2010 05:55 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Ccma

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
E-mail to: [cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)  
Fax to: (831) 630-5055

Dear: Planning Coordinator

Thank you for this opportunity to participate in the public review of the Bureau of Land Management release of the, Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS).

I can not support any of the alternatives as proposed in the DRMP/DEIS. None of them provide the best out come for OHV use or the public as a whole.

A combination of parts of several alternatives would better serve the public. Alternative A would provide the base that modifications could apply to.

Modifications to apply to Alt. A would be:

1. Designate the entire 75,000 acres CCMA as a "Limited" vehicle use area.
2. Establish new campground, staging area, and OHV recreation facilities in the Cantua Zone.
3. Establish staging area and campground for motorized access (OHV) to Condon Peak from Coalinga-Los Gatos Road.
4. Vehicle use in the CCMA management zones would be limited to already designated routes in "Alt. A" and the addition of proposed trail routes already identified and NEW planned trail routes for OHV (4X4, ATV & Single Track Motorcycle trails), outside of the ACEC that would provide trail recreation with less exposure to Chrysotile form of asbestos found mostly in the ACEC.
5. These measures would allow the public access away from the ACEC without closing the ACEC.
6. 80% of the past visitors at Clear Creek Management Area were motorcyclists. The preferred alternative has no provisions for off-road motorcycle recreation. This is a total reversal of the current and historical use at CCMA. The preferred alternative should include all types of OHV use.

There appears to be no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. These employees spend far more time in the area than recreational visitors, so if the employees are not experiencing related asbestos health problems then there must not be any real health risk.

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports, which are not supported by actual health cases at Clear Creek.

Sincerely  
David Olson



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DaveW  
<davew99@sbcglobal.net>

03/03/2010 06:24 PM

Please respond to  
davew99@sbcglobal.net

To cahormp@ca.blm.gov

cc

bcc

Subject Clear Creek DRMP/DEIS

Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
E-mail to:cahormp@ca.blm.gov  
Fax to: (831) 630-5055

Dear: Planning Coordinator

Thank you for this opportunity to participate in the public review of the Bureau of Land Management release of the, Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS).

I can not support any of the alternatives as proposed in the DRMP/DEIS. None of them provide the best out come for OHV use or the public as a whole.

A combination of parts of several alternatives would better serve the public. Alternative A would provide the base that modifications could apply to.

Modifications to apply to Alt. A would be:

1. Designate the entire 75,000 acres CCMA as a "Limited" vehicle use area.
2. Establish new campground, staging area, and OHV recreation facilities in the Cantua Zone.
3. Establish staging area and campground for motorized access (OHV) to Condon Peak from Coalinga-Los Gatos Road.
4. Vehicle use in the CCMA management zones would be limited to already designated routes in "Alt. A" and the addition of proposed trail routes already identified and NEW planned trail routes for OHV (4X4, ATV& Single Track Motorcycle trails), outside of the ACEC that would provide trail recreation with less exposure to Chrysotile form of asbestos found mostly in the ACEC.
5. These measures would allow the public access away from the ACEC without closing the ACEC.
6. 80% of the past visitors at Clear Creek Management Area were motorcyclists. The preferred alternative has no provisions for off-road motorcycle recreation. This is a total reversal of the current and historical use at CCMA. The preferred alternative should include all types of OHV use.

There appear to be no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. These employees spend far more time in the area than recreational visitors, so if the employees are not experiencing related asbestos health problems then there must not be any real health risk.

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports, which are not supported by actual health cases at Clear Creek.

Please accept the above comments as if they were my own as they best represent my view points on the DRMP/DEIS.

Sincerely,  
Dave Wheeler  
5635 Marlin Dr  
Discovery Bay, Ca 94505



David Doudna  
<dave@doudna.com>  
03/04/2010 11:56 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject comments on CCMA RMP/EIS

810 Parnell Place  
Sunnyvale, CA 94087

March 4, 2010

BLM  
Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

To Whom It May Concern -- an open letter to the BLM:

I am writing to express my concerns about the future of the Clear Creek Management Area, and in particular, public access of Clear Creek Road.

Since the early 1990's, I enjoyed my rides once or twice a year that have included the county roads: New Idria Road, Clear Creek Road, and occasional side trips down Mexican Hat et al. The complete closure of Clear Creek has prevented one of my all-time favorite day rides. It's all the more frustrating to hear that this is supposedly being done in my best interest, for a risk that is negligible considering the limited exposure, if it indeed exists at all. My risk from a collision with a vehicle on highway 25 exceeds any risk of exposure to the air at CCMA.

It is my hope that the BLM will respond to the public wishes, and completely reopen the entire CCMA roads and trails to all recreational users.

If not, I hope some compromise may be reached that at least will keep Clear Creek Road open to all vehicles traveling between New Idria and Coalinga Roads, including street-legal motorcycles.

Some of the draft RMP's alternatives refer to allowing road access "limited to full-sized vehicles," however the term "full-sized vehicle" is never defined. My touring vehicle of choice is a BMW R100GS, a full-size highway-legal touring motorcycle. I fear that limiting access to "full-sized vehicles" may be implemented in practice as prohibiting all motorcycles. Discussion with BLM staff has indicated that "full-sized vehicles allowed" is BLM-speak for "all motorcycles prohibited."

The Resource Management Plan must be clearly written in a way that honestly describes the access available. If street-legal vehicles will be allowed to travel on Clear Creek Road, say so. If you intend to arbitrarily and unjustly discriminate against all two-wheeled vehicles, then clearly admit that in the RMP. But don't hide behind undefined terms like "full-sized vehicles." Such obscurities have no place in an official document such as the CCMA RMP/EIS which affects so many of the public, including myself, my wife (who also rides), and our children (who we hope will still have places to ride).

Sincerely,  
David Doudna



BLM\_CCMA\_RMP\_EIS\_comments\_20100304.pdf



"David Furrer"  
<davidf@jps.net>  
03/16/2010 10:17 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek

Hello.

I am writing to express my concern with the closure of Clear Creek OHV Park. My family has ridden off-road motorcycles for over 40 years and would like to continue to do so. The riding areas I grew up with are being closed one by one and it is making it difficult for me to pass on this family tradition with my children.

Off Road riding is a great family sport and it keeps my children away from Play Stations, Wii's and other couch-potato activities. A great weekend of riding builds confidence, brings our family closer and gives my children a healthy outdoor experience.

Please consider these comments when making your decision.

Thanks

**David Furrer**  
**Lincoln, CA**



David Stuck  
<davidstuck@hotmail.com>  
03/05/2010 02:02 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CLEAR CREEK PUBLIC COMMENTS

Here is comments for the Clear Creek Health Risk Assessment/EIR/Draft Management Plan submitted by: David Stuck, 2612 Hollister, Simi Valley, CA 93065

PLEASE RESTRICT MY NAME AND ADDRESS FROM PUBLIC DISCLOSURE

### COMMENT #1

Nothing presented so far in the Health Risk Assessment demonstrates a severe risk for anyone other than motorcycle riders and other ATV riders who spend a lot of time ripping up the hillsides at high speeds. The "Weekend hunter scenario" (which includes campers, hikers, rock collectors) can make 5 visits per year under No Action conditions, **and the mean risk is still within the acceptable risk level of  $1 \times 10^{-4}$  excess cancers.** If the outlier data points (two points were anomalously 5 and 10 times the value of all the rest of the data) are excluded from the calculations (per EPA Guidelines), the risk would be even less!

CONCLUSION: That **means BLM's own Health Risk Assessment does not support any reason to exclude anyone other than the motorcyclists/off road riders ("motorized sports").**

### COMMENT #2

The proposed alternatives offered to the public were extremely limited in number and scope. With the number of components which go into a single alternative listed in the draft management plan, the universe of potential alternatives could number in the dozens using the various combinations of individual components. The alternatives were clearly "cherry picked" by BLM to give FALSE OPTIONS to the public, in order to justify BLM's preferred alternative of severely restricting public access. **OBVIOUS SAFE ALTERNATIVES WERE EXCLUDED FROM PUBLIC CONSIDERATION.**

### COMMENT #3

One such obvious Safe alternative excluded from public consideration by BLM includes: 1) move the motorcyclists out of the serpentine area to new designated area in the Clear Creek Management Area 2) **surface the access roads with inexpensive Chipseal to reduce airborne asbestos by 98%\*\*** 3) Place speed limits on unpaved/untreated roads 4) Pave/treat campground roads and import clean fill dirt for the campground pads. 5) **allow unrestricted non-motorized sports access.** 6) Keep all Roads open. My alternative will reduce the SUV risk from driving in on access roads by 98%, and the Camping risk by 98% (thus reduce the total risk in the "Weekend Hunter Scenario" by 98%).  $1 \times 10^{-4} / 98 = 1.02 \times 10^{-6}$  risk = approximately 1 in a million excess cancers **= unrestricted land use per Federal EPA guidelines (as referenced in the BLM's Clear Creek Health Risk Assessment).**

\*\*per studies performed by Cal/EPA Department of Toxic Substances Control

**COMMENT #4**

Public access on existing roads must be preserved. Therefore alternatives E, F, G are not acceptable.

**COMMENT #5**

As usual, BLM in typical government fashion, is going from the most destructive land use (a motorcycle park) to the most protective (closing roads and restricting public access), with absolutely no consideration to a moderate and safe middle ground. (Therefore alternatives E, F, G are not acceptable).

**COMMENT #6**

I want to review the "Responsiveness Summary" to see what BLM has to say regarding each of the public comments submitted.  
The Responsiveness Summary must be made public, and in a form readily accessible by the public.

---

Hotmail: Free, trusted and rich email service. Get it now.



David & Lori Tharp  
<waterspot@verizon.net>  
04/22/2010 08:41 AM

To "jim\_abbott@ca.blm.gov" <jim\_abbott@ca.blm.gov>  
cc <OHVCommission@parks.ca.gov>,  
<Rick\_Cooper@blm.gov>  
bcc

Subject Clear Creek Management Area

Mr. Abbott

I have just finished reading The Friends of Clear Creek Management Area (FOCCMA) response to the Clear Creek Management Area Resource Plan and Draft Environmental Impact Statement (DEIS).

The FOCCMA has highlighted something else that was not stated in their response, the actions of the Bureau of Land Management (BLM) and the resulting DEIS are a succinct example of how incompetent the BLM is when it pertains to understanding and interpreting data as well as understanding the resources on the lands that the BLM is trusted to responsibly manage.

The photographs shown in the FOCCMA response is the only topic I will address in this letter.

Not only does it appear that the BLM and the EPA have manipulated the data by grooming the roads prior to the sample acquisition sessions but they have failed to understand the typical behavior of the main user group in the CCMA, the off road rider.

The main image that I dispute is what FOCCMA is calling image # 3. Now there are three statement I would like to make concerning this image as it represents the off road rider.

First, as a long time rider in many Off Road Vehicle (OHV) areas, not just the CCMA, typically the experienced riders will avoid roads in dry times. This is because of the loose surface, dust clouds created, and visibility issues present in these conditions. It is flat out not fun to operate an OHV in these conditions.

Second, if a rider or group of riders need to use a road they will typically ride very close to each other thus remaining out of the dust cloud. If you look at image three there are several areas alongside the lead rider where most riders would attempt to be, rather than trailing 30 meters behind, in the dust cloud.

Third, if it is not possible to stay away from the dusty areas riders will space themselves to stay out of the clouds of dust created by lead riders. Again it is not fun to ride when it is difficult to see where one is riding.

It is alarming that the BLM continues to misrepresent the main user group of a recreation area. It is also hard to understand why the BLM has for so long not tapped into the expertise of many who understand the resources in the areas they manage. I have seen this arrogance exhibited by the BLM in many areas that the agency manages, not just the CCMA. Why won't the BLM put managers who understand the unique resources in control of those resources?

Sincerely  
David Tharp



FOCCMA Master.pdf



David & Lori Tharp  
<waterspot@verizon.net>  
03/05/2010 08:24 AM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject DEIS response

I have attached my response to the DEIS as per BLM request. David Tharp



DEIS\_responce\_DT.doc



daidsundholm@gmail.com  
03/03/2010 01:57 PM

To "Rick Cooper" <cahormp@ca.blm.gov>  
cc daidsundholm@gmail.com  
bcc  
Subject Comments on Clear Creek DEIS

Date: 3/3/2010 Hollister BLM Mr. Rick Cooper Bureau of Land Management, Hollister Field Office 20 Hamilton Court Hollister CA, 95023 Dear Mr. Rick Cooper, Everthing has a risk. Post your findings on a sign but do not close the area. The government does not need to be a nanny for all it's citezens. If we were really worried about the health of our people we would have outlawed cars long ago. Sincerely, David Sundholm P.O. Box 6737 Ketchum ID 83340



"deadendd@juno.com"  
<deadendd@juno.com>  
04/19/2010 08:58 AM

To cahormp@ca.blm.gov  
cc granat.amy@gmail.com, User501968@aol.com,  
d36lao@volcano.net, damador@cwo.com, jcfields@crpa.org  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
E-mail to: cahormp@ca.blm.gov  
Fax to: (831) 630-5055

Dear: Planning Coordinator

Thank you for this opportunity to participate in the public review of the Bureau of Land Management release of the, Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS).

Attached is my comment letter in a Word doc. format.

Thanks  
Michael Damaso  
1119 East Linwood Ave.



Mike.s 4-19 CCMA comment letter.doc



Debbie Ward  
<wardjnd@yahoo.com>  
02/27/2010 05:47 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject

Attached to this e-mail is a brief word document expressing my views on the CCMA Draft RMP/EIS. I have also sent a hard copy to your office via USPS.

Thank you.



Letter to BLM concerning the CCMA plan 2-26-10.doc



dee murphy  
<momagna@yahoo.com>

01/22/2010 10:42 PM

To cahormp@ca.blm.gov

cc

bcc

Subject Clear Creek

The Meeting went well for amount of people at the CCMA meeting. I believe that the great showing of people (even from Burney, CA) should show the BLM how important the Clear CreeK CCMA area is to us. Please considered that we are all willing to take risks everyday by dricving in a car, going to work and just living day-to-day. Please open Clear Creek up so my children and grand children in the far future can ride at Clear Creek as I have. For the people and paid for by the people. We will show up on May 2, 2010. Dee Murphy



Dennis Scroggins  
<scroggy12@yahoo.com>  
04/19/2010 08:17 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments

Attention: Planning Coordinator

Bureau of Land Management

Hollister Field Office

20 Hamilton Court

**Hollister, CA 95023**

E-mail to: cahormp@ca.blm.gov

Fax to: (831) 630-5055

**Dear: Planning Coordinator**

Thank you for this opportunity to participate in the public review of the Bureau of Land

Management release of the, *Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement* (DRMP/DEIS).

The 35,000 visitors that recreated at the CCMA have been over whelming other use areas and creating detrimental effects on these other areas from the increased use. There are other areas that had been closed to legal OHV use that are now getting used again because there is very limited areas open for legal OHV use in Central California Area. Mariposa County and others are getting more complaints of private land trespass in the last two years because of the closure of the CCMA and the loss of miles of routes on the National Forests, along with seasonal closures

during prime riding time. The BLM instead of planning for increased needs of more OHV vehicles is doing the opposite and trying to close more areas and routes that are already designated for that use.

The Clear Creek Management Area Draft Resource Management Plan/Draft Environmental Impact Statement states, numerous times, that the analysis of public health and safety is “based primarily” on the EPA *Clear Creek Management Area Asbestos Exposure and Human Health Assessment*. **This Human Health Assessment was conducted in a manner that guaranteed failure.**

Many of the asbestos exposure calculations used a very high amount of “dry” samples despite known visitor use of the Clear Creek Management Area being at its *lowest* level during “dry” conditions. Subsequently, due to the inordinate amount of “dry” samples used in the EPA calculations the amount of “wet” samples was dramatically reduced despite known visitor use of the Clear Creek Management Area being at its *highest* during “wet” conditions, OHV use is restricted to October 15 to June 1. **This methodology guaranteed very high asbestos exposure levels. Or in other words, the methods used by the EPA guaranteed failure.**

**3.1.4.2 Clear Creek Management Area Draft Resource Management Plan/Draft Environmental Impact Statement** . “Visitor use now (and then) continues to be most prevalent during the winter months (November-April), because winter rainfall keeps the dust levels lower and temperatures cooler, as opposed to the extreme heat and dust present during the dry summer months. Prior to 2005, public access into CCMA was authorized year-round, and recreation use declined by nearly 80 percent during the summer months, although visitor use would increase significantly with the onset of deer season from August through mid-September.”

Technical Memorandum *Human Health Risk Assessment-Asbestos Air Sampling Clear Creek Management Area, California September 15, 2004* states: “The dry season is assumed to contribute more asbestos fiber-containing dust to the air, while the wet season is assumed to have comparably less asbestos containing dust in the air. On the other hand more motorcycle riders use the CCMA during the cooler weather wet season.”

Below is a graph that *shows the relation of use, to the selection of samples.*

#### Adult Motorcyclist Calculation

Of the 29 samples used to calculate asbestos exposure for the “Adult Motorcyclist”, only 3 were from the “wet” testing. 13 were “moist” and 13 were “dry”. Approximately 45% of the samples used to calculate Adult Motorcyclist exposures were “dry” despite known summer (dry) recreational use of the CCMA being only 20%.

In order for this calculation to represent “typical” Clear Creek Management Area recreation the amount of “dry” samples used would have to be *decreased* by 225 percent and the “wet” samples *increased* by 400%

Conclusion: The Adult Motorcyclist Calculation was conducted in a manner that guarantees high asbestos exposure levels. The other OHV calculations are all similar proportions providing the same conclusions.

The Clear Creek Management Area Draft Resource Management Plan/Draft Environmental Impact Statement has omitted a critical fact: *The Clear Creek Management Area Asbestos Exposure and Human Health Assessment* did not achieve the goal of providing BLM with information on asbestos exposures during “typical” recreational activities. Subsequently, the BLM has included information in the Draft Resource Management Plan/Draft Environmental Statement that is atypical or does not accurately represent Clear Creek Management Area recreational activities.

Questions regarding the data collection methods:

Exactly which trails, and how much of the geographical area was used to collect air samples is not clear. It appears that the majority of the data was taken on graded roads, which could reasonably be assumed to be far dustier, due to the volume of traffic from recreational use, cars, trucks, and actual road maintenance by equipment. The vast majority of recreational mileage is on back roads and single track trail routes that do not seem to be represented in a balanced manner in any sampling. There is no existing data to indicate that air quality is consistent assuming similar usage in different areas.

Risk data was developed using actual epidemiological data from populations of workers who were subjected to “chronic” exposure, meaning constant consistent exposure to significant levels of asbestos over long periods of time... years. There is no data to indicate any risk associated with inconsistent or short-term exposure of recreational usage to Serpentine rock containing abundant Chrysotile asbestos.

-----  
-----  
I can not support any of the alternatives as proposed in the DRMP/DEIS. None of them provide the best out come for OHV use or the public as a whole.

A combination of parts of several alternatives would better serve the public. Alternative A would provide the base that modifications could apply to. 80% of the past visitors at Clear Creek Management Area were motorcyclists. The preferred alternative has no provisions for off-road motorcycle recreation. This is a total reversal of the current and historical use at CCMA. The preferred alternative should include **all types of OHV use.**

Modifications to apply to Alt. A would be:

1. Designate the entire 75,000 acres CCMA as a "Limited" vehicle use area.
2. Establish new campground, staging area, and OHV recreation facilities outside the ACEC.
3. Establish staging area and campground for motorized access (*OHV*) to Condon Peak from Coalinga-Los Gatos Road and in the Cantua Zone from New Idria Road.
4. Acquire lands from willing sellers in the Tucker Mt. area. Acquire state lands and private in-holdings from willing sellers through acquisition or exchange. Acquire lands from willing sellers south of CCMA to Coalinga-Los Gatos road to provide more area for the addition of proposed trail routes already identified in Alternative D and *NEW planned trail routes for OHV (4X4, ATV & Single Track Motorcycle trails) in Tucker Mt., Cantua, and Condon Peak/White Ck. Zones*, outside of the ACEC that would provide trail recreation with less exposure to Chrysotile form of asbestos found mostly in the ACEC
5. Vehicle use in the ACEC management zone would be limited to already designated routes in "Alt. A".
6. These measures would allow the public access away from the ACEC without closing the ACEC.

There appear to be no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. These employees spend far more time in the area than recreational visitors, so if the employees are not experiencing related asbestos health problems then there must not be any real health risk.

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports, which are not supported by actual health cases at Clear Creek.

Sincerely,

Dennis Scroggins

Tri-County Offroad

Merced Dirt Riders

744 Kimball st.

Oakdale, Ca 95361

Scroggy12@yahoo.com



ED SANTIN  
<santins@sbcglobal.net>  
03/03/2010 07:35 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek area closure.

Dir Sirs.

Please reverse your direction as your intended closure of the clear creek riding area.. Using the natural Asbestos that is the same as in Eldorado's County. Placer ville and Eldorado's hills area to close this area to ohv is a cop out on doing your job to manage the area for the public not against them..Ohv has invested lots of our money over the years to support the area... If you intend to close it be prepared to pay back the money you have used or open an equally sized area in Northern California to Ohv... Your choice... Ed Santin AMA/d36 offroad congressman...



**Ed & Eileen Ferner**  
**<ferner80@hotmail.com>**  
03/08/2010 07:03 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek

**I am a recreational rock collector and I am quite disappointed with the recent direction access to Clear Creek has been going.**

**Insofar as the possibility of asbestos exposure in the area: we smoke cigarettes with a label on the packet, we drink alcohol with a warning label, we enter public areas and use suspected cancer causing products that are labeled so - why can't we use Clear Creek by putting up a notification sign or having us sign a disclaimer upon entry?**

**Edward Ferner**  
**350 Palomino Lane**  
**San Martin, CA 95046**

---

Hotmail: Trusted email with powerful SPAM protection. [Sign up now.](#)



**enduro@ama-d36.org**  
03/04/2010 04:21 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP/EIS Purpose and Need Comment

Attached: Purpose and Need Comment

**Message from enduro@ama-d36.org:**

comment attached

Google Docs makes it easy to create, store and share online documents, spreadsheets and presentations.



Purpose and Need Comment .pdf



enduro@ama-d36.org  
03/04/2010 04:20 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP/EIS Sec. 4 comment

Attached: Sec. 4 comment

**Message from enduro@ama-d36.org:**

comment attached

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Sec. 4 comment.pdf



**enduro@ama-d36.org**  
03/04/2010 04:19 PM

To [cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)  
cc  
bcc  
Subject CCMA RMP/EIS Alt. D comment

Attached: Alt. D comment

**Message from enduro@ama-d36.org:**

comment attached

Google Docs makes it easy to create, store and share online documents, spreadsheets and presentations.



Alt. D comment.html



**enduro@ama-d36.org**  
03/04/2010 04:15 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP/EIS Page # comment

Attached: Page # comment

**Message from enduro@ama-d36.org:**

Comment Attached

Google Docs makes it easy to create, store and share online documents, spreadsheets and presentations.



Page # comment.pdf



"Eric Olsen"  
<eolsen@crafttechcorp.com>  
03/03/2010 12:41 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject area closings

Recreation areas are closing with no regard to the social costs of the kids. Instead of going out riding and camping they are stuck hanging around the local skate parks or worse sitting in front of the tv. Please keep our riding areas open.

Eric Olsen  
Concerned parent and rider  
909-597-6462  
15982 Oak Canyon Dr.  
Chino Hills, Ca 91709



"Favia, Paul"  
<Paul.Favia@JBTC.COM>  
04/09/2010 03:13 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek RMP Comment

To whom it concerns:

This letter is to express my support of "Alternative A" – please take No Further Action and revert to the 1984 Hollister RMP

This is for a number of reasons.

1. Every American citizen, and visitor, deserves the right to enjoy PUBLIC LAND to the fullest, without being herded by overzealous government agencies into narrow, limited pathways as in Alternative E
2. Alternative A is the only option that is consistent with BLM's stated mission to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations. Please do not try to define or limit the ways in which I can enjoy my public lands.
3. How does the asbestos risk translate into a closure of Public Land??? Warning labels on alcohol and tobacco are deemed sufficient by our society to address the risk posed – these products are not banned. Safe sex is promoted by our society, yet the practice is not banned. California buildings that contain various carcinogenic materials bear warning labels – but continue to be open to the public. I dare say that more death and disease can be attributed to such things, but they are permitted with only a label or sign to explain to the public – proceed at your own risk and responsibility.

Why, WHY is Clear Creek different???? Leave the signs up and be done with this insanity

Respectfully

Paul A. Favia



Frank Mullaney  
<rockyfiv@aol.com>  
03/02/2010 11:49 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Management Area

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

I realize that management of the Clear Creek area is a complex issue. I realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizen, I am interested in only the truth. I know that under this current administration, the EPA has political agendas that use science that may be flawed. I would like to suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titled "Geological Creek Management Area, San Benito County, California". My family and I have used the CCMA for years. We took our children to this area when they were in grade school and they would like to take their children to this area for rockhounding. No one has suffered any ill effects.

I prefer alternative A with the following recommendations added.

- I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of asbestos from this area.
  - A. Let the study "precisely delineate" all dangerous asbestos areas.
  - B. Then let roads through all dangerous areas be sealed.
  - C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.
    1. Were they disabled because of asbestosis?
    2. Were they hospitalized with asbestosis?
    3. Are they now suffering ill effects of their work environment?
      - a. Explain their ill effect, if any.
- II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.

III. Let rockhounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.

IV. Waver-of-Liability forms would be accepted by responsible rockhounds.

V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

A. Let rockhounds be permitted 24/7.

B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.

VI. Let the public lands with grazing rights leased to local ranchers be completely open for rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

VIII. Archeological or sites of historical significance should be viewable but protected from vandals.

A. This will include hieroglyphics, engravings, paintings, or other artifacts.

B. High fences, posting signs, and signs explaining the artifacts significance may be required.

IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA.

X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely,

Frank Mullaney

Rocky Five  
408-266-1791  
Cell:408-691-2656



Frank Nye  
<enginesonly@yahoo.com>  
03/05/2010 08:09 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject its A

Alternative A represents the 'No Action' alternative and would reaffirm current management under the 1984 Hollister RMP (as amended). BLM would incorporate new health risk information into public outreach and education asbestos hazard information program to mitigate public health risk.

#### Discussion

The NEPA 1502.14 (d) requires BLM to provide a No Action alternative. BLM has failed to provide a No Action alternative but instead has added conditions to the No Action Alternative.

#### Recommendation

Provide a No Action Alternative without conditions as required by NEPA.  
make it happen Frank E. Nye



Frank Nye  
<enginesonly@yahoo.com>  
03/05/2010 08:03 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject re open cc

My name is Frank E. Nye and I have been riding at clear creek for over 35 yrs along with many outhers and have 0 health issues, this bogas closure is a crime that must be corrected ..serve the people!!



"Frausto, Richard"  
<Richard.Frausto@avisbudget.com>

03/22/2010 10:12 AM

To "'cahormp@ca.blm.gov"' <cahormp@ca.blm.gov>

cc

bcc

Subject: Clear Creek Closure

San Jose, Ca. 95133

March 22, 2010

BLM  
Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

To Whom It May Concern -- an open letter to the BLM:

I am writing to express my concerns about the future of the Clear Creek Management Area, and in particular, public access of Clear Creek Road.

Since 1970 I have enjoyed my weekends and vacations spent at Clear Creek. Over these many years I have brought my family, as it grew to experience the primitive camping and teaching my children to ride. I remember the camp fires having with my friends and family enjoying just one facet of this great state of California.

The complete closure of Clear Creek has prevented any future plans of this type of recreation. It's all the more frustrating to hear that this is supposedly being done in my best interest, for a risk that is negligible considering the limited exposure, if it indeed exists at all. My risk from a collision with a vehicle on highway 25 exceeds any risk of exposure to the air at CCMA.

I hope that the BLM respond to the publics wishes to reopen the CCMA roads and trails in their entirety to all recreational users.

If not, to at least keep Clear Creek Road open to all vehicles traveling between New Idria and Coalinga Roads, including street legal motorcycles as a suggested compromise.

It is my sincere hope that all parties charged with this important decision base their findings in good scientific processes and truthfully apply the laws and regulations by which we live by.

Richard Frausto

Sincerely,

---

The sender believes that this E-mail and any attachments were free of any virus, worm, Trojan horse, and/or malicious code when sent. This message and

its attachments could have been infected during transmission. By reading the message and opening any attachments, the recipient accepts full responsibility for taking protective and remedial action about viruses and other defects. The sender's employer is not liable for any loss or damage arising in any way from this message or its attachments.



GARY LA HUE  
<lahueslatte@sbcglobal.net>  
02/09/2010 08:08 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

To whom it may concern,

I would like to urge you to keep Clear Creek open . It is a source of entertainment as well as a place to just hike picnic or go rock hounding. As a concerned citizen of the area, I would implore you to reverse the decision you have made, concerning this wonderful recreation area.

Respectfully, Gary R. LaHue



"George Alderson "  
<george7096@verizon.net>  
03/05/2010 06:29 AM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Comments re CCMA RMP/EIS

Mr. Rick Cooper, Field Manager  
BLM, Hollister Field Office  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister CA 95023  
[cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)

Dear Mr. Cooper:

This is a supplement to our comments submitted by email on March 3, 2010, about the CCMA draft RMP/EIS.

BLM may be exposed to litigation under the Federal Tort Claims Act and other pertinent laws if the final plan allows OHV riders to enter the asbestos ACEC. We did not see this issue mentioned in CCMA documents we have read.

OHV groups have urged BLM to reopen routes within the asbestos ACEC under Alternative A. If BLM does that, the agency would be encouraging visitors to enter lands where BLM knows they will be exposed to airborne asbestos fibers.

The risk assessment by US EPA establishes that excessive asbestos exposure may occur when ATV or dirt bike riders enter the area repeatedly and inhale dust raised by vehicles ahead of them. If a rider dies of asbestos-related illness 10 or 20 years later, will the survivors sue BLM for damages?

We trust that BLM has asked for guidance from the Solicitor. A failure to protect the public against the known asbestos hazard in the ACEC could expose BLM and the Department of the Interior to costly claims.

Please respond to this issue in the final RMP/EIS.

Sincerely,

George & Frances Alderson  
112 Hilton Avenue  
Baltimore, MD 21228  
E-mail: [george7096@verizon.net](mailto:george7096@verizon.net)  
Tel: 410-788-7096



"George Alderson "  
<george7096@verizon.net>  
03/03/2010 02:37 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA RMP/EIS comments

Mr. Rick Cooper, Field Manager  
BLM, Hollister Field Office  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister CA 95023  
[cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)

Dear Mr. Cooper:

Please accept our compliments on the draft plan and EIS for Clear Creek Management Area. I (George) take a personal interest in this area because my mother's family settled in this region of California before 1910, and several of my relatives live there still. I am retired from a career with BLM and US EPA.

Please convey our thanks to the authors of the draft for the cogent analysis of the resources of CCMA and the public uses of them, for the realistic series of alternatives presented, and for the thoughtful analysis of the environmental impacts of each alternative. We feel that the 90-day period allowed for comments has been adequate. Hollister Field Office made it easy to get the documents. You mailed us the CD version because we were on an earlier mailing list, and you responded promptly when we asked for a paper copy.

### **Background on OHVs**

BLM should not be intimidated by the barrage of criticism from OHV riders. The bureau has been through this before. I served in the BLM wilderness program at headquarters during the wilderness inventory in 1978-80, when OHV groups raised a royal stink and tried to block the bureau from carrying out its inventory in the California Desert Conservation Area. They sent in thousands of angry comment letters and even filed appeals with the Interior Board of Land Appeals, but the appeals were denied. To BLM's credit, over the past 30 years the areas open to OHVs in the CDCA have been greatly reduced. Nature has restored many abused acres, and public enjoyment of the desert has benefited.

A recent Forest Service decision could be a good model for BLM's final decision on Clear Creek. In October 2009 the Forest Service made a tough decision closing the Upper Tellico OHV trail system in the Nantahala National Forest, NC, because of severe erosion and sediment pollution of streams. As in the Clear Creek case, OHV groups responded with anger and insults. They submitted hundreds of letters and they hired an engineering firm to contest the Forest Service's analysis. However, that firm cherry-picked the most favorable data in a flimsy attempt to overcome the agency's conclusions.

The final decision by the Forest Service closed the OHV trails permanently. The appeals filed against that decision were denied in January 2010. OHV groups have talked about filing a lawsuit, but none has been filed yet. OHV fans who were irate about Tellico over the past 3 years have become quiet, and the controversy has died down. Forest Service documents on the Tellico case are posted at: <http://www.cs.unca.edu/nfsnc/nepa/tusquitee/tellico.htm>. An especially valuable document is the "Response to Comments," a 169-page document answering every argument raised by OHV groups. It would make good reading for BLM employees working on Clear Creek. The appeal decisions are posted at: [http://www.fs.fed.us/r8/appeals/decisions/2010\\_decisions/ncarolina/2010\\_rf\\_decisions\\_nc.htm](http://www.fs.fed.us/r8/appeals/decisions/2010_decisions/ncarolina/2010_rf_decisions_nc.htm) (see Nos. 17-21).

### **Bar OHVs from the Asbestos ACEC**

The analysis in the draft EIS demonstrates that the lands in the asbestos ACEC simply are not suitable for OHV recreation. The US EPA risk assessment shows that asbestos exposure exceeds acceptable levels. EPA found that dirt bikes and ATVs are the greatest problem because they raise a cloud of dust containing asbestos fibers, which are inhaled by riders and by other visitors. The most effective way to reduce asbestos exposure is to bar those vehicles.

EPA's sampling method correctly reflects the way OHVs are used in CCMA. Although OHV groups have objected to sampling from a vehicle following in the dust cloud behind another vehicle, it reflects what many riders do, as can be seen from photos posted by Clear Creek riders on their own web sites.

Even full-size OHVs such as Jeeps and ordinary automobiles can raise a dust cloud. In my travels on back roads all over the West, I've inhaled quite a bit of dust from cars ahead of me. (Thank goodness asbestos soils are rare.) On one popular Jeep route we saw dust a half-inch deep after a "Jeep jamboree" event had passed through. If full-size vehicles are to be allowed within the ACEC, they should be restricted to routes equipped with surfacing or dust-palliatives to prevent a dust cloud.

### **Benefits of excluding OHVs**

The exclusion of dirt bikes and ATVs from the ACEC will have several important benefits for the public interest. The asbestos hazard will be reduced to a minimum because vehicles will not be raising asbestos fibers into the atmosphere. The closure of obsolete OHV routes will lead to restoration of natural conditions, healing of eroded surfaces, and re-uniting fragmented blocks of wildlife and plant habitat. Without OHVs roaring everywhere, Clear Creek will become more attractive to visitors seeking a quiet place to enjoy nature, see the spring wildflowers, have a picnic, go bird watching, go rockhounding, or go hunting. All these potential public uses have been discouraged by the dominance of OHVs in Clear Creek.

We believe the highest value of lands in the ACEC is as natural wild lands, to serve the public as wildlife habitat, as watershed, and as a place for quiet forms of outdoor recreation. The serpentine area, which is also the asbestos hazard area, supports plant life specially adapted to the nutrient-poor serpentine substrate. Here in Maryland a 1,900-acre serpentine area has been acquired by the state as the Soldiers Delight Natural Environment Area. Horseback riding,

bicycling and OHVs are not allowed. However, no asbestos problem has been identified here. For information see: <http://www.dnr.state.md.us/publiclands/central/soldiers.html>

The area could also be valuable for the endangered California Condor. The condor was reintroduced in 2003 at Pinnacles National Monument to the north of CCMA, and a pair of condors were observed nesting in 2009 at a high rocky cliff on a private ranch outside PNM. We urge BLM to identify potential condor roosting and nesting habitat in the asbestos ACEC and seek advice from the Fish and Wildlife Service and other specialists as to the best management for this purpose.

### **Future access routes**

While we favor closure of the ACEC to all dirt bikes and ATVs, we suggest that a few routes for cars should be kept open for access to trailheads for bird watchers, rockhounds, botanists, and all who wish to enjoy the natural environment of this area on foot. We understand that California bird watchers may be submitting recommendations to BLM about specific access routes.

Only vehicles suitable for highway travel should be allowed, used for transportation to the trailheads – not any form of OHVs driven for the sake of adventurous driving. We do not favor the “scenic route” described in Alternative E, involving new construction of the Spanish Lake road to Wright Mountain. Instead, we favor recreation access routes leading in from the periphery of the ACEC to trailheads where visitors can enter foot trails into the wildland areas. Some of the former OHV routes could be suitable for conversion to foot trails, where they comply with Best Management Practices.

For wildlife and plants, it is desirable to have blocks of habitat where the center of the block is farther than 1 mile from the nearest route. For restoration of native wildlife habitat and potential habitat for the California Condor, BLM should provide uninterrupted larger blocks where passing OHVs will not disturb condors or other wildlife.

The route networks in Alternative A, B and C are far in excess of any need for access to enjoy the natural features of CCMA – many OHV routes would be less than a half-mile from the next route, and few places would be farther than 1 mile from the nearest route. Alternatives D and E are better for wildlife and plant habitat, but they may not provide enough access to trailheads for visitors entering the area on foot.

We encourage BLM to discuss reasonable trailhead access roads with groups representing nature watchers (birds, native plants, etc.) hikers, hunters, and rockhounds. In our view, the goal should be to maintain blocks of habitat larger than 1 mile across, to benefit the habitat and to escape the noise of passing vehicles. If there is a vehicle route every half mile, they are too close together.

### **Offroaders have other places to ride**

OHV riders have complained that if the ACEC is closed, too many riders would be concentrated on a smaller system of trails in other places. BLM should disregard this factor, because OHV riders have no inherent right to ride on publicly owned lands without crowding. If they have bought a vehicle for which there are few places to ride, they must accept the consequences.

The State of California operates eight state vehicular recreation areas. The counties run other sites as OHV parks. BLM operates the Jawbone area and several areas in the California Desert. Senator Dianne Feinstein recently introduced legislation (S. 2921) to give statutory sanction to five OHV recreation areas in the desert, namely El Mirage, Johnson Valley, Rasor, Spangler Hills, and Stoddard Valley.

If necessary, crowding can be managed by adopting a reservation/permit system, like those used by the National Park Service to manage river trips in the Grand Canyon and backcountry visitors in high-demand sites such as the canyons of Zion National Park and the high country of Yosemite National Park. The Forest Service sets "trailhead quotas" to prevent crowding in a number of sites in the High Sierra. (See Inyo National Forest's trailhead quotas page at: <http://www.fs.fed.us/r5/inyo/recreation/wild/quotas.shtml>) Crowding on OHV trails is no excuse for keeping an unsuitable area such as Clear Creek ACEC open to vehicles.

### **Budget considerations**

Others commenting on the draft plan and EIS have advocated many miles of routes for OHVs, without mentioning the budget implications. BLM has an obligation to conduct maintenance on every mile of vehicle route to comply with Best Management Practices (EIS, pages 643-647) to prevent erosion and prevent degradation of vegetative cover and wildlife habitat. In the ACEC there are extra costs because workers may be required to wear personal protective equipment and undergo decontamination after the work day. We should not ask any BLM employees to jeopardize their health by working on asbestos soils without full protective measures.

A network of 227 miles of OHV routes is described in Alternatives A and B, 185 miles in Alternative C. We doubt that BLM would have the budget to keep those large mileages up to BMP standards. A more modest system of access routes to trailheads would cost much less. The final decision should explain how BLM expects to pay for maintenance of the routes approved in that decision.

Finally, we thank the staff of the Hollister Field Office for the good work represented in the draft plan and EIS. Thank you for considering our views. Please keep us informed of further action.

Sincerely,

George and Frances Alderson  
112 Hilton Avenue  
Baltimore, MD 21228  
[george7096@verizon.net](mailto:george7096@verizon.net)



"Gerhard Donner"  
<gassinggerhard@surfnetc.com>

02/21/2010 06:14 PM

To <cahormp@ca.blm.gov>

cc

bcc

Subject Clear Creek BLM Draft RMP/EIS comment

Dear Sirs,

I'm very disappointed with the closing of Clear Creek. Instead of a two hour (one way) drive to Clear Creek, I'm now driving five and one half hours to Jawbone Canyon. Day trips are out of the question. Hollister Hills SVRA is far too congested. Metcalf is too small and is often closed. Stonyford and Cow Mountain are also too far away for day trips. I don't enjoy the terrain at Carnegie either.

After reviewing the BLM Draft RMP/EIS proposals, I think **Proposal A is the most desirable**. I've been going to Clear Creek since the late '70s and know many others who have done the same. Nobody, including the BLM or EPA, has been able to find anyone who has ever gotten sick from asbestos exposure at Clear Creek. I'd bet a million dollars that more people have gotten hurt traveling to and from Clear Creek than from any asbestos exposure there. Perhaps it would make more sense closing Coalinga/Los Gatos Rd.

This wouldn't be an issue if a suitable, immediate replacement of like size and terrain could be substituted for Clear Creek within a two hour driving radius. Fort Ord comes readily to mind. Isn't it being decommissioned from military use? They already have a race track and suitable infrastructure there.

I also think it's quite bogus that I'm reading that there is an unwillingness from the BLM to allow a thirty day extension on the Draft RMP/EIS comment period especially when it took the BLM an extra year to come up with the new Draft RMP/EIS.

Please don't make us dirt bike riders resort to desperate measures such as the possibility of riding/creating illegal trails or the instigation of class action lawsuits to re-open public land. Let's get Clear Creek re-opened ASAP.

Best Regards,  
Gary Donner



Glencjan@aol.com  
04/19/2010 03:44 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Comments on current Clear Creek draft plan


Dear BLM,

I would like to recommend that Option A, of the proposed Clear Creek plan, be the result of this review period. The land should be reopened as a OHV area with the continued policy of some dry season restrictions.

To provide a potential safer riding area option, the development of the Cantue Zone for additional OHV use would be a desirable.

The Clear Creek area has been know to be an Asbestos area well before it became a very popular OHV area. Automobile club maps I have seen from the 1960's and 1970's have the Clear Creek road labeled as an Asbestos Hazard. The use of back country areas always have some risk. Americans enjoy using their public lands for a variety of recreational uses that often put them in risk of life and limb. The function of government is to provide some basic services and protect our freedom. Government should provide information and let the people decide on what risk is acceptable to them. The idea that shutting down public land to protect the citizens makes as much sense as shutting down Yosemite National Park to protect us from rock falls, floods, lightning and falling from El Capitan etc. Far more lives are at risk in our National Parks than I found in any of the data found in the Draft Plan.

If government starts to measure every risk that the public could face in public lands I am afraid that this is the beginning of the end of outdoor recreation. **WE WILL ALL HAVE TO STAY HOME AND WATCH NATURE SHOWS ON CABLE TV. PLEASE KEEP OUR PUBLIC LANDS OPEN TO THE PUBLIC!**



Glen Chambers  
1022 Colusa Ave.  
Sunnyvale, CA 94085





"Glenn and Linda "  
<retrobiker@earthlink.net>  
01/20/2010 10:23 PM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Comments on Clear Creek Management

Hi,

I have not had any time to actually read the Clear Creek Management plan, but want to offer my comments.

The recent closure of the area is, to me, the worst management decision that could have been made. I do not believe we, the public, should be arbitrarily locked out of our public land because of a supposed but unproven health hazard. We, the public, should not have to prove that no hazard exists to get that area reopened. It should never have been closed in the first place unless you, the BLM, can unarguably and scientifically PROVE beyond any reasonable doubt that my health is significantly affected if I voluntarily choose to spend a couple of days there per year. Does that scientific proof exist? If not, then open that area immediately!

Thank you,  
Glenn Wegner  
10200 Hillcrest Rd  
Cupertino, CA 95014



gluhed@aol.com  
03/05/2010 05:00 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject ccma deis comment

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

**Comment #1**

**Subject: incompetent management**

**Discussion**

the blm hollister field office has continually shown complete disregard for taxpayer money or green sticker money, the public opinion, desire for accuracy, public trust in a government agency, or logic and facts concerning the ccma closure and risk. by refusing to have a peer group review any of the science, by refusing any information that does not suit the closure, by spending two years on this process without considering any source other than the epa, the blm has wasted countless hours and dollars.

**Recommendation**

the blm should remove and prosecute those responsible for the last two years of nonsense and see that this kind of wastefulness does not occur in the future, or at very least remove itself from the ccma and let a competent organization take over.

tom keith  
519 spring st  
redwood city ca  
94063



"Greg J Meade"  
<gjmeade@sbcglobal.net>  
12/10/2009 05:12 AM

To <cahormp@ca.blm.gov>  
cc <User501968@aol.com>, <rsreyes@mesaroad.com>,  
<webmaster@arra-access.com>  
bcc

Subject Clear Creek Management area

I am writing this letter in an effort to keep the Clear creek area open to Motorcycles and quads. In California, our recreation areas get smaller and smaller, but the amount of riders just keeps increasing. Funneling these tax and fee paying recreation enthusiasts into smaller riding areas creates more danger from head ons and over usage of the trail systems. We all know that this "reducing airborne asbestos emissions" is a cooked up LIE from some non-rider. If you are so worried about asbestos, put up a sign and let us ride, we all know one big windy day does more damage then a thousand riders can do in a year. If a person is worried about asbestos, they can wear a respirator, but don't close another area with this flimsy excuse. Thank You if you actually read and think about this letter, Greg J. Meade- Morro Bay, CA.



Greg Mirassou  
<gregmirassou@sbcglobal.net  
>

01/23/2010 02:05 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject ccma public comment

Please see the attached CCMA comment.



To whom it may concern.CCMA comments.doc



Gus Meyner  
<gmeyner@gmail.com>  
03/05/2010 04:32 PM

To cahornp@ca.blm.gov  
cc  
bcc  
Subject Substantive Comment regarding the November 2009, Clear  
Creek Management Area Draft Resource  
Management Plan & Draft Environmental Impact Statement

March 5, 2010

Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

Dear BLM:

Please accept the follow Substantive Comment:

Subject: Erroneous content

Discussion: Throughout the document the material of concern is defined as "asbestos". Asbestos is a manufactured product and does not occur naturally. There is no 'asbestos' in the CCMA. In the Executive summary alone, the word "asbestos" is used sixteen (16) times. The material related to asbestos that is present in CCMA is chrysotile, which has different properties and effects on human health than asbestos. Not only is this erroneous subject of investigation inapplicable, the use of the word "asbestos" is politically misused to create hysteria and an invalid description of the conditions that exist at CCMA.

Recommendation: Remove all content that is relevant to asbestos and not chrysotile.

Gus Meyner  
927 MacDuff Court  
San Jose California 95127  
[gmeyner@gmail.com](mailto:gmeyner@gmail.com)

CORVA, AMA, Blue Ribbon Coalition, Bayarearidersforum, South Bay Riders



Heather Kilby  
<heatherakilby@yahoo.com>  
03/04/2010 11:46 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

To Whom It May Concern :

My wife and I wish to express our adamant opposition to the closure of Clear Creek. We support Alternative A. We feel that if cost is an issue, the Bureau of Land Management should charge entrance fees. If asbestos is an issue, those same individuals should be required to sign waivers upon paid admission. We respectfully urge you to support Alternative A, and thank you for your leadership.

Sincerely,

Gabe and Heather Kilby



"home"  
<mleconstruction@aol.com>  
03/08/2010 02:11 PM

To <Rick\_Cooper@ca.blm.gov>  
cc <mleconstruction@aol.com>  
bcc

Subject Clear Creek

I just wanted to take a moment to let you know that I am completely displeased with your handling of the CCMA. I feel that you and a few well connected and wealthy folks have taken it upon yourselves to push your agendas upon the majority. The CCMA was once a fun beautiful fully sustainable trail system for all recreationist. It had access for all, including disabled. This land is for the people and you are trying to keep it from the people. I think that rock hounding, mountain biking, dirt biking, hunting, hoarse backing, and hiking are all excellent ways to see this land and I know they can all do so on the existing trail system. I want the no action plan A action taken. I feel your office has ripped the OHV trust fund off by taking monies set aside for OHV and using it to close us out of our own lands. Building decontamination stations that cant possibly work. There has never been a single case of cancer attributed to CCMA recreation caused by chrysotile, Or from the actuall mine workers or families and they saw exposures that no recreationists would see. I know you have a difficult job but I don't think you are doing the job that you are supposed to do, I think you are supposed to represent the people not just yourself or your radical minority environmental groups who have set traps to harm and or kill recreationists. We support the environment but also feel that a park such as CCMA can and has been sustainably used for generations. I want My comments added to the record. I would also like to see a full accounting of all letters submitted for public comment so I may see for myself if you and the BLM are truly representing The People or yourselves. Thank you for your time, and please choose option A  
Michael Lee Evans



husley7374@aol.com  
03/05/2010 03:42 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Comments



Submitted on behalf of Mr. Steve Hlebo Clear Creek Comments Steve Hlebo.doc



husley7374@aol.com  
03/05/2010 02:30 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 7



Exhibit A.pdf



Exhibit C.pdf



Exhibit B.pdf



CCMA\_Comment\_7.doc



husley7374@aol.com  
03/05/2010 02:26 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 6



CCMA\_Comment\_6.doc



Exhibit C.pdf



Exhibit B.pdf



Exhibit A.pdf



husley7374@aol.com  
03/05/2010 02:25 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 5



CCMA\_Comment\_5.doc



Exhibit A.pdf



Exhibit B.pdf



Exhibit C.pdf



husley7374@aol.com  
03/05/2010 02:23 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 4



CCMA\_Comment\_4.doc



Exhibit A.pdf



Exhibit B.pdf



Exhibit C.pdf



husley7374@aol.com  
03/05/2010 02:17 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA Comment # 9 Part 2 of 2



Exhibit J.pdf



husley7374@aol.com  
03/05/2010 02:16 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA Comment # 9 Part 1 of 2



CCMA\_Comment\_9.pdf



Exhibit\_H.pdf



Exhibit I.pdf



husley7374@aol.com  
03/05/2010 02:15 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DEIS DRMP Comment # 12 Part 2 of 2



Exhibit J.pdf



husley7374@aol.com  
03/05/2010 02:14 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 12 Part 1 of 2



CCMA\_Comment\_12.pdf



Exhibit\_H.pdf



Exhibit I.pdf



husley7374@aol.com  
03/05/2010 02:13 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 11 Part 2 of 2



Exhibit J.pdf



husley7374@aol.com  
03/05/2010 02:11 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA Comment # 11 Part 1 of 2



CCMA\_Comment\_11.pdf



Exhibit\_H.pdf



Exhibit I.pdf



husley7374@aol.com  
03/05/2010 02:10 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 15



CCMA\_Comment\_15.pdf



Exhibit\_H.pdf



Exhibit\_E.pdf



Exhibit F.pdf



husley7374@aol.com  
03/05/2010 02:08 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 10 Part 2 of 2



Exhibit J.pdf



husley7374@aol.com  
03/05/2010 02:07 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 10 Part 1 of 2



CCMA\_Comment\_10.pdf



Exhibit\_H.pdf



Exhibit I.pdf



husley7374@aol.com  
03/05/2010 10:38 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comment # 20



CCMA\_Comment\_20.doc



Exhibit A.pdf



husley7374@aol.com  
03/05/2010 10:26 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP DEIS Comments #3



CCMA\_Comment\_3.doc



Exhibit A.pdf



Exhibit B.pdf



Exhibit C.pdf



husley7374@aol.com  
03/05/2010 10:25 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA Comments #2



CCMA\_Comment\_\_2.doc



Exhibit A.pdf



Exhibit B.pdf



Exhibit C.pdf



husley7374@aol.com  
03/05/2010 10:13 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek DRMP/DEIS Comment #1



CCMA\_Comment\_1.doc



Exhibit A.pdf



Exhibit B.pdf



Exhibit C.pdf



ian plaine  
<ianplaine@pacbell.net>  
02/26/2010 11:48 AM

To BLM <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/EIS Comment

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

Subject: Incorrect Statement

Referring to the Following Paragraph on Page 1:

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. **The result of the study concluded that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found increased long-term cancer risk from engaging in many of the typical recreational activities at CCMA.**  
Discussion:

The 2008 EPA report concluded that only under specific activities and conditions did the exposure to carcinogens exceed the lifetime cancer risk. Many "Typical" recreational activities allowed adults and children multiple yearly visits before exceeding the threshold for lifetime cancer risk.  
Recommendation:

The Draft EIS needs to be edited to remove the bold statement references as it is false .

Ian Plaine

21 Rio Del Ct.  
Danville CA, 94526



ian plaine  
<ianplaine@pacbell.net>  
02/26/2010 11:47 AM

To BLM <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DRMP/EIS Comment

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

Subject: Erroneous Statement

Referring to the Following Paragraph on Page 4:

The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides significant new information that **must** be incorporated into a land use plan to evaluate the public health risk associated with BLM land use authorizations.

Discussion:

The Code of Federal Regulations does not state that all new information "must" be included in an RMP/EIS.

Recommendation:

The DRMP/EIS needs to be edited such the bold "must" mentioned above is replaced by a non mandatory term such as "should" or "can".

Ian Plaine

21 Rio Del Ct.  
Danville CA, 94526



ian plaine  
<ianplaine@pacbell.net>  
02/26/2010 11:45 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DRMP/EIS Comment

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

Subject: 2008 EPA Document References

Referring to the Following Paragraphs:

The Federal government has concluded that all forms of asbestos are hazardous to humans , and that all can cause cancer; **although the chrysotile form may be less potent than amphibole family** in causing mesothelioma.

Thus, in 2004, as part of the process of evaluating the Atlas Mine cleanup for possible delisting of the site from the federal Superfund list, EPA Region 9 initiated an asbestos exposure and human health risk assessment for the CCMA to measure the amount of NOA fibers in the personal air space by conducting typical recreational activities in the CCMA **using up-to-date equipment and methodology.**

While chrysotile asbestos was the predominant asbestos mineral type found in the EPA air samples, almost 8% of the PCME fibers were identifies as tremolite, actinolite, or another amphibole asbestos mineral. There is an **emerging consensus in the scientific community** that amphibole asbestos may present and even greater health risk .

Discussion:

In above paragraphs specifically bolded statements, the federal government including the EPA and BLM admit to the need for the most "up-to-date" methods for asbestos risk assessment. The 2008 EPA document referenced throughout the CCMA DRMP/EIS did not use bin specific analysis of asbestos fibers which would separately account chrysotile from other asbestos fibers . Thus the admitted lower risk chrysotile which makes up 94% of the serpentine ACEC asbestos fibers was not correctly accounted for and the human health risks would actually be much lower .

Recommendation:

Remove all statements in the CCMA DRMP/EIS which refer to the 2008 EPA CCMA document with regard to asbestos concentrations including human inhalation amounts .



Ian Plaine

21 Rio Del Ct.  
Danville CA, 94526





iorpete@att.net  
01/11/2010 10:29 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Draft Plan

Dear sir / mam,

I am writing to voice my support in re opening Clear Creek to OHV use. OHV land is shrinking everyday while it's popularity grows. This makes the areas that remain over crowded leading to dangerous situations and more difficult maintenance challenges.

Instead of closing OHV land we should be working on creating more oppportunity for mixed use so that famillies can enjoy this together.

Thank you,  
Peter Giusti  
Novato, CA



**J vreeke**  
<jvreeke@gmail.com>  
12/09/2009 02:26 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear creek

I am in support of opening up the entire clear creek area for offroad vehical enjoyment as it was. There are many dangers in this world and the excuse of asbestos is a sham and an effort to take away land from the public.  
Jim Vreeke



**JAKE MEYER**  
<mcs4jake@msn.com>  
03/02/2010 09:21 AM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek Management Area

Hi

In regards to the Clear Creek Management Area Closure. I as a motorcycle shop owner and family motorcycle rider strongly oppose the closing of this recreation riding area. We need places such as this for our industry along for out young children and youths. The jobs lost in the state of California alone is rising directly from the fact that Your Organizations are striping the desire of new buyers,current owners, of sales, service and repairs due to the fact Californians have NO local places to enjoy anymore. This is WRONG make a stand for the "blue collar" back bone of this state!!!! Keep this open, support our communities motorcycle business and our job force. Its clean by this state of current depression more harm than good is being done.

Thanks Jake Meyer  
Voting Tax Payer

---

Hotmail: Free, trusted and rich email service. [Get it now.](#)



JEAN SCHRUM  
<jeanschrum@att.net>  
03/05/2010 08:29 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject CLEAR CREEK DRAFT IMPACT STATEMENT OPINION

I have given this great thought & have a lot of ideas & opinions & have studied your A through G [Comparison of impacts to Recreation Resources ]draft. There is the economic impact in these times of prolonged economic distress & ensuing stress, the need for a place to be able to go in a tank of gas to pursue one's choice of recreation & stress reduction for oneself & ones family & friends. This area is not only diverse but close proximity to the huge population of the San Francisco Bay Area.. We have treasures in our National Parks in California but they are touristy [ expensive]. & crowded. The three gateway cities to get to Clear Creek are Coalinga off the I-5 ;Hollister & King City off the 101. All cities could use the money from visitors in the form of gas, food, ice,motels, other services & people deciding to explore the area further for more frequent & longer stays giving a boost to the economy & provide jobs.for the local economy.One only has to look at all the news sources national & local to see the escalating anger and rebellion against all ' government' now erupting into killings, not just protests. America has always been the land where we agree to disagree but now violence is not only happening all the time but more frightening is the ' accepted way of the times' attitude; it is a sickness that need to stop & people need a place to heal & seek relief from the horrific stresses of our times. The BLM has a unique opportunity to provide the citizens & visitors with an outlet of diversity for all pursuits of recreation, defuse a big segment of society stress with all that Clear Creek offers while giving the local economy a boost. I know your excuse is asbesiosis but not only is that something that has been presented as a warning health hazzard but we can & do have the right to say we have been informed & therefore it is with informed consent that we all chose to go to all areas of Clear Creek knowing the risks involved. The risk of being killed by road rage or being shot as a drive by is escalating very rapidly & the effects are immediate re the 20 to 30 plus yeat wait for asbestosis to be a diagnosis . Also precedent has been set by the sheriff & police & fire dept, when they ask[ tell] people to leave from immediate danger ie fire, flood, rock & mud slide & they defy orders they sign a waver. My opinion is reopen Clear Creek Recreational area to Hiking, Hunting, Rockhounding, Firearms & Target shooting, Camping & staging in the whole area & some areas for the OHV people. This is where I found the answer that backs up my response/ request and I quote. The BLM is responsible for stewardship of our public lands. The BLM is COMMITED to manage, protect & IMPROVE these lands in a manner to SERVE THE NEEDS OF THE AMERICAN PEOPLE. Management is based upon the principles of MULTIPLE USE & sustained yield of our nations resources within a framework of environmental responsibility and scientific technology. These resources include RECREATION, RANGELANDS, TIMBER, MINERALS, watershead, fish & wildlife habitat, WILDERNESS AIR & SCENIC QUALITY AS WELL AS scientific & Cultural values [ I capatilized the criteria I feel Clear Creek has to offer] Hopefully you are all familiar with this;, as it is your job description your Mission Statement as government

employees of , WE, THE PEOPLE of the UNITED STATES of AMERICA.

Thank you as I am anxious to pursue my recreational activities of rockhounding & just being on the mountain in Clear Creek soon.

Jean Schrum R.N.

283 Grant Street

Coalinga, CA,93210 [ CELL 602-300-3629] EMAIL [jeanschrum@att.net](mailto:jeanschrum@att.net) US citizen, who loves this fantastically beautiful country & especially the collective public lands set aside for all times for ALL people.



"Jeff Holmbeck "  
<jeff.holmbeck@sbcglobal.net  
>

04/19/2010 11:58 PM

To <cahormp@ca.blm.gov>

cc

bcc

Subject Comments to Draft RMP/EIS for CCMA

Mr. Cooper, Mr. Murphy,

As an OHV enthusiast (and father of 2 kids) - you have plenty of comments from many OHV constituencies outlining the flaws in your draft RMP for CCMA and I don't need to add to them here ( but I support all the noted flaws that have been pointed out).

My only comment is that you omitted one other Alternative - and that is to reopen CCMA year-round.

Comment #1: Please add as Alternative A+ (or however you want to designate it) into the draft RMP a statement that allows for CCMA to be opened year-round to all users.

Sincerely,

Jeff Holmbeck  
3054 Aspen Drive  
Santa Clara, CA 95051



"Jeff & Kathleen Jacobsen "  
<jak3488@suddenlink.net>

03/03/2010 06:15 PM

To <cahormp@ca.blm.gov>

cc

bcc

Subject Clear Creek/Uvas Dam

Ca. BLM, I have been going to this area since 1965. Since that time I have Hill Climbed, Flat Tracked, and participated in Moto Cross. This area was chosen by us because at that time nobody cared what we did there. It was an AMA sanctioned Rack Track. That track kept myself and buddies off the street and out of trouble. If you people who control the PUBLIC'S LAND keep it up there will be no place for kids and their families to recreate with ATV'S and Motorcycles. It will become the private property of Enviro-Mentalists. Make the right decision and at the same time help our economy along by allowing Clear Creek to be used as it was intended. Sincerely, Jeff Jacobsen 707-768-3544 Member of AMA, BRC, Stewarts of Liberty, and a taxpaying citizen for the last 45 years.



"Jeff & Kathleen Jacobsen "  
<jak3488@suddenlink.net>  
02/26/2010 02:16 PM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Clear Creek/ Enough is Enough!!!

Date: 2/26/2010

Hollister BLM  
Rick Cooper  
Bureau of Land Management, Hollister Field Office  
20 Hamilton Court  
Hollister, CA-95023  
cahormp@ca.blm.gov

Re: Comments on Clear Creek DEIS

Dear Mr.Rick Cooper,

The DEIS does not contain any Economic Effects of the huge impact to regional economy like gas stations, restaurants, lodging, camping supplies, etc. This must be added to the DEIS with supporting documentation.

Why during the worst economic downturn in California History does the government fly off the handle because some college student had it brought up in a freshman environmental studies class. Between Fed, State, County, and city regulations being put into effect by #1 WQCB, and the AQCB at the State level and now the Feds what do you want everybody to do. There aren't enough street corners to sell shoes on and even then most of the street corners are a haven for Drug sales.

The Environmental Study for Clear Creek Management Area failed to take into account the many studies showing Chrysotile should not be grouped in with other types of asbestos fibers when looking at potential carcinogenic properties.

Sincerely,

Jeff Jacobsen  
P.O. Box 489  
Hydesville CA 95547  
707-768-3544



Jeffrey R  
<jjeffrey\_r@hotmail.com>  
03/05/2010 12:39 PM

To <jim\_abbott@blm.gov>  
cc  
bcc

Subject Comments on Clear Creek DEIS, BLM closure unjustified

Dear Mr. Abbott,

The report filed by the BLM is based on an EPA study originating from mostly theoretical analysis of potential asbestos exposure hazards. Yet, despite 50 or more years of use, there have been no documented cases of any asbestos related health problems, correlated with recreational exposure at Clear Creek. The BLM and EPA must not reference reports/studies that are clearly not supported by actual and verifiable health cases at Clear Creek. It is an absolute fact that there are no cases of illness associated with the use of the CCMA.

OHV recreation has clearly been the predominant activity by past visitors at the Clear Creek Management Area over the last several decades. Sadly, the BLM's preferred alternative selection, makes no provisions for OHV use at all. This represents a complete reversal of the current and historical use in the CCMA. Selection of a preferred alternative must include at least SOME OHV use provisions. Preferably, selection criteria would give emphasis to public travel on trails and roads as opposed to eliminating it completely.

Vast acreages of BLM land directly adjacent to the Clear Creek Management Area, suitable for OHV recreation, could potentially be opened. Omission of such an alternative in the DEIS completely ignores the thousands of users who are crying out for a suitable place to recreate responsibly in their chosen pastime.

It is virtually impossible to travel in the CCMA without some form of motorized transportation. The terrain is rugged and forbidding with numerous elevation changes. Due to health issues, many users would effectively be locked-out of access, without a provision for motorized travel. Public lands administered by the BLM, must remain accessible to all users, especially those who are unable to hike/walk for hours on end. Rock hunting, camping, bird watching, etc., would be impossible for disabled or otherwise "less than fit" members of the public, without motorized access. OHV use, especially quad, jeep or dirt bike, leaves the smallest footprint, especially when that use is restricted to established trails/roads. Horse back riding is simply not practical for most people, considering the cost, difficulty and strenuous nature of climbing aboard a large animal. Concern for our disabled veterans, elderly, obese and chronically ill members of the public must be represented in the BLM's choice of preferred alternatives. Anything less, is a form of discrimination.

Sincerely,

Jeff Robeson  
15087 Stratford Dr.  
San Jose CA 95124

---

Hotmail: Trusted email with powerful SPAM protection. [Sign up now.](#)



Joe Ferrante  
<joeferrante@sbcglobal.net>  
03/03/2010 09:36 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

Sir:

Recently I just celebrated my 68th birthday. For 35 of those years, I have been riding at Clear Creek and to this date have not suffered any complications from asbestos related diseases/complications. Another friend, 75 years old, has been riding there over 50 years!! No illness and or symptoms of mesothelioma.

We have outlived your 30 year predictions of the potential hazards and remain living witnesses to the erroneous assumptions/conclusions presented by the studies conducted by "government Representatives".

For decades, Clear Creek has been a source of great pleasure to tens of thousands of off-road enthusiast comprised of all walks of life. These same thousands also contributed to the local business community thru their purchases of gas, camping equipment, food, drinks, etc.

Also, many of those thousands of riders are now restricted to riding in a small park south of Hollister, which you know creates additional stress on the park.

This is a great opportunity for the government to display it's claim to be the "servants-of-the-people" and re-open Clear Creek.

Regards,

Joe Ferrante  
3713 Benton St.  
Santa Clara, CA 95051  
joeferrante@sbcglobal.net



John Culver  
<jmdove47@yahoo.com>  
02/18/2010 12:30 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Permanent Closure--a concerned citizen

Attn: CCMA RMP/EIS

I am greatly saddened and angered to learn that the Federal government, at the behest of a lawsuit from environmentalists, has decided to permanently close the Clear Creek area to pretty much anything of value including mineral collecting. This flies completely in the face of more than 100 hundred years of precedent regarding the human use of the entire area! This decision is a ridiculous decision, an outrageous decision, a decision that is socialist/Green Party/Progressive in its agenda!

This is NOT a park where talking about. It is land that has been used by humans for a long time AND NOT AS A PARK! THAT IS THE PURPOSE OF THE BLM--TO NOT BE A PARK! IT SHOULD STAY THAT WAY! As for mineral collecting, which I have done from boyhood, what do you think will happen to the rocks in the area? Let me clue you in: They will disintegrate eventually, due to erosion and flood tumbling and become sand. This means all the beautiful jade and plasma quartz will NOT be there for us to enjoy anymore. As for the endangered species: A dry year, common in California, and a single lightning strike could render your concerns non-existent from the resulting wildfires! At least with OHV use you can temporarily close it during the dry season.

Finally, I am sick and tired of the government trying to protect me from things I don't need protecting from. I am, as a college educated citizen, well aware of the potential health impact of asbestos/serpentine soils. Does that mean your going to close most of the northern coast of California too? Pretty much all serpentine has asbestos embedded within it. You guys need to back off and let ME decide whether I am willing to take the SMALL risk of being in the area, during the wet season, for a few hours of collecting minerals.

As for hiking: Few of the yuppie progressives in the San Fran area are going to bother coming down to such a hard core wilderness area. They'll all be too scared of the asbestos not to mention the Valley Fever mold.

Sincerely,  
John M. Culver  
Math Teacher, Rock Hound, and Concerned Citizen  
Fresno, CA



John Wilkinson  
<johnfw1@mac.com>  
03/03/2010 04:56 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DEIS

The DEIS is very long and difficult. The rationale for the choice of alternatives is not clear to me. I have long been interested in the wilderness potential of the Joaquin Rocks area, and also in the possibilities for quiet recreation that would be available in the serpentine ACEC if it were not overrun with dirt bikers, and I am glad to see recognition of the value of such recreation. But I would hate to see restrictions on access to the area on the main roads, as appears to be contemplated under all of alternatives D-G. It appears that elimination of off-road activity in the serpentine area would address most of the health problems from asbestos without having to limit the number of visits per year by hikers, rock-hounds, birders, botanists, and others.

I am not unalterably opposed to the possibility of opening up other OHV routes in the CCMA, but alternative D could open up OHV routes closer to the Joaquin Rocks than the former road closure at Wright Mountain. I am violently opposed to any such new routes. Since the possible routes are not defined in the DEIS, if this alternative were to be adopted, we might be faced with new routes that would be subject only to an EA. This is not acceptable. I think it might have been possible to formulate other alternatives; it is difficult or impossible to tell from the draft document.

I would therefore request that the comment period on the DEIS be extended for another 90 days, which I believe is also what some of the organized OHV groups are asking for.

John Wilkinson  
408-876-8295  
johnfw1@mac.com



Jons4x4@aol.com  
02/24/2010 04:52 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

Dear Sir,

I have been visiting the Clear Creek area since 1973, and would hate to see it closed.

1. It is an important area for OHV travel, with the net loss of other areas when OHV use is growing
2. I think the danger of the asbestos in the area is overblown out of all the people I know no one has had any problems because of this area.
3. This area has some unique minerals found nowhere else.
4. All the work that volunteers have done over the last 30 years to keep this area open would be for nothing!

Thank You,  
Jon Aichele

Jon Aichele  
3801 Phaffle Dr.  
Bakersfield, Ca 93309  
[jons4x4@aol.com](mailto:jons4x4@aol.com)  
Pn. 661-832-9453



Joseph Rooney  
<ikerooney@yahoo.com>  
01/21/2010 12:02 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Management Area Public Comments

Hello Folks,

The drop-in box had been removed to your car by the time I made it to the front desk this evening at the Santa Clara Convention Center.

Regretfully, I arrived after the principles said their piece, but I surmised from the public comments afterwards that they disagreed with the validity, accuracy and honesty of the study upon which the environmental (draft) statement was crafted.

I tend to agree that there are motives that may have swayed the study judging by the outright pathos and hyperbola alluded to off highway vehicle activity.

There have been, what I call disinterested groups, meddling with the Clear Creek Recreational assets and public access to those assets. First evidenced by calling to fact that the rarity of the milk vetch in the Clear Creek area. That milk-vetch is a noxious weed to some, more commonly referred to as loco weed.

Then only having succeeded in closing down a small portion, another "disinterested" group identified and sued in court over the hazardous naturally occurring material asbestos along with identified mercury mines in the area and I believe, calling parts a superfund cleanup..

That type of asbestos, to the best of my knowledge occurs throughout California and if hazardous to health, would prompt the state to erect "Prop 65" warnings at a bewildering density in cities and suburbs and countries. I believe other respiratory ailments such as silicosis occur at rates far higher than that assigned ailments identified with chrysotile inhalation.

That being said, I believe folks that wish to tour that area, down wind of that area, or nearby areas

should have to sign lifetime liability releases. But that could easily expand into all California residents and visitors also having to sign lifetime liability releases due to the uncertain nature of all the compounds that are floating about in our quite clean air.

Clear Creek should have never been closed, partially closed or sections reserved for plants that are not in peril of extinction.

Please open Clear Creek to off highway vehicles.

Thank you,

Joe Rooney

936 Kiely Blvd Unit C

Santa Clara, CA 95051-5018



"jrhill" <jrhill1@4xtreme.org>  
01/12/2010 09:29 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek Draft Comments

January 12th, 2010  
9:18PM

Draft Managers,

At this conjecture in time I am absolutely dismayed. What you are proposing to do in the Clear Creek region with road closures affects not only myself but countless children, elderly, and infirmed. Many of us feel as though our government has "rolled" on us.

Have you forgotten that many local families tried in vain to keep the Union Carbide Company out of this area when they announced their intention to mine asbestos? They (including members of my mothers family who were members of the Fawn Lake Deer Hunting Club) petitioned government to prevent what they knew would one day destroy the Clear Creek Watershed. Those men and women who served during WWII were well aware of the dangers associated with asbestos witnessing first hand ailments suffered by dock workers who handled the material. Our government officials pretended to be ignorant of these facts and allowed a large mining compnay to come in and open up the asbestos deposits near Clear Creek. You see, our government desired this mineral for military and aerospace applications more than it cared for its citizenry. Asbestos clouds wafted over the region despite guarentees that this would not occur. Now you turn around and try to blame off roaders and rock hounds for a problem YOU created! Nice try but I am not buying your feigned ignorance nor your bullying.

Here is the bottom line. Your recomendations are too restrictive. Only the healthiest of Americans would be able to continue the passtime of rockhounding in this region. As I eluded to before, children, elderly, and infirmed would have no reasonable access. Even I would have difficulty (at age 55) hiking in from New Idria especially if I had to return to my vehicle the same day, and I used to run marathon! Rock hounding is strenuous and requires a great deal of searching- as opposed to a simple "walk in" and "walk out." Your bureau is not being realistic!

Contained within the Clear Creek Unit are WORLD CLASS collecting opportunities (Neptunite/Benitoite). Gem and mineral varieties found nowhere else in our state also exist here. Plasma agate would be an example of what I am referring to and what I have seen of the unique Clear Creek jadite found by members of the San Luis Obispo and Santa Maria Rock and Gem Clubs over the years is truly special! We can't simply run over to some place else and find material like this.

Many of us middle aged rockhounds who have sat at the feet of of the old timers when we were first getting our own feet wet in the hobby believe that there still exists plenty of potential for completely new discoveries in this region. This will never happen if you continue to "lock us out" with suffocating laws, rules, and regulations. My Congressman, Wally Herger, continues to fight for multiple use classifications on Federal lands and he sends me updates regularly. Your spirit is not one of cooperation with the citizenry to find REAL SOLUTIONS but seems to me to be doing whatever it is that you intended to do in the first place, regardless! We the people, do not seem to matter! Quit playing into the hands of the well funded and powerful environmentalist lobbys and allow the minority groups like rock hounds to have a share in land use.

Please consider giving us access (even if it is seasonal) to our beloved (sacred to many) rock collecting areas and permitting overnight use in areas deemed safe (there are areas where exposure is less). Remember that during the winter and early spring months asbestos movement is minimal (because of cohesion when the soil is wet).

Commercial operations for Benitoite need to have the least restrictions as possible. I personally abhor the practice of "bringing material out to be screened." Americans deserve the right to see the actual strata material comes from first hand, how it is mined, and extract the material

THEMSELVES from the tailings or fresh ore provided by mine owners! "Knott's Berry Farm" off location mining is an insult to rock and gem enthusiasts. You are lucky to have a business out there. Locally where I live, in this topsy-turvy economy, businesses are closing up right and left....not that you care about the economy.

While I cannot attend any of the posted meetings due to a minute by minute family medical situation up in Oregon requiring me to be able to "drop everything and travel north," I really wish that I could. Hopefully enough individuals will show up or at least respond by mail or email so that we ALL can reach some sort of accord.

Despite what you might first be tempted to believe, rockhounds (and many off road enthusiasts) are more environmental than you would think. No, we are not going to align ourselves with most of the environmental groups due to their extremist views but a majority of us are CONSERVATIONISTS at heart. Every time I go out in the field I witness "environmentalists" enjoying nature but why is it that I am almost always the ONLY PERSON PICKING UP GARBAGE and PACKING TRASH OUT? What I am suggesting here is that you have plenty of room to negotiate with us and many strengths to build upon. Let's forge an agreement that we all can live with and be happy!

Gerald and Grace Hill, Jr.  
9702 Deree Rd.  
Live Oak, CA. 95953  
[jrhill1@4xtreme.org](mailto:jrhill1@4xtreme.org)  
(530) 695-1595



Judy Burson  
<jburson496@gmail.com>  
03/05/2010 12:59 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Closure

Prior to the Bureau of Land Management (BLM) closing this area, they estimated that 78,000 people used this land annually for hunting, camping, rock and gem collecting, off-road recreation, hiking/backpacking, and other recreational activities. This area is also home to our State rock, serpentine; and our State gem, Benitoite. There are more than 40 other gems and minerals in the CCMA that have been collected by Rockhounds. The CCMA is the only place in the world where gem quality Benitoite and Fresnoite can be found. There have also been commercial mining operations, including a current Benitoite gem mine, within the CCMA.

After attending the BLM's public hearing on January 13, 2010 in Coalinga, more questions were raised than answered regarding the rationale for closing the CCMA.

I have spent days researching why the CCMA was closed and I understand that there MAY be a potential health risk, however, now that we have been informed, I would like to exercise my right as American citizen to make an informed choice to use our public lands. I would be agreeable to usage fees and restrictions on access depending on weather. At most, access could necessitate the signing of waivers which acknowledge the potential harmful effects; releasing liability of county, state, federal agencies.

The BLM closed this area in May, 2008 in response to one (1) EPA asbestos exposure evaluation study. There has been no reported study of asbestos related diseases of miners who worked in the asbestos mines within the CCMA prior to their closure in the 1980's. For decades, hundreds of employees worked the various asbestos mines within the CCMA. No mention of a case study of these employees was made in EPA's report. Was a study completed? If not, why?

An independent study conducted by Geologist E.J. Fowkes, PhD. and Archaeologist Ray Iddings in June of 2008 states that "...initial observations, pending formal mineralogical analysis, clearly suggest that the EPA's sampling route was highly misrepresentative of the vast majority of the New Idria (former mine within the CCMA) serpentine, and probably more representative of the commercial complex that supported 150 years of mining activity and the naturally occurring contact zones from which these mineable minerals were taken." The report goes on to state that "naturally occurring asbestiform amphibole was not found. However, historic ore processing equipment was found to contain potential asbestiform amphibole that had been imported into the area for commercial purposes." Their study found that the only potentially hazardous asbestos found was in the equipment imported to the area, i.e. pipe installation.

The conclusion of another report published by 2004 Sage Publications, "Coalinga Chrysotile: A short Fibre, Amphibole Free, Chrysotile: Part V – Lack of Amphibole Asbestos Contamination", states "Direct analytical studies using the most sensitive methods, conducted over almost 50

years, have failed to find amphibole asbestos in Coalinga chrysotile. Further evidence that Coalinga chrysotile does not contain amphibole asbestos comes from human observations of workforces that mined and milled this material and of populations living on and near the ore body. To date, there has not been any evidence of an attributable excess of pleural plaques or mesothelioma in any of these individuals. Since pleural plaques and mesothelioma are causally associated with exposure to amphibole asbestos, their absence is therefore also consistent with the view that Coalinga chrysotile is not contaminated by asbestiform amphibole.”  
[Www.1800mesothelioma.com/asbestos-detail.htm](http://www.1800mesothelioma.com/asbestos-detail.htm) defines the different types of asbestos and defines the chrysotile type found in the CCMA as the least harmful.

So many of the references found regarding the chrysotile (aka: white, curly fiber, and short fiber)” asbestos, as found in the CCMA, indicates that it poses a minimal health risk. As an adult citizen, I have experienced warnings from the government on the dangers of mercury in the fish, tobacco in cigarettes, alcohol use, etc. Yet, with all the studies to show that these may be harmful, they have not been banned. The government has warned that tobacco causes cancer, however they allow us to make the choice to smoke or not. Why is this any different? I feel this is a socially acceptable risk, and that I should be allowed to decide if I want to take it or not. Although we do not have lobbyists like the tobacco industry, let us have the right to make our own choice when it comes to asbestos exposure in the Clear Creek Recreation Area; do not take away my right to make an informed decision!

Also, are society should be encouraging family activities more that ever, so limiting access to people 18 is not acceptable.

As more and more public land is being closed, more and more people are being forced into smaller areas, which then negatively impacts those areas. Then those areas are closed. This is a lose/lose for everyone.

Judy Burson  
496 S. Hachman St.  
Coalinga, CA 93210  
559-935-0981



Justin Hunter  
<justinmotorhead1@gmail.com>

03/06/2010 05:30 PM

To cahormp@ca.blm.gov

cc

bcc

Subject Open up Clear Creek

Please, I grew up riding there, I know 80 year old men who rode all there life's at Clear Creek that are perfectly healthy. If it is legal to smoke a cigarette, then it should be my choice if Clear Creek is unhealthy to me. Obviously somebody just wants this place closed, they have tried many times for other reasons without success. Now they have finally found one that is working for them, so they will go full bore with it. Please let us ride motorcycles there, we are truly running out of places to ride. I had to buy a bike for the street, because the dirt is disappearing.

Sincerely, Justin Hunter



"J. Braun"  
<xl600v@gmail.com>  
03/03/2010 01:40 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Comments on Clear Creek Management Area Draft RMP/EIS

Once again I am writing in response to a proposed land closure that will prevent family recreation on public lands.

The Clear Creek land closure seems to be based on bad science and short sighted management. Even the BLM admits that no known case of health injury has occurred in the years of OHV use in the Clear Creek area. What is the greater risk, families riding motorcycles and atv's together, or kids sitting home playing Grand Theft Auto or World of Warcraft in front of a computer screen?

I won't belabor the point with a form letter, rather I will just say this:

I support the No Action Alternative that restores historic OHV use on up to 270 miles of routes and approximately 450 acres of barrens. Permitted OHV events should be allowed.

If some small health risk is identified by a new risk assessment or a review of the EPA's 2008 report, the BLM should use signs and educational outreach as a way to inform the public rather than closing this important OHV area on a permanent basis.

Thank You,

J. Braun

--

J. Braun

Amston CT USA

xl600v <at> gmail <dot> com

Speed is not a four letter word!



"J. Braun"  
<braunj@qddev.com>

03/03/2010 01:38 PM

Please respond to  
braunj@qddev.com

To cahormp@ca.blm.gov

cc

bcc

Subject Comments on Clear Creek Management Area Draft RMP/EIS

Once again I am writing in response to a proposed land closure that will prevent family recreation on public lands.

The Clear Creek land closure seems to be based on bad science and short sighted management. Even the BLM admits that no known case of health injury has occurred in the years of OHV use in the Clear Creek area. What is the greater risk, families riding motorcycles and atv's together, or kids sitting home playing Grand Theft Auto or World of Warcraft in front of a computer screen?

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If some small health risk is identified by a new risk assessment or a review of the EPA's 2008 report, the BLM should use signs and educational outreach as a way to inform the public rather than closing this important OHV area on a permanent basis.

Thank You,

J. Braun  
Amston, CT 06231

braunj@qddev.com  
781-424-1159

Deadlines Matter!



"J.L Mangono"  
<jltwo1@yahoo.com>  
04/02/2010 11:56 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject RE OPEN CLEER CREEK

To Whom It May Concern,

My name is JL Mangono, I am a firefighter/emt in San Juan Bautista where i currently live and I have been riding @ Clear Creek since I was born. My father has been riding there since he was a child and his father use to hunt there as well. The closure of the area has made a huge negitive impact at other ohv parks due to overcrowding and has made a huge negative economic impact. There was NO PUBLIC DUE PROCESS in the closure. The EPA has said they did not close the area the BLM did. If there is a deadly amount of asbestos then show us the # of people with cancer directly from Clear Creek. People have known the risk for years and still ride out there so why fight it or close it down Make Liability Forms Be Signed at the entrance and its a win win situation. PLEASE REOPEN THE LAND



karen  
<karenkls@ix.netcom.com>  
02/06/2010 03:02 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Comments on BLM Clear Creek Draft Plan-Correction

From what you offer in the BLM Clear Creek Draft Plan I would favor Alternative A.

But I do not think that is the way to go, **please start over**. Let's go back to the way it was forty years ago. Tear down the fences, open the area up; it should be an open area not limited to the few trails and roads that you have proposed.

I have been going there for the last forty five years and no one I know or have I heard of any has experienced negative health effects from their activities at Clear Creek.

Thank you for the opportunity to comment on this important issue.

Joe Sprenger

1413 Blackstone Ave  
San Jose CA 95118  
408-265-7987



"Karen Murphy"  
<murphyland@redshift.com>  
03/03/2010 01:53 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA/RMP



Attached letter outlines our suggestions for Clear Creek. Thank you. Concerning\_BLM\_RMP letter.doc



Kathi Peverini  
<kathi@peverini.com>  
03/03/2010 11:41 AM

To blm <cahornp@ca.blm.gov>  
cc  
bcc  
Subject CLEAR CREEK RECREATION AREA

Dear BLM

As a long time rock hound I have frequently visited the Clear Creek area without feeling any threat from the asbestos. I assume all responsibility when I enter the area. The sign age relieves you of any responsibility.

KEEP THE AREA OPEN!!!!

Ted Peverini



Kathleen Joyce  
<kjoyce9999@yahoo.com>  
02/02/2010 02:27 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Management Plan-Please resume mineral  
collecting

Hello,

I hope rock hunters will still be able to collect minerals at the Clear Creek in San Benito County. The danger of asbestos is mostly for dirt-bikers, and not mineral collectors.

Sincerely,

Kathleen Joyce

797 Bush St  
SF CA 94108



Kathleen McGann  
<colleen.mcgann@sbcglobal.net>

03/05/2010 08:25 AM

To cahormp@ca.blm.gov

cc Colleen McGann <colleen.mcgann@hds.com>

bcc

Subject LMCreek RMP/EIS

Dear BLM,

I am writing in favor of re-opening Clear Creek for all activities. I have enjoyed 20 plus years rockhounding in this park and already miss weekend trips to the area. The geology of the area and the many new minerals that have been identified in Clear Creek are tremendous importance to the scientific community globally. There are no cases of mine workers or BLM personnel ever having physical difficulties because of the asbestos. Please strongly consider re-opening the park for our enjoyment again.

I have attended the meetings and read your documents and was not impressed with the EPA study as it was not done using data as the park is actually utilized. For this reason and the many more that are constantly brought to your attention, please open Clear Creek.

MY VOTE IS TO RE-OPEN CLEAR CREEK FOR PUBLIC USE AGAIN AS IT SHOULD BE.

Sincerely,

Kathleen McGann  
Past President of California Federation of Mineral Societies  
President of Peninsula Gem & Geology Society  
Director of North Bay Field Trips  
Always a Student of Geology and Earth Sciences  
769 Alvarado Avenue  
Sunnyvale, CA 94085



Kathryn  
Hardy/CASO/CA/BLM/DOI  
03/17/2010 12:04 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: California Land Closure

Kathy Hardy  
Central California District Manager  
California State Office, W-1623  
2800 Cottage Way  
Sacramento, CA 95825  
(916) 978-4626  
Cell: (916) 662-5364  
email: kathryn\_hardy@blm.gov

--- Forwarded by Kathryn Hardy/CASO/CA/BLM/DOI on 03/17/2010 12:04 PM ----  
Karen Sprenger <karenkis@ix.netcom.com>

02/20/2010 10:50 AM

To Kathryn\_Hardy@blm.gov  
cc  
Subject California Land Closure

TO: President Obama, Senator Boxer, Senator Feinstein, Rep Lofgren,  
Gov Schwarzenegger

Subject; California Land Closure-Clear Creek Management Area

Please, we need you help on what the BLM is doing in California.  
They are trying to close the Clear Creek Management Area (public  
land), keep us for using our land. Please review what they are  
doing. Please assure that they are following all the required  
procedures.

The public has asked for an extension to the review of the BLM plan,  
the extension was denied. Why? Is this fair? Please review what is  
going on.

Example:

One reason for the closure is health concerns. The requirements are  
that the Environmental Impact Statements shall be concise, clear, and  
to the point, and shall be supported by evidence that agencies have  
made the necessary environmental analyses. The BLM has not met the  
"necessary environmental analyses" to show there is any human risk.

Joe Sprenger  
1413 Blackstone Ave  
San Jose, CA 95118  
408-265-7987

CC

Rick Cooper, Hollister Field Office Manager,  
rick\_cooper@ca.blm.gov Fax: (831) 630-5055

Kathy Hardy, Central District Manager, Kathryn\_Hardy@blm.gov Fax:  
(916) 978-4657

Jim Abbott, Acting California State Director, Jim\_Abbott@blm.gov  
Fax: (916) 978-4416

Robert Abbey, Head of the Bureau of Land Management,  
Robert\_Abbey@blm.gov Fax: (202) 208-5242



**Kathryn  
Hardy/CASO/CA/BLM/DOI**  
03/17/2010 12:00 PM

To [cahornp@ca.blm.gov](mailto:cahornp@ca.blm.gov)  
cc  
bcc  
Subject **Fw: Clear Creek Management Area**

**Kathy Hardy**  
Central California District Manager  
California State Office, W-1623  
2800 Cottage Way  
Sacramento, CA 95825  
(916) 978-4626  
Cell: (916) 662-5364  
email: [kathryn\\_hardy@blm.gov](mailto:kathryn_hardy@blm.gov)

----- Forwarded by Kathryn Hardy/CASO/CA/BLM/DOI on 03/17/2010 12:00 PM -----  
**David Seghi <[dseghidc@sbcglobal.net](mailto:dseghidc@sbcglobal.net)>**

02/25/2010 07:17 AM

To [Kathryn\\_Hardy@blm.gov](mailto:Kathryn_Hardy@blm.gov)  
cc  
Subject **Clear Creek Management Area**

I am writing this letter to ask that you look into the actions involving the Clear Creek Management Area closure.

[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area.html)

Many people and families have enjoyed this area for camping, rock-hounding and OHV recreation for many decades, I have been since 1980. Even back then there was talk of OHV use being eliminated from this area by anti OHV groups for no other reason than they don't like OHV's. In previous public meetings the public opinions seem to have fallen on deaf ears. It appears that the powers that be have had their minds made up long ago and are just going through the necessary formalities required to carry out their personal wishes.

Today the CCMA is closed off to everyone due to the decision by the BLM Hollister, Ca. office, particularly Rick Cooper, based on their opinion that an EPA study suggests that there exists potential harm from natural occurring asbestos found there. No single study in and of itself is conclusive. Asbestos is a man made product that uses naturally occurring minerals such as chrysotile

in the process, chrysotile is only one of the minerals that can be used . The environmental study for Clear Creek Management Area failed to take into account the many studies showing chrysotile should not be grouped in with other types of asbestos fibers when looking at potential carcinogenic properties. This study contradicts a study performed by Stanford University in the 1970's, which essentially concluded that the potential harm to humans was extremely remote. Not all forms of minerals used to make asbestos have been found to be harmful. These minerals occur naturally through out the state of California. If the potential harm found in CCMA was real, then one would expect to find cases related to asbestos caused harm in the hospital and medical records of people who have recreated, worked and lived in the area. You would also expect to find a general awareness on the potential harm in the local population. People have been living, ranching, mining, and recreating in this area for more than 100 years.

Asbestos exposure becomes a health concern when high concentrations of asbestos fibers are inhaled over a long time period (<http://www.hhs.gov/news/press/2001pres/20010916a.html>). People who become ill from inhaling asbestos are often those who are exposed on a day-to-day basis in a job where they worked directly with asbestos and/or in the manufacturing of asbestos. Actual health risks could be much lower than those estimated in the CCMA assessment since the recreation area dosen't have the same exposure times as the studied occupational examples. The DEIS must consider the uncertainty rather than using worst case scenarios.

The decision to close the area appears to one from fear of litigation and/or an example of the how far the extreme environmentalists will go to eliminate OHV use.

There are bad apples in every batch and no group, organization or agency is immune. Most OHV users and outdoor recreationists are respectful and responsible people who enjoy the great outdoors that the people of the U.S.A. have accessible to them. Unfortunately access to public land is being systematically taken away from the public by our government.

With liberty comes responsibility and accountability.

Sincerely, Dave Seghi



Kathy Woveris  
<woveris@yahoo.com>  
03/04/2010 11:52 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject clear creek area

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that uses science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the **only** alternative that we prefer along with these following recommendations:

- I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Crystotile asbestos.\*
  - A. Let the study "precisely delineate" all dangerous asbestos areas.
  - B. Let roads through all dangerous areas be sealed.
  - C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.
    1. Were they disabled because of asbestosis?
    2. Were they hospitalized with asbestosis?
    3. Are they now suffering ill effects of their work environment?
      - a. Explain their ill effect, if any.
  - II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.
  - III. Let rockhounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.  
\*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.
  - IV. Waver-of-Liability forms may be acceptable for rockhounds.
  - V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.
    - A. Let rockhounds be permitted 24/7.
    - B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.
  - VI. Let the public lands with grazing rights leased to local ranchers be completely open for

rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

VIII. Archeological or sites of historical significance should be viewable but protected from vandals.

A. This will include hieroglyphics, engravings, paintings, or other artifacts.

B. High fences, posting signs, and signs explaining the artifacts significance may be required.

IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA.

X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely,

Kathy Woveris

"It often seems to me that the night is much more alive and richly colored than the day."

Vincent van Gogh



"Keith, Tori"  
<Tori.Keith@fire.ca.gov>  
02/24/2010 10:05 AM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek Management area

Please do not close the Clear Creek area off from the public. It is a beautiful area with a lot to offer the public. It has multiple uses for recreation and enjoyment for all ages. If the area needs to be managed, then manage it. Closing it totally off would be a shame. If there is too much dust being created by certain use, manage that specific use. Don't close it off to all use just because there is a problem in one or two. My husband and I have spent time in the area and enjoyed it very much. We are looking forward to spending more time in the future.

Tori Keith  
4692 Usona Rd  
Mariposa, CA  
95338  
209-966-4447



ken arrington  
<crf450dust@yahoo.com>  
04/04/2010 01:09 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject clear creek

Hello, My family mostly rides down in Hollister- but I have some friends that love to ride at Clear Creek but they say they can't ride there due to closure, please try to keep it open because riding places are becoming harder to find that are convenient and close to our houses, my family and I travel all the way from napa to hollister which is pretty far, thanks and please provide more recreational places for the public



"Ken Stillwa"  
<kstillwa@san.rr.com>  
04/16/2010 08:20 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Comment on Clear Creek Draft Plan

Bureau of Land Management,

My friends and I had been hunting deer, pigs and turkey at the Clear Creek area for the 15 years before the May 2008 closure. We are concerned that we might not be able to access our favorite hunting spots that we access from many points along R002. We access these areas by driving our 4-wheel drive vehicle up the R002 with our windows closed. If vehicles are no longer allowed to drive up that road then we will not be able to hunt that area. None of us own ATV vehicles and we are all too old to be walking up that road. It is enough of a workout to hike from the R002 road to access our hunting area. It would not be practical to be carrying game that we killed by walking the extra distance up and down the R002 road to Jade Mill Campground.

We would like to see BLM leave the 3 mile section of R002 above Jade Mill Campground open to vehicles. An alternate access to the BLM land south east of Tucker Mountain would be great, although that could take years to get a willing landowner to coordinate that with BLM.

Yours truly,

Ken Stillwaggon



Kenney Glaspie  
<kenneydglaspie@yahoo.com>

03/05/2010 10:53 AM

To cahormp@ca.blm.gov

cc

bcc

Subject comments to Draft RMP/EIS

Please find enclosed my attached comments to your Draft RMP/EIS for the Clear Creek Management Area



Substantive 1.doc



substantive 2.doc



substantive 3.doc



kennydeeg@comcast.net  
03/05/2010 02:45 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA DEIS ALT "D"

Alt. "D" is a viable option. The DEIS does not adequately analyze this alternative due to "no public access" but, New Idria Road goes very close to the Tucker area and Los Gatos Rd already provides access to Condon. Developing new staging/camping areas inside the CCMA but outside the ACEC is a viable option that would cost less money than locating, studying and developing another OHV area.

Thank You

Ken Deeg  
Timekeepers MC, FOCCMA, AMA-D36, BRC  
2415 Crystal Dr  
Santa Clara Ca. 95051



**KENT SUNDGREN**  
<pkswork@yahoo.com>  
01/09/2010 11:16 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Comments Clear Creek Draft plans

We need more access and more miles of trails for multiple use, not less for motorized users. It's time to realize we all own public lands, not just hikers.

All decisions must be made for the most common good as defined as most use by all in a shared managed area. Closing trails to certain type of users is not management, its laziness and giving in to PC.

Respectfully,  
Kent Sundgren

American born, tax paying, voting, and responsible motorized recreationalist.



"Kevin and Cindy "  
<greaterlove1@verizon.net>  
03/05/2010 03:49 PM

To <cahormp@ca.blm.gov>  
cc <exodusinnovations@yahoo.com>  
bcc  
Subject CCMA DRMP/DEIS Comments

**Dear BLM Personnel,**

**Attached are my comments for the Clear Creek Management Area DRMP/DEIS. Please review the document and incorporate changes as needed. If you have any questions or need additional information, please reply.**

**Thank you for your time,**



**Kevin P. Murphy** CCMA Substantive Comments.pdf



kingndi@aol.com  
12/09/2009 07:23 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

Hello,

I would like to make it clear that I oppose closing Clear Creek to OHV, specifically off-road motorcycles. I have ridden there for years, and the "asbestos" (actually serpentine) has never been a health problem.

I demand that you re-open Clear Creek to OHV enthusiasts. It is one of the few motorized recreation areas left in CA.

Thanks,

Steve Ritchie



Kris Rowe  
<lapidary.specialties@gmail.com>  
03/04/2010 01:37 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Re: CCMA RMP/EIS Comments

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

*(Please withhold my address from public review or disclosure by FOIA request.  
Thank you.)*

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that uses science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We have discussed this and we have come the conclusion that "Alternative A" is the only alternative that we prefer along with these following recommendations:

I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Crystotile asbestos.\*

A. Let the study "precisely delineate" all dangerous asbestos areas.

B. Let roads through all dangerous areas be sealed.

C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.

1. Were they disabled because of asbestosis?

2. Were they hospitalized with asbestosis?

3. Are they now suffering ill effects of their work environment?

a. Explain their ill effect, if any.

II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.

III. Let rockhounds make the choice. They have read the reports and understand the risks.

Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.

\*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.

IV. Waiver-of-Liability forms may be acceptable for rockhounds.

V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

A. Let rockhounds be permitted 24/7.

B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.

VI. Let the public lands with grazing rights leased to local ranchers be completely open for rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

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B. High fences, posting signs, and signs explaining the artifacts significance may be required.

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X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely,

Kris Rowe

Laura Okeson

1130 E. Everett Ave.

Fresno, California

93720



kristin kearns  
<kearnsfamily5@att.net>  
03/06/2010 07:47 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject family traditions

For thirty years now my family and close friends have used Clear Creek as a gathering spot for reunions, birthdays and camping, not to mention the incredible terrain for our hobby of motorcycle riding. These times have been interrupted, and are terribly missed. Please open Clear Creek, there has to be a compromise. Sincerely Will Kearns



Ladd Johnson  
<ladd\_johnson@yahoo.com>  
01/23/2010 10:04 AM

To cahormp@ca.blm.gov  
cc Bill Hanson <bill.hanson@kinetics.net>, Chris Pena  
<Chris.Pena@lamresearch.com>, John Alexander  
<flyinga250@yahoo.com>, John lariviere  
<lariviere.john@gmail.com>, Kieth  
<euphonioussixstring@yahoo.com>, Matt Ward  
<matt@uaudio.com>, Roy Obrecht  
<roy@datacenterconsultants.com>, Scotty Douglas  
<scotty@sccecc.org>, Tom Romano  
<tom.romano@lamrc.com>, TRomano  
<romanot2005@earthlink.net>, Vincent Rondas  
<trackadaptor@att.net>

bcc

Subject Attn: CCMA RMP/EIS

Dear BLM,

I'm writing in response to the BLM's CCMA RMP/EIS proposal.

Closing CCMA (and now Carnegie!!!) is wrong and is proof of BLM's, EPA's, and extreme environmentalist's bias and hatred of the off road community. Over the past 17 years I've lived in the South Bay, I've seen a steady attack on the activity I love and I'm sick of it. It started with the stupid green sticker/ red sticker law, then the closure of CCMA, ban on youth ATVs, and now the threat of closure of Carnegie. Enough is Enough!!!

The facts are out there that chrysotile asbestos is harmless to humans. Scientific journals such as The New England Journal of Medicine, International Journal of Health and Research by Taylor and Francis, and Review Article: Indoor and Built Environment by E.B. Ligren has proved that chrysotile asbestos is harmless to humans. The facts about CCMA chrysotile asbestos are:

- No asbestosis or mesothelioma has ever been associated with CCMA exposure
- Scientific studies show that chrysotile asbestos is harmless
- Mesothelioma is an extremely rare diseases
- There is no natural amphibole asbestos danger in the CCMA
- The EPA study focused on historic sites contaminated with imported asbestos

Need I remind you that the EPA is also responsible for environmental disasters like mandating the reformulation of gasoline that caused MTBE to poison our drinking water and caused millions if not billions of dollars to replace gas station storage tanks? The EPA was also responsible for the reformulation of diesel fuel that destroyed thousands of engines and put the hard hit trucking industry under further financial strain a few years back. Simply because they did not test the reformulated fuels compatibility with fuel injection o-rings was irresponsible and shows the lack of good judgment of the EPA. Further proof is the fiasco of the head of CARB Hein T. Tran's phony PhD that shows that bad science by fake scientist has caused more harm than good to this great country.

Also, the closure of CCMA (and likely now Carnegie) has caused further crowding of Hollister Hills and Metcalf. I've seen more accidents caused by crowded conditions recently. It is a rare day when you don't see an ambulance blaring (or helicopter) away headed to some down rider because of a head on with another rider, or because of the poor trail conditions caused with over use. I personally know of a young rider who recently broke his neck and is paralyzed from the neck down. He wanted to be an astronaut after he graduated from college. Now he sentenced to his wheelchair where he can't even feed

himself. Supposedly the EPA is saving us from asbestos by closing CCMA, but instead the EPA is making trail conditions more dangerous caused by overcrowding. What's the saying: the road to hell is paved with good intentions?

I challenge the BLM to prove me wrong about my belief that they are an organization that hates the off road community and is spineless to stand up to the EPA and their bad science. Option A of the CCMA RMP/EIS report is the only option: OPEN UP CCMA TO THE PUBLIC NOW!!!

Regards,  
Ladd Johnson



Laura Okeson  
<dreamer1954@sbcglobal.net  
>

03/04/2010 11:46 AM

To cahormp@ca.blm.gov

cc

bcc

Subject Serious Letter To The BLM

## Letter to BLM

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that uses science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the **only** alternative that we prefer along with these following recommendations:

I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Crystotile asbestos.\*

A. Let the study "precisely delineate" all dangerous asbestos areas.

B. Let roads through all dangerous areas be sealed.

C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.

1. Were they disabled because of asbestosis?

2. Were they hospitalized with asbestosis?

3. Are they now suffering ill effects of their work environment?

a. Explain their ill effect, if any.

- II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.
- III. Let rockhounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.

\*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.

IV. Waver-of-Liability forms may be acceptable for rockhounds.

V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

A. Let rockhounds be permitted 24/7.

B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.

VI. Let the public lands with grazing rights leased to local ranchers be completely open for rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

VIII. Archeological or sites of historical significance should be viewable but protected from vandals.

A. This will include hieroglyphics, engravings, paintings, or other artifacts.

B. High fences, posting signs, and signs explaining the artifacts significance may be required.

IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA.

X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely, Laura Okeson 1130 E. Everett Ave. Fresno, CA 93720



lee bates  
<bateslee@eburg.com>  
04/07/2010 10:02 AM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Closing Clear Creek Area

Dear sirs,

Do not close the Clear Creek area in CA. Your job is to serve to public and not impeded our recreational activities.

As a club We are a non-profit organization dedicated to the education of the public, specifically:

"To create, develop and encourage a general interest in and appreciation of the earth sciences and all allied subjects." (Articles of Incorporation) and to: "...disseminate knowledge of mineralogy and the earth sciences... and to encourage study in these subjects through means of ...field trips for exploration, study and collecting of specimens..." (By-Laws)

We feel we have a very legitimate claim for our continued access to the CCMA and would oppose any restriction therein as hampering our ability to fulfill our mission on behalf of all the people California as described above. We consider the CCMA to be one of the premier gem and mineral areas in the country. It is the only area in the world where gem quality benitoite gemstones and specimens may be found, and is the locality of discovery of a significant number of unique minerals.

Without access by knowledgeable people to explore and study this area, it is very likely that other unknown and potentially important minerals will remain undiscovered. We have a particular interest in the Benitoite Gem Mine and the jade and agate collecting areas located along Clear Creek and the Clear Creek Road. We have also visited many of the other mines in the area including many of the abandoned mines in search of gem material and collectable minerals. Areas that are available for gem and mineral collecting and discovery are drastically shrinking - everywhere. The loss of so many collecting and study areas to urbanization and set asides for parklands or other use make it imperative to do everything reasonable to keep important and otherwise remote areas like the CCMA open and accessible to responsible and well informed individuals and organizations in pursuit of knowledge that benefits all people for all time.

We question many of the base assumptions and are very much concerned with the approach used in your draft environmental statement (DEIS) wherein you consider all types of naturally occurring asbestos as being of equal health risk, when there is growing evidence that such is not the case, and those risks being based on occupational health studies involving manufacturing of and manufactured asbestos products. We do not think, as it has not been demonstrated, that all serpentine soils exhibit the same toxicity as assumed in your consideration of alternatives, and we do not believe the occupational health studies you cite are applicable to the very limited exposures that might be encountered during our occasional studies within the CCMA. We also note the DEIS fails to identify or cite any actual case where an individual has contracted any of the negative health conditions specified as the cause for alarm for which this exercise is undertaken. There are at least 20 different serpentine soil types within the CCMA with varying amounts of the various types of asbestos. A more comprehensive soil survey is needed to determine the amount of the various asbestos types

to be found in the various serpentine soils. There are approximately 1,000,000 acres of serpentine soil areas throughout California spanning 44 of the 58 counties. Serpentine soils are known to occur in 19 states beyond California. A broad brush approach of lumping all serpentine soils as presenting an equal health hazard when considering alternatives for dealing with naturally occurring airborne asbestos, in our view, it is not an acceptable approach from a human or practicable standpoint when considering management alternatives by a land management agency. If you close the CCMA, will you do the same with all serpentine soil areas? By what criteria will you make exceptions?

Please listen to us - the public you serve.

Lee Bates  
bateslee@eburg.com



Leza Rodriguez  
<xlminer@yahoo.com>  
03/08/2010 11:17 PM

To cahornp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Closure

As someone who grew up in the New Idria Mining District and has mined gems and minerals from the region for over forty years, I feel you are doing a great injustice to all the future generations of hikers, bird lovers, nature lovers, rock-hounds and outdoor enthusiasts who cherish and absolutely love that area. If liability is the issue, have people sign away their right to find the government liable. Geologically the New Idria Mining District is a very unique area in fact nothing else quite like it exists except in the Ural Mountains.

Face it guys California is full of Asbestos, there are some great sites in the bay area, that has far better long fiber than anything found in Clear Creek.

Leza Junnila



"Linda Anderson "  
<lindaba@wildblue.net>  
03/03/2010 01:34 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA comments

---

from Linda B. Anderson  
42801 Los Gatos Rd  
Coalinga CA



Hard copy in the mail. BLM CCMA.doc



<lookforjack@yahoo.com>  
12/10/2009 01:53 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Keeping clear creek closed forever

To whom this may concern,

As a person that used the area once or twice a year for about 3 years. I do not feel my health as been effected. But since the BLM seems bent on closing the area forever a compromise should be in order. Instead of the government givith the government taketh-away. Why not open an new area that does not impose a health risk? Instead of just saying you can't ride clear creek anymore? Oh and it's for your own health concerns.

I find this closer very offensive. Letting the EPA run around with sniffers on ATV's seems to not be a real world test.

If there was gold or oil in the area you would stop anyone from using it. But since its for fun its not worth saving.

So there are air borne asbestos fibers. Instead of closing it how about riders using resperator requirement? I saw the pictures of the EPA guy where one when he was sniffing the area on that ATV.

Has there been any evidence of anyone having health problems that used the area for recreational use? Why don't you pole the users of the area first and see how many of them have health problems that could relate to the use of the area?

Why is it that closing the area to people who use it seems to be the only solutions to federal land use issues?

Jack Sontag  
Manteca CA



Luvscolor2@wmconnect.com  
03/02/2010 05:40 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fwd: Response to Bolsa Proposal

Sirs:

I am resending this email as it came back today as being "undeliverable, server unknown". Please confirm receipt of this email....It must be delivered by tomorrow, March 3 .

\Mark L. Ward</HTML>

----- Message from Luvscolor2@wmconnect.com on Tue, 2 Mar 2010 13:37:48 EST -----

**To:** cahormp@ca.blm.org  
**Subject:** Response to Bolsa Proposal

Enclosed is an email copy of the letter I sent a few days ago, and you should have received it by now.

Mark L. Ward</HTML>



BLM letter 2.22.10.doc



**"Maloney, Marty"**  
<mmaloney@slocity.org>  
03/15/2010 11:12 AM

To <cahormp@ca.blm.gov>  
cc "Goulet, Daniel" <dgoulet@slocity.org>  
bcc  
Subject clear creek

I strongly believe that Clear Creek should be reopened for off-road use . The areas that pose a health risk due to asbestos should be marked as in the past and users beware . Most off road users do not use the area once late spring or summer has started due to dust and high heat. Thank you for the chance to comment .

Martin Maloney  
Atascadero , Ca



Marcia Gibbs  
<margconsult@gmail.com>  
04/05/2010 09:40 PM

To sbcsuper@supervisor.co.san-benito.ca.us  
cc cahormp@ca.blm.gov  
bcc  
Subject Re-Open Clear Creek Public Roads

Margie Barrios, District #1  
Anthony Botelho, District #2  
Pat Loe, District #3; Vice-Chair  
Reb Monaco, District #4; Chair  
Jaime De La Cruz, District #5

Board of Supervisors  
San Benito County  
481 Fourth Street  
Hollister, CA

***Mission Statement*** *The County Board of Supervisors will recognize the public trust it holds, will on all occasions conduct business with honesty, integrity, and respect for the individual, and will hold the organization of County government to that same standard.*

AFTERNOON SESSION 1:30 P.M.

**PLANNING DEPARTMENT - A. Henriques:**

24) Review staff report, and draft comment letter to the Bureau of Land Management Clear Creek Environmental Impact Statement (EIS) and provide comments and direction to staff.

**PUBLIC WORKS DEPARTMENT –**

**CCMA RMP/EIS STATUS UPDATE**

As permitted by the 45-day BLM extension, I wish to have this comment included in the Public Comments for the Clear Creek Management Area Draft Resource Management Plan and EIS.

I strongly advocate that each of you vote to open ALL County Roads in the Clear Creek Management Area at the meeting on April 6, 2010. These are public roads and should be re-opened for use as such. Please vote YES to

re-open these roads. Public lands in California are used and enjoyed by a broad cross-section of residents and we appreciate your careful and thoughtful consideration in favor of this request.

Thank you,

Marcia Gibbs  
Los Altos, CA  
Santa Clara County



**Mark Isaacs**  
<isaacsmark@hotmail.com>  
03/03/2010 03:03 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek Closure

I have been following the controversy regarding the proposed BLM closure of the Clear Creek area and would like to add my comments. I have been to this area several times to visit the Benitoite Gem Mine. I understand the desire of the BLM to protect the public from dangerous asbestos exposure, but I also feel that occasional visits in closed vehicles that are unlikely to allow significant exposure to air-borne particles should not be banned. I also feel that the public should be allowed to make decisions for themselves in this matter after receiving appropriate and accurate warnings regarding relative risk. Total closure of the entire area for all public use strikes me as an over-reaction to a minor health hazard.

Mark Isaacs, M.D.  
Oakland, CA

---

Your E-mail and More On-the-Go. Get Windows Live Hotmail Free. [Sign up now.](#)



markgigas@aol.com  
03/05/2010 01:06 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Comments on Clear Creek Management Area Draft RMP/EIS

Attn: Planning Coordinator;

Hello, my Name is Mark Gigas. I am both a member of the Ventura County Motorcycle Club and an Certified Industrial Hygienist whom happens to be credentialed with the State of California as an Asbestos Consultant professional. I have reviewed the Clear Creek EIS on the impact of the naturally occurring asbestos.

I have never ridden my motorcycle at Clear Creek. With the current situation, I will never have a chance to enjoy this area, known to be one of the best motorcycling areas in the country. I currently enjoy occasional motorized use on BLM lands.

With over 9 million dollars of OHV trust fund monies have been granted to manage the Clear Creek Management Area, where did the funds go? I do not accept complete closure of such a large historic area just because asbestos is located in the region.

Asbestos is common, so common in fact , it is our state mineral. With riding occurring in the CC area for over 60 years, why has there been no evidence of health damage if this area and crysotile asbestos is so dangerous?

In my opinion, the 2008 EPA CCMA Asbestos Exposure is a flawed study that needs to address additional available information. The human risk analysis is based on flawed assumptions. This study needs more real information utilized to be of any verifiable importance.

I support the NO ACTION ALTERNATIVE

Thank You,

Mark Gigas, C.I.H., Masters of Public Health, California Asbestos Consutant #96-1929



maryhicks@comcast.net  
03/03/2010 10:50 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Open access to Clear Creek

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

March 2, 2010

I visited the Clear Creek area beginning in the 1970's to collect rocks and minerals. The area has unique geologic interest and mineral collecting should be allowed.

This area has much to offer for photographers of nature. The landscape is fantastic. I have been waiting to have access to use my new digital camera.

There are many ways to mitigate known health risks and these can be as simple as paving roads in risk areas. Education on how to access the area and minimize dust exposure should be done. I have been negatively impacted by the current access restriction to the area. I look forward to being able to once again, explore and enjoy the Clear Creek area.

Please open access to the Clear Creek area.

Sincerely,

Mary Hicks  
2418 Larkin Court  
Antioch, California 94531  
(925)779-0698



"Meyner, Gus"  
<GMeyner@trane.com>  
04/16/2010 12:43 PM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA DEIS/ RMP Comment

**Subject: Invalid statement**

The paragraph entitled "Waivers of Liability and Indemnification of Risk" on page 352 says:  
"Therefore, the potential for waivers of liability or indemnification of risk as 'stand-alone' mitigation measures for human health and safety do not satisfy the purpose and need for the CCMA RMP/EIS."

**Discussion:**

"Protection of human health and the environment" is not a goal listed in the Purpose and Need required by 40 C.F.R. § 1502.13, and in accordance is not a mission of the BLM, and it therefore cannot be one of the management objectives being addressed in the EIS.

The "overall protection of human health and the environment" is not a valid management objective for purposes of the EIS. The BLM's statement "potential for waivers of liability or indemnification of risk as 'stand-alone' mitigation measures for human health and safety do not satisfy the purpose and need for the CCMA RMP/EIS" is invalid.

**Recommendation:**

Remove the invalid statement from the EIS and replace it with the following text:

"Despite this, if implemented with due care, waivers of liability or indemnification of risk constitute viable means to permit the continuation of existing levels of activity within the ACEC while acknowledging that, although fraught with uncertainty, studies and reports on the postulated health risks of asbestos in CCMA still have value."

Gus Meyner  
Service Sales Engineer/ Account Manager  
Pacific Coast Trane Service  
San Francisco Area office  
office 408-481-3746  
cel 408-857-9168

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"Meyner, Gus"  
<GMeyner@trane.com>  
04/16/2010 08:55 AM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>  
cc  
bcc

Subject CCMA DEIS/ RMP Comment

Subject: Misdirected mission and misleading statements

Referring to the following statement on page III, § ES.2:

“The overall vision for management of BLM-administered lands in CCMA, derived from public scoping, inter-agency dialogue, and BLM’s interdisciplinary team, is ‘to improve natural, cultural, and open space values across the landscape for the protection of human health and the environment; and pursue recreation opportunities through partnerships and collaboration for the enjoyment and use of a growing and diverse populations of current and future generations.’”

and the following statement on page 16, § 1.7:

“The overall vision for management of BLM-administered lands in CCMA, derived from public scoping, inter-agency dialogue, and BLM’s interdisciplinary team, is ‘to improve natural, cultural, and open space values across the landscape for the protection of human health and the environment; and pursue recreation opportunities through partnerships and collaboration for the enjoyment and use of a growing and diverse populations of current and future generations.’”

Discussion:

“Protection of human health and the environment” is the mission statement of the EPA, not the BLM.<sup>11</sup> Therefore these statements are misleading and likely to be misconstrued as an attempt by the BLM to expand their mission and duties beyond their legal mandate and/or usurp the responsibilities and powers of other agencies.

Recommendation:

The DEIS must be edited to change these statements to reflect only the official and true mission of the BLM:

“It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.”<sup>12</sup>

Additional instances throughout the EIS must also be changed similarly. For example:

- Alternative F description on page 19.
- Alternative G description on page 20.

- § 4.1.1, Introduction to § 4.1, "Recreation".
- § 4.2.2.4, last sentence of page 329.
- § 4.2.3, last paragraph of page 329.
- § 4.2.3, second paragraph of page 330.
- § 4.9.3.1, last sentence of the text under the title "Watershed Function."
- § 4.12.5.1, last sentence.
- Page 294, last sentence.
- Appendix V, second paragraph.
- Item 9 paragraph, last sentence on page 656.
- Et cetera

Gus Meyner  
Service Sales Engineer/ Account Manager  
Pacific Coast Trane Service  
San Francisco Area office  
office 408-481-3746  
cel 408-857-9168

---

[1] <http://www.epa.gov/epahome/aboutepa.htm#mission>

[2] [http://www.ntc.blm.gov/leadership/leader\\_blm\\_mission.html](http://www.ntc.blm.gov/leadership/leader_blm_mission.html)

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"Mike N."  
<naps781@yahoo.com>  
02/17/2010 11:02 PM

To cahornp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek comments

\*\*\*\*\* please restrict my name and address from public records \*\*\*\*\*

I would like to express my support for Alternative A from the Draft RMP/EIS for Clear Creek. This is the only sound alternative. There needs to be significantly more studying done by the EPA and other INDEPENDENT scientists before the closure can be final.

- more tests should be conducted
- more analysis needs to be completed
- the public should have a stronger influence in this process

While the above points are getting collected, CCMA should be opened and enjoyed in the interim. I don't agree with the closure, it was hastily done and poorly executed, CCMA should be reopened immediately.

Thanks,  
Mike N.  
Santa Clara, CA

\*\*\*\*\* please restrict my name and address from public records \*\*\*\*\*



Mike Omodt  
<motorcyclermike@gmail.com>

03/04/2010 06:53 PM

To cahormp@ca.blm.gov

cc

bcc

Subject CCMA DRMP/DEIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

Comment #1

Subject: Erroneous Statement

Section 1.1 Purpose and Need for the CCMA Resource Management Plan

"The EPAs CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides significant new information that must be incorporated into a land use plan to evaluate the public health risk associated with BLM land use authorizations."

Discussion

Asbestos is a man-made product, not a naturally occurring substance.

Recommendation

Remove all occurrences of "asbestos", "naturally occurring asbestos", and "NOA" with the "chrysotile" which is the technically correct term for the mineral of concern.

Comment #2

Subject: Erroneous Statement

Section 1.1 Purpose and Need for the CCMA Resource Management Plan

"The EPAs CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides significant new information that must be incorporated into a land use plan to evaluate the public health risk associated with BLM land use authorizations."

Discussion

The EPA's report is at best inconclusive. From page 330 of the DEIS, "In conclusion, the major uncertainties inherent in the assessment to exposure to asbestos (s/b chrysotile) at CCMA and the resulting estimate of risk include factors that may cause the EPA calculated risks to be overestimated or underestimated." In other words, inconclusive! Also, there are other studies that contradict this one in terms of chrysotile fibers collected. Therefore, additional studies must be performed until the facts are clearly understood. Since there is not yet a real health hazard, CCMA must be restored to the preclosure status.

Recommendation

Remove all mention of a health risk based on asbestos exposure.

Comment #3

Subject: Erroneous Statement

Section 1.1 Purpose and Need for the CCMA Resource Management Plan

"The EPAs CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides significant new information that must be incorporated into a land use plan to evaluate the public health risk associated with BLM land use authorizations."

Discussion

The EPAs data gathering model is erroneous. No off road motorcyclist rides directly behind another rider when it's dusty. The EPAs model does not reflect real world exposures. Their model does reflect a potential worst case scenario, which only shows why common sense rules should be followed to minimize exposure.

Recommendation

Remove all mention of a health risk based on asbestos exposure.

Comment #4

Subject: Erroneous Statement

Section 1.1 Purpose and Need for the CCMA Resource Management Plan

"The purpose of the CCMA RMP is to establish goals, objectives, and management actions for BLM-administered lands in CCMA that address current issues, knowledge, and conditions. The CCMA RMP shall guide the management of the lands and resources administered by the Hollister Field Office in CCMA to achieve the following:

- 1) minimize asbestos exposure
- 2) reduce asbestos emissions
- 3) designate areas in CCMA for motorized, mechanized, and non-motorized/non-mechanized recreation opportunities;
- 4) protect sensitive natural and cultural resources from impacts due to recreation and other land uses;
- 5) provide guidance for mineral and energy development; and
- 6) make other land use authorizations and tenure adjustments.

This planning effort is intended to be comprehensive, evaluating existing management plans and identifying regional issues, and resolving those issues through public, interagency, and intra-agency scoping efforts. This effort also identifies the area's "vision", long-range management goals, intermediate objectives, and actions and options for meeting those objectives."

Discussion

1) minimize asbestos exposure and 2) reduce asbestos emissions are no longer valid due to the inconclusive EPA report.

Recommendation

Remove items 1 & 2 from the management objectives list. Remove all related supporting activities and objectives from EIS/RMP.

Mike Omodt  
722 Asbury St  
San Jose, CA 95126



Mike Tanner  
<basket4misc@yahoo.com>  
03/03/2010 08:59 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Management Area Draft RMP/EIS - Comments  
(Minerals)

Dear Sir:

Please allow me to introduce myself. My name is Lyman Hays. Although I am on the board of directors of the Fluorescent Mineral Society, I am writing to you as an individual. This well known and highly respected organization is composed of an international membership. As you might deduce from our name, we specialize in the collection and study of fluorescent minerals. As such we are quite interested in the retention of access to mineral collecting areas. Clear Creek is one such area. It is home to several rare fluorescent minerals including fresnoite, benitoite, and karpatite. The unique mineral formations there also offer an interesting variety of fluorescent minerals in the asbestos and mercury families. Fortunately I had the opportunity to collect in the area shortly before it was closed; some of my prized mineral specimens come from the Clear Creek area.

Opportunities to collect minerals, whether for pleasure or scientific pursuits, are becoming increasingly limited due actions of both private and government entities. Although the western United States is blessed with a trove of mineral species, their distribution tends to be localized depending upon the local geologic past. One must go where the minerals reside. If collection is prevented because of arbitrary restrictions, then the community as a whole (not just the hobbyist and scientist) will be intellectually impoverished.

The BLM has been entrusted with the control of vast tracks of public land. I am sure you agree that this trust is to be administered for the public good. It is in your power to re-open Clear Creek to the public and I respectfully request that you do so that the public may once again enjoy the benefits of this unique area.

Very truly yours,

Lyman Hays  
Westlake Village, CA  
805-379-3503



mpguy@aol.com  
03/08/2010 01:21 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Management Area

The purpose of this email is to voice my concerns over the potential permanent closure of the Clear Creek Management Area.

If the public is notified as to the potential danger caused by asbestos in dust, then it is up to the recreational users to make the decision to use Clear Creek or not. This information can be made public via on site signage, notification in local publications, off road periodicals, and email sites.

Thank you for your consideration.

Wally Boggess Jr



"Natasha Hunt"  
<hunt\_n@hughes.net>  
02/11/2010 07:26 AM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject clear creek

I am writing to ask to be included in the mailing list re: the Clear Creek decision process. I do not necessarily understand the closure as I have been unable to attend the meetings and have heard various reasons, first it was because of asbestos and then it had something to do with an endangered species. I am interested to know what the current situation is and to stay posted of any possible changes or opportunity to get the area back open to public use. As a resident of Coalinga, Clear Creek is a very important to me as it is the only close opportunity for significant recreation on public land. Please add my name to the list of comments in support of reopening the area and please send me any info on the process.

Thank you,  
Natasha Hunt  
PO Box 648  
Coalinga CA 93210  
email [hunt\\_n@hughes.net](mailto:hunt_n@hughes.net)



nate@primusre.com  
03/03/2010 07:13 PM

To "Rick Cooper" <cahormp@ca.blm.gov>  
cc nate@primusre.com  
bcc  
Subject Comments on Clear Creek DEIS

Date: 3/3/2010 Hollister BLM Mr. Rick Cooper Bureau of Land Management, Hollister Field  
Office 20 Hamilton Court Hollister CA, 95023 Dear Mr. Rick Cooper, Please keep this riding area  
open for people like me to ride with my kids. Sincerely, Nate Nickerson 612 Rocky Ledge  
Rd. Austin TX 78746



Nate <nate@dirtricks.com>  
01/12/2010 04:33 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Clearcreek OHV Comments

Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

Dear BLM,

In a time when more and more of our public land is close to us, (the public) I request you re-open the clear creek management area to OHV use. The OHV community takes great pride in this trail system and are the ones who maintain them. You will not see greater volunteer involvement, trail maintenance efforts, or area clean up as you do from the OHV users. We are the one who truly take pride in this area, therefore I request an immediate re-opening.

Thanks for making the right decision on this ultra important matter,  
Nate Delaney  
2559 Precision Dr. #4  
Minden, NV. 89423



nathan mcreary  
<nmccreary@inbox.com>  
02/08/2010 08:33 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

To whom it may concern,

I am not sure if it is past the period of public comment on the future of the Clear Creek Mg. area, but since I was unable to attend the public comment meetings I will weigh in here. I have visited this region for camping, hiking, and rock hounding for five years. I believe that there is a great need for this land to remain public and open for some recreations. There are few areas of such an interesting geologic make up as Clear Creek. It is this very unusual mineral make up that has caused the concern over the area. I recognize the concern and the need to manage the land to limit exposure to Asbestos.

It is true that the use of this area as an off-road driving area is not a good idea. The off-road riding raises great amounts of dust that can then be inhaled. I respect individuals desire to ride off-road and wish there were a way to protect these riders from the hazards of this dust. Short of paving the whole area, there is no way to achieve this safety.

This land is multi-use however, and the other uses of this land are not creating dust and disturbing the topsoil. The small amount of dust caused by rock-hounding is not endangering anyone. Hiking is not harming the soil either and does aid visitors in seeing the landscape and many features of the area. Upland hunting is another activity that is safely not disturbing the soil and one that is enjoyed by many as a public right.

As a rock-hound myself I feel there are so few areas that allow legal collection that I need this area accessable. The paving of the main access roads and prohibiting off-road riding seems to be the best solution possible. I am sure that many off-road riders will be upset by this apparent change of the BLM's use standards in the area. I would like to say that they should be able to take there own risk, but after seeing very young children following there parents on dirt bikes in a cloud of dust, I have to decline that argument.

Thank you and I hope this is not too late.

Nathan McCreary  
nmccreary@inbox.com

---

GET FREE 5GB EMAIL - Check out spam free email with many cool features!  
Visit <http://www.inbox.com/email> to find out more!



nvleisides@creeksidechurch.com

03/05/2010 01:32 PM

Please respond to  
nvleisides@creeksidechurch.com

To cahormp@ca.blm.gov


cc

bcc

Subject Clear Creek Management

To Whom It May Concern,

I have been a frequent off road user of Clear Creek for over 25 years. I pastor a church in Danville, Ca of around 500 people. We have around 10 families who frequent Clear Creek to camp and ride off road. I am a Sherriff chaplain for the county and a Fire chaplain as well. My good friend Rich Burkett owns the Burkett Ranch which borders the entrance to Clear Creek. They have owned their ranch since the 30's. We love Clear Creek and it is the only place like it in close proximity to the Bay Area. We were devastated to have it shut down to the public. I have never heard of a single case of cancer or asbestos related illness stemming from occasional use of Clear Creek. My friend Rich has never heard of a single case among all the ranchers surrounding Clear Creek in their 80 years of owning their ranch there. All the years of mining and trucking asbestos in its raw form have not had any measurable negative health results. Yet, the EPA shut it down. I understand the mandate to protect the public from health hazards but this has gone too far. The scientific thresholds for measuring asbestos seem biased and unreasonable. The science regarding the affect of minimal contact with particles of unrefined asbestos is skewed to accomplish a shut down. Clear Creek could hardly be more remote than any other off road riding area in the state. A vast majority of off roaders only visit a few times a year. Ultra violet rays from the sun pose a great threat of skin cancer to the public but the EPA does not prohibit people from going out into sunlight or getting sunburned. Living on the planet has many inherent risks. Just riding a dirt bike poses a potential for harm, but we permit people to own and ride. The risk of riding in this remote area is very, very low as it relates to contracting asbestos related mesothelioma cancer or any other respiratory disease. The EPA might have finally produced the measurements they needed according to their own science. They and other groups have wanted to close down Clear Creek for over 20 years. In all those years no one has produced any clear link to riding in Clear Creek and adverse health affects. This land belongs to the public and I have no concerns for taking my family to Clear Creek at all. The road to Clear Creek is far more dangerous and has actually claimed lives. But the government is not going to shut the highway down. Allow the public to continue having full access to one of the most beautiful and popular riding areas in the state. We all acknowledge the presence of an asbestos mine and no one disputes the health risks of refined manufactured asbestos. But Clear Creek does not present that kind of threat or risk. Has there been one single law suit won against the BLM related to an actual proven case of asbestos related illness? The closing of Clear Creek was an extreme measure and not really in the best interest of the public who has frequented this place for 50 years. We are just sick about this. Now, according to my friend Rich, my government is spending millions to truck in (not too successfully he reported, i.e., highway not wide enough) some special engineered vehicle washing stations at Clear Creek. Another example of government misusing tax dollars and using the asbestos alarm to create an excuse to grow the government machine. I am sure there are some sincere folks who really believe they are looking out for the public and believe they know what is best for us in spite of our protests. But this is way too much and not necessary. Please reopen our land. Has anyone from the Salinas Ramblers, who have owned property at Clear Creek for their off road club for decades ever reported health issues related to unrefined asbestos exposure? Thank you.



Nick Vleisides



ole.s@comcast.net  
04/19/2010 04:28 PM

To cahormp@ca.blm.gov

cc

bcc

Subject Comments for the Draft Resource Management Plan and  
Draft EIS

History:  This message has been replied to.

CCMA RMP/EMS Team: Please consider the three page attachment for comments toward the Draft Resource Management Plan and Draft Environmental Impact Statement.

Please also acknowledge receipt of this e-mail and 3-page attachment. Thank you.



Sincerely, Sherry Stortroen Clear Creek Comments, April 19, 2010.doc



OnyxCollector@aol.com  
03/02/2010 11:53 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek Management Area EIS

To Whom It may Concern:

As an environmentalist and frequent visitor to Clear Creek, I welcome this opportunity to comment on the EIS.

The Hollister staff are to be commended for the numerous elements of the preferred alternative that continue the protective administration of area with endangered animals and plants, their concern for the watershed, and their being open to continue to allow hunting in Clear Creek.

It must be said that asbestos has been over-emphasized as a primary concern. Asbestos, endangered species, air and water quality, are all secondary to the primary concern of recreation. The staff in the Hollister office have done a fine job with these secondary issues in the past.

I specifically disagree with the following sections of your preferred alternative:

Trans-E1 and Energ-DEF1 Both these sections eliminate access from the Serpentine ACEC, and I find this to be unacceptable. The ACEC has numerous important sites and needs to remain open to the public, even if only on a somewhat limited basis. The ACEC should be kept open to mining and rockhounding.

Trans-E5 and Air-BG2 Both these sections deal with access to Clear Creek during weather extremes. Weather has had no effect on visitor health or safety in the past. Couple this with the fact there remain a considerable number of questions as to the veracity of the EPA report and there remains no need to close the ACEC or Clear Creek as a whole any more than in the past.

Speaking broadly, I am very concerned that collecting minerals, gems, and lapidary material continue to be allowed in Clear Creek, including the ability to access those areas. Clear Creek, besides being the only location of the state gem, contains gem quality neptunite, melanite and grossular garnet; amazing mineral specimens; lapidary material such as serpentine, chromite, and plasma agate. Clear Creek needs to remain open to mining opportunities for the public.

Numerous areas of the ACEC can be closed to assist in public health, such as the main pit, but plenty of roads, mining claims and prospects should remain open to

the public.

David Dills

PO Box 446

Onyx, California 93255-0446

(760)793-7401



P Tehaney  
<redridersrip@hotmail.com>

01/06/2010 04:15 PM

To <cahormp@ca.blm.gov>

cc

bcc

Subject Clear Creek Comments

To whom it may concern:

I am writing this letter in regards to keeping as much land as possible open , for our families and friends to enjoy while enduring one of the true last outdoor activities - Off Highway Vehicle Use. Millions of OHV users pay a yearly fee in order to enjoy using their vehicle and by closing down more areas, all that is being accomplished in cramming all of us in a smaller area , causing more accidents and severe damage to the land . After all, hikers and mountain bikers do not pay any type of fee for using these areas .

By keeping more acreage and areas open, it allows trails to be maintained easier , (Allowing access for people to work on them while other trails are open ) and ensures that we are not leaving a harsher impact on a smaller amount of land . All too often, we see new fences going up and trails being closed down, many for no apparent reason .

Off Highway Vehicles are truly one of the few and last outdoor activities that families can still enjoy while still spending quality time together and getting the kids off the couch and putting the video game controller down . Outdoor activities like these also allow our kids and families to receive much needed exercise and education regarding nature , coordination and most importantly responsibility . Families also get the opportunity to communicate and share great stories around the truck tailgate or campfire at night .

I truly believe raising our green and red sticker fees is one way to help generate funds for proper trail maintenance and to ensure staffing levels . I would bet that most Off Highway Vehicle owners would support this type of action , knowing that their favorite trail would remain open and that they would not be crammed into a small area with new fences being put up along the perimeters .

Thank you for taking the time to read this letter as I know I speak for many of the people I run into weekly on the trails, forums and campgrounds in the state of California that don't believe they have time to give their opinion or just are not sure how to do it .

Regards-

Paul Tehaney

---

Your E-mail and More On-the-Go. Get Windows Live Hotmail Free. [Sign up now.](#)



**"Pat Rebich"**  
<prebich@sanluisautobody .co  
m>

02/17/2010 09:47 AM

To <cahormp@ca.blm.gov>

cc

bcc

Subject Clear creek & EIS

Hello. Clear creek is one of the most fun area's probably in the world to be able to ride, and I hope that it will soon be open for all. Charge @ the gate, whatever, just make it accessible so people can enjoy it. Let we the people worry about the health logistics, sign waivers, and be responsible for our own destiny. The sad state of affairs our country is in has a lot to do with the freedoms we lose on a daily basis.

Sincerely,

Pat Rebich

General Manager

San Luis Autobody



Phil & Debbie  
<philiprw@thegrid.net>

02/28/2010 08:20 PM

Please respond to  
Phil & Debbie  
<philiprw@thegrid.net>

To cahormp@ca.blm.gov

cc

bcc

Subject CCMA RMP/EIS Comments

Dear Planning Coordinator,

I have attached my comments regarding the alternatives identified in the CCMA RMP/EIS. I am also mailing a signed copy by USPS.

Respectfully,



Philip R. Ward Phil Ward CCMA RMP EIS.doc



phwinslow  
<phwinslow@juno.com>  
03/03/2010 04:58 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Comments on Clear Creek Management Area Draft RMP/EIS

For many years, when we lived in California, my family and I rode at Clear Creek. My boys learned a great deal from that experience. How sad that many more families are prohibited from enjoying Clear Creek because of misused and erroneous studies of a health hazard from asbestus in the soil. No evidence has ever been found that anyone has suffered asbestus caused illness from riding in the Clear Creek area.

I strongly urge the BLM to reverse their decision to close this wonderful riding area. At the very least the BLM should extend the public comment period 90 days from the Feb. 12th date. Please apply common sense to this situation and start looking at a solution which considers the thousands of families who need an accessible place to ride.

Sincerely,  
Paul Winslow  
5825 S. Ranch Park Ln  
Spokane, WA 99206



"Przykucki, Robert"  
<Robert.Przykucki@netapp.com>

12/17/2009 02:04 PM

To <cahormp@ca.blm.gov>

cc

bcc

Subject CCMA RMP/EIS Comment

To whom it may concern,

I would like to express my outrage at the closed nature of the procedure employed regarding the use of this public land (CCMA). There is clearly an agenda against OHV use and there appears to be strong influence from anti-OHV political groups. There is no evidence to prove that the soil within the CCMA has lead to any injury, respiratory illness, or long term disease.

The decision to close CCMA happened with little to no transparency  
There was no evidence presented to warrant the closure of this land  
It took 2 years to write a report, yet you want to make a decision in less than 90 days. This gives us no time to respond to the report.

This procedure to close CCMA is rushed and strongly biased against OHV use. There appears to be no adult supervision at the Hollister Field Office and the horrific mis-management of CCMA should be investigated by an outside independent committee.

My preference is that we approach the use of this land without any bias and political agendas. If science is required, then an epidemiology report should be conducted to prove beyond a shadow of a doubt that the use of this land causes health issues. As an adult, I would sign any waiver to allow me full access to this land.

If health issues are not the driving force to this closure, then I would like this to be public knowledge with more transparency. >From what I can tell, this is the independent action of the Hollister Field Office with an axe to grind against certain OHV users that can't follow the rules.

I am strongly against closing this land. This is a special place that is unique to OHV and the best use of this land is to continue full access to OHV users.

Sincerely,

Robert Przykucki



"r" <ricle@comcast.net>  
04/11/2010 05:47 PM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Please reopen The Clear Creek Management Area ASAP

Having recently driven the road between Coalinga and Holister I was reminded it is an incredibly scenic drive in the Spring. I was saddened to hear that the Clear Creek area is still closed to the public after two years in limbo. The Clear Creek area is both a beautiful area to see and a great photographers and rockhounds area as well as many other outdoors activities that needs to be open ASAP to the public to enjoy. I would consider myself a practical environmentalist but it is obvious in this case the environmental issues have obviously been very much overblown and do not remotely justify closing such a large area to the public, who collectively own the land, for such a long period of time.

Sincerely R Leathers



"Randall R. H. Adams"  
<r3r3r@yahoo.com>  
12/24/2009 12:56 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Comments on Clear Creek DEIS

Attn: Rick Cooper  
Field Manager  
Hollister BLM Field Office

Thank you for the opportunity to comment on the Clear Creek Management Area DEIS.

I will begin by stating that I am a motorcycle rider, a mountain biker, a hiker, an environmentalist, and a land use professional. I am aware of the complex issues involved in the preparation and review of a management plan for an area such as Clear Creek. I also acknowledge the challenge the BLM faces in balancing access to public lands with protection of natural resources and in mitigating potential hazards from such public access. I have reviewed the DEIS and would like to provide the following comments.

Although it is important to identify appropriate trail routes to protect natural resources and to provide public information for individuals entering an area of potential hazards, the elimination of OHVs from the Serpentine Area of Critical Environmental Concern (or the entire CCMA) is not warranted based on the studies performed. Proper route designation and location to protect natural resources, combined with public information regarding asbestos risk, are all that is needed to allow continued OHV access in the CCMA.

As cited in section 3.2.3.1 of the DEIS, the off site exposure to asbestos from OHV use is limited and is similar to background thresholds in the North Central Coast and San Joaquin Valley air basins, therefore the only potential hazardous exposure is to individuals who voluntarily enter the ACEC. This potential hazard is further confused due to the fact that the thresholds used to measure the asbestos health risk were not developed for outdoor exposure from periodic OHV or other recreational use. As cited in section 3.2.3.1 of the DEIS, the IRIS and OEHHA toxicity values for asbestos were developed for workplace exposure to intermittent high asbestos concentrations over extended periods. These two methods were not developed to apply to periodic recreational asbestos exposure and additional testing is needed prior to arriving at the conclusion that periodic recreational use in the Serpentine ACEC will result in an increased risk to individual health.

Prior to permanently closing the Serpentine ACEC to OHV use (or public motorized access of any kind), the following measures need to be taken: Additional testing of the amount of long term asbestos exposure any individual would have while using the area periodically on an OHV, the size and type of asbestos material that may be ingested or released, and the actual detrimental effect over the long term resulting from the amount and type of asbestos on any individual (or the general public) as a result of periodic OHV use in the ACEC.

Regardless of the asbestos and natural resource concerns, the access for the general public to the CCMA and the Serpentine ACEC for motorized recreation should not be substantially reduced or eliminated in the management area. If the CCMA becomes an area that is essentially closed to OHV use, there will be additional off-site impacts that need to be adequately evaluated. As cited in section 3.1.4.3 of the DEIS, OHV users are on the increase and demand for OHV

areas is high in California. These OHV users need to have access to public lands in which to operate their OHVs in a safe and responsible manner. Additionally, the access to public lands for OHV use has become very limited near urbanized areas, as cited in section 3.3.5 of the DEIS. As a result, the permanent (or undetermined temporary) closure of the CCMA to OHV use will create additional impacts in terms of vehicle miles traveled on local roads and state highways to arrive at alternate OHV parks. The assessment of the impact of these additional trips and vehicle miles on state and local roadways and intersections has not been adequately evaluated. Such a closure will also result in additional OHV vehicle use at alternate OHV parks in the region. As cited in sections 4.1.8.1, 4.1.9.1, 4.1.11, & 4.3.11 of the DEIS, the closure of the ACEC to OHVs would result in foreseeable increased impacts to existing OHV parks in the surrounding region. This would apply to all Alternatives (B, C, D, E, F, G) that reduce OHV access or close the ACEC to OHV use, and are not limited to the "preferred" Alternative E or Alternatives F & G. The assessment of the impact of these additional OHVs at alternate parks has not been adequately evaluated. No mitigations to these potential impacts have been identified in the DEIS. Given the high recreational OHV demand in the region, every OHV park closure (or reduction in access) should identify new (previously closed or unavailable) public lands that are to be opened to OHV use within the same management region as the closure in order to offset these potential impacts.

Although I have not attempted to address all of the issues raised in the DEIS, I feel that there is a need to question the fundamental thought process behind closing a management area entirely to public use without a full and complete scientific assessment of the impacts of such a closure. The removal of yet another of the very few OHV parks in the vicinity of the SF bay area and central coast region will only put more stress and strain on other parks (such as Metcalf, Hollister, & Carnegie - also facing threat of closure). In order to avoid potential impacts to other OHV parks (and natural resources on public lands in general) another park of equal size, quality, and proximity to the SF bay area and central coast region would need to be identified and established prior to any permanent closure of the CCMA or ACEC to OHV access. For this reason alone, I strongly encourage your office to keep the existing OHV access to the CCMA and ACEC open to the greatest extent feasible.

It is my sincere hope that your office will continue the BLM's mission of providing public access to our public lands, while protecting natural resources. Please remember that the use of any natural public area involves exposure to a variety of hazards found in the natural environment. I trust that your office will do what is necessary to balance these concerns and to re-open the appropriate portions of the CCMA to motorized use as soon as is possible.

Thank you again for the opportunity to comment.

Randall Adams  
332 Linden Street  
Santa Cruz, Ca 95062



Randy Johnson  
 <randuzi@yahoo.com>  
 03/05/2010 02:30 PM

To cahormp@ca.blm.gov  
 cc Amy Granat <granat.amy@gmail.com>, "randuzi@yahoo.com" <randuzi@yahoo.com>  
 bcc

Subject Additional substantive comments for the 2009 CCMA DRMP/EIS

Attached are 5 substantive comments, in addition to the first of which I submitted via email to your office on March 3 for the 2009 CCMA DRMP/EIS.

Here is a listing of my comments, both currently attached and previous.

Submitted March 3, 2010 via email:  
 Substantive Comment-1-Purpose and Need.pdf

Submitted in this message, March 5, 2010:  
 Substantive Comment-2-Age Restrictions.pdf  
 Substantive Comment-3-Seasonal Closure.pdf  
 Substantive Comment-4-amphibole asbestos.pdf  
 Substantive Comment-5-use days restriction.pdf  
 Substantive Comment-6-alternative selection.pdf

Along with my submitted substantive comments I would like to add a general comment as I would like to be counted among those who believe that alternative A is the appropriate alternative for selection. EPA has no authority under CERCLA rules over Naturally Occuring Asbestos deposits and only claims so on the weak argument that CCMA can be included as part of the Atlas Asbestos Mine Superfund Site based on the definition of facility in the regulations. However, the claim is without scientific merit and if the argument were true then all highways leading from CCMA, all lands geographically near to CCMA, and based upon expert geologists reports that historical CCMA chrysotile erosion over the past thousands of years has spread to thousands of square miles of surrounding drainages, all lands that lie along those drainages all the way to the Pacific Ocean could all be considered facilities of the Atlas superfund site under EPA's contention. BLM should not allow itself to continue to be a slave of EPA's whims and lack of adherence to scientific principles in this matter and should acknowledge the deficiencies, errors, and misrepresentations found withing their 2008 CCMA Human Health Risk Report. I discuss many of these issues in my substantive comments, including the five currently attached and the previous one which you recieved on March 3 of this year.

Thank you and I look forward to seeing the effects of my comments upon the final CCMA Resource Management Plan and Environmental Impact Statement.

Randy Johnson



Substantive Comment-2-Age Restrictions.pdf Substantive Comment-3-Seasonal Closure.pdf



Substantive Comment-4-amphibole asbestos.pdf Substantive Comment-5-use days restriction.pdf



Substantive Comment-6-alternative selection.pdf



Randy Johnson  
<randuzi@yahoo.com>  
03/03/2010 03:58 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Substantive Comment #1 for November 2009 Clear Creek  
DRMP/EIS

Attached is the first of my substantive comments for the November 2009 CCMA DRMP/EIS. There will be more to follow on Friday.

Randy Johnson  
6406C Buena Vista Dr.  
Newark, CA 94560



Substantive Comment-1-Purpose and Need.pdf



Rdhlvs3@aol.com  
03/16/2010 06:19 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject "ClearCreek"

Here in the Central Valley I have been talking with so many out doors man about the closure of Clear Creek. So many are so disgusted about the closure, they wonder what is next. We are all so far away from any good areas. Alot of the Central Sierra above us is closed. I ride atv's and this area of Coalinga is great for getting away. The Centra Vally of Calif needs some place to go to enjoy, besides being bunched up in areas like Hollister Hills, Pismo, etc: Those areas are always full. I have enjoyed the Clearcreek Area for 30 years, and have no signs of Cancer or Lung disease. Please reconsider on the closure of the area. Thank You, Ronald Hobbs



Rdhlvs3@aol.com  
02/28/2010 07:06 PM

To Kathryn\_Hardy@blm.gov  
cc  
bcc  
Subject "CLEAR CREEK CLOSURE"

Hello Kathryn, I'am writing to you in response to the closing of ClearCreek Recreation Area. I am a avid deer hunter, wild pig hunter, and also a trail rider of old Honda "90"s. I have been using the Clear Creek area for over 30 years, I have yet to find in my system any signs of Cancer or asbestos in my body. I used to play in the asbestos at the 3 area mines, when they were open. What are us riders gonna do?, I live at the bottom of the Sierra Nevadas here in the Central Valley of Calif, below Sequoia National Forrest,,, every year I see more road, and trail closures, this is not fare, considering all the money we pay for tags, green stickers, permits, etc: I really dont believe the Hollister, Calif office of BLM really cares about opening or closing "ClearCreek". It is such a nice place for us Central Calif riders to go for a relief. Is there some thing you can do to keep the area open, We beg of you!,,,, Thanks Very Much, a voteing citizen,, Ronald Hobbs,,, Exeter, Calif. ( ps. I just can't see every one of us going to the Hollister Area Campground)



Rdhlvs3@aol.com  
12/30/2009 06:20 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clearcreek,

Hello, concerning the ClearCreek Recreation Aear closure, it is a shame that so many areas are closed in this state for access because of some extenct plant or animal, I have been using the Cleer Creek area for 30 years, I was there when there was not a atv, motorcycle of any kind. I have foot hunted the area for many years and stayed away from the mines. I have no signs of cancer, every thing in my life have a chance of giving me cancer, what about all the spray dope they spray here in the citrus area of Central Calif? When I but my off road stickers, license's and such it just buys more locks for the gates. The area is so nice for the Central Valley riders, not so populated, and close. Even a higher use fee maybe?, and maybe to sign a affidavit that no one could sue the BLM because of sme thing happening to them in the area?. I love just to rockhound there and just camp, no riding. So please in some way, reconsider the opening of the area, or at least some of it. Thank You, Ronald Hobbs, Exeter, Calif.



Rebecca Rosas  
<rebecca\_rosas@live.com>  
04/06/2010 02:42 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Clear Creek

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that uses science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the **only** alternative that we prefer along with these following recommendations:

- I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Crystotile asbestos.\*
  - A. Let the study "precisely delineate" all dangerous asbestos areas.
  - B. Let roads through all dangerous areas be sealed.
  - C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.
    1. Were they disabled because of asbestosis?
    2. Were they hospitalized with asbestosis?
    3. Are they now suffering ill effects of their work environment?
      - a. Explain their ill effect, if any.
- II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or

thoroughly cleaned up.

III. Let rockhounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.

\*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.

IV. Waiver-of-Liability forms may be acceptable for rockhounds.

V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

A. Let rockhounds be permitted 24/7.

B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.

VI. Let the public lands with grazing rights leased to local ranchers be completely open for rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

VIII. Archeological or sites of historical significance should be viewable but protected from vandals.

A. This will include hieroglyphics, engravings, paintings, or other artifacts.

B. High fences, posting signs, and signs explaining the artifacts significance may be required.

IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA.

X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely,

Rebecca Rosas

---

The New Busy think 9 to 5 is a cute idea. Combine multiple calendars with Hotmail. [Get busy.](#)



"Richard Spotts"  
<spotts@infowest.com>  
03/04/2010 09:50 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject My comments on Clear Creek Management Area Draft  
RMP/EIS

March 4, 2010

CCMA Draft RMP/EIS  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
Email: [cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)

RE: My comments on Clear Creek Management Area Draft RMP/EIS

Dear Planning Coordinator:

Please accept this E-mail with my comments on the above-referenced matter, and include it in the appropriate administrative record.

I strongly support the closure of this management area to motorized recreation. The EPA risk assessment clearly demonstrates the serious risks to public health and safety from any continuation of this previous use. Asbestos from serpentine soils in this area can become airborne and be breathed into the lungs. This is especially true when motorized vehicles travel on these soil surfaces and stir up dust. Asbestos in lungs can become mesothelioma, a very deadly form of cancer. In any balancing of public health with recreation, public health should always receive the priority and the benefit of any doubt.

I know that the Blue Ribbon Coalition and other motorized recreation groups want this area to continue to be used for motorized recreation. They tend to downplay the risks, and question EPA's expertise in the risk assessment. I believe that this is irresponsible as it places ridding for fun above the health of the riders. This is foolish, selfish, and dangerous. Please do not let these obstructionist tactics keep you from doing the right and safe thing in the public interest.

Thank you very much for considering my comments.

Sincerely,

**Richard Spotts**

**1125 W. Emerald Drive**

**St. George UT 84770-6026**

**[spotts@infowest.com](mailto:spotts@infowest.com)**



Rick Adan  
<rick.adan@sri.com>  
12/09/2009 02:15 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Draft Environmental Impact Statement (RMP/EIS) for the  
Clear Creek Management Area (CCMA),

The Clear Creek closure was based on an incorrect conclusion. The type of asbestos at Clear Creek has never caused a health problem for a single person and you know this to be true. So why was Clear Creek closed? Clear Creek should be opened and BLM should take the position that the type of asbestos at Clear Creek is safe as has been shown in previous studies and health records of the asbestos workers at the asbestos plants that were at Clear Creek.

I have been riding motorcycles at Clear Creek since 1970 and I have not had any health problems caused by asbestos.

Rick Adan



Rick Kennedy  
<riken@flash.net>  
03/02/2010 10:36 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP/EIS

Good morning Hollister BLM Office,

My name is Rick Kennedy and I have had the pleasure of meeting some of you in the office personally. I also supplied most of the minerals that are in the display at the Hollister office. I have collected in the CCMA since 1984. I have given a number of talks about the minerals found in the CCMA and led several field trips to various localities within the CCMA. Both clubs that I belong to (Bay Area Mineralogists and Santa Clara Valley Gem and Mineral Society) are working on official letters, but I thought it prudent to send my own letter in.

As a mineral collector/rockhound, these are vital to my enjoyment of the CCMA: Four wheeled access and overnight camping. Although I am relatively hale and can hike several miles, most of the people in my clubs are Senior Citizens and need to be able to drive within a 1/2 mile or so of any locality. Keeping most of the "R" roads open, especially R1, R5, R11 and some of the roads between them would facilitate access to important collecting locations. Closing some of the "R" roads and most if not all of the "T" roads is a compromise I could live with.

As for overnight camping, although we do day trips occasionally, we tend to prefer one or two night stays near the localities we are collecting. It is an awful lot of driving on rough roads to make every trip a day trip.

Personally, I am open to paying for permits and for having a limited number of total days in the CCMA. I think somewhere between 10 and 15 total days would be reasonable.

I understand that drastic changes to the usage before the closure are needed to satisfy the EPA. I am hoping the accessibility I propose would satisfy them.

The alternative chosen as the "best fit" by the BLM does very little to address the usage needs by the mineral collecting/rockhounding community, but it doesn't take very many changes to that alternative to allow for a 150 year old tradition to continue. This area is a mining area and has been one since Mercury was discovered in New Idria so many years ago. It would be a shame to permanently close access to such a unique mineralogical area.

Sincerely,

Rick Kennedy  
5360 Colony Park Circle  
San Jose, CA 95123  
(408) 529-9690

**Member of Bay Area Mineralogists**  
**Vice President of Santa Clara Valley Gem and Mineral Society**



robbie\_3146@razzolink.com  
03/02/2010 05:52 AM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Clear Creek Management Area Draft Resource Management  
Plan & Draft Environmental Impact Statement .

The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to consider the vastly lesser exposure of recreational visitors compared to the studies daily workplace exposure.

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek.



Robert Henry  
<rvhenry65@yahoo.com>  
03/05/2010 12:40 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject 2009 CCMA DEIS/RMP Comments

Gentlemen,

Please see the attached file for my comments on the 2009 CCMA DEIS/RMP. Please verify receipt of file.

Thank you for your time.

Sincerely,

Robert V. Henry, PE  
1116 Bay Street  
Santa Cruz, CA 95060  
831.421.0564



CCMA\_DEIS\_Comments RV Henry.pdf



"Rocky Hill"  
<rocky@tote.com>  
03/01/2010 09:14 AM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA RMP/EIS

Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

2/25/2010

Rick Cooper  
Field Manager  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

Re: November 2009 Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS)  
for the Clear Creek Management Area

Dear Mr. Cooper:

We own property in Hernandez Valley, 4,000 deeded acres Rancho La Cuesta, for almost 14 years and with this ranch came the leases of BLM pasture properties # 04410 Hernandez Ranch and #04409 Bar B Ranch. Our property borders large portions these BLM properties, approximately 2,000 acres to the north and 2,000 acres to the south of the BLM leases. Since 2001 we have placed our ranch in cooperation with Department of Fish and Game (DFG) into a wildlife management plan called Private Lands Management (PLM). Prior to placing the ranch into the PLM program it was used as a cattle grazing operation. Since the PLM program all livestock have been removed from all of the ranch except a small portion near our house at the southern edge of the property, we use the lease property for the grazing of the local wildlife. We have spent considerable time and expense over the last nine years improving the habitat (water, forage) surrounding the BLM property to the betterment of the local wildlife population and the results have been very good. Deer populations are up considerably, Turkey populations are increasing and the Elk populations have increased dramatically. There is even a pair of nesting Bald Eagles that have produced over nine offspring. These are a direct reflection of the removal of Cattle (vegetation competition) and the decrease in vehicle usage in and around the BLM property.

We would like to propose the following:

1. Keep the leases as they are now on a yearly lease. It does not cost the BLM any money and provides an invaluable wildlife resource to a very sensitive area. Disposing of the property at auction does not ensure that this pristine property stay as it has since it was homesteaded in the 1800's.
2. Keep existing restrictions on vehicle traffic. The soil type in #04410 and #04409 are adobe and very susceptible to erosion from OHV and larger vehicles. The lessee is responsible for upkeep on the roads, no cost to BLM.
3. Remove this property from the connection with the CCMA and manage it separately from the CCMA.

BLM not adding these parcels to the CCMA OHV and trail system.. Just as there are many pieces of BLM in the surrounding areas that are not included in the CCMA.

4. And lastly if the top three proposals are not feasible we ask that BLM sell it to us and as a condition of the sale we would sell, or BLM can keep, the development rights of the parcels so that these delicate parcels will forever maintain their special status.

Sincerely,

Rocky and Aurelia Hill  
Rancho La Cuesta  
408.297.7910



BLM CCMA.wps



Ronald Hobbs  
<rdhluvs3@aol.com>

03/03/2010 01:59 PM

Please respond to  
Ronald Hobbs  
<rdhluvs3@aol.com>

To Bureau of Land Management - Hollister Field Office  
<cahormp@ca.blm.gov>

cc

bcc

Subject Comments on CCMA Draft RMP/EIS

Dear Planning Coordinator,

I support the No Action Alternative that restores historic OHV use on up to 270 miles of routes and approximately 450 acres of barrens. Permitted OHV events should be allowed. If some small health risk is identified by a new risk assessment or a review of the EPA's 2008 report, the BLM should use signs and educational outreach as a way to inform the public rather than closing this important OHV area on a permanent basis. It would be most important to warn people of the asbestos danger than close the riding area's of ClearCreek. I have rode and hunted there for 30 years or more. When we were asked to stay away from the Mines in the area's, WE DID SO!,,WHEN WE WERE ASKED TO DONT TREAD THERE WE DID SO!, But to just close the whole area down would be a terrible lose to all of the Central Calif outdoors men and women. So please reconsider and keep CleerCreek open for my future generation, on behalf of my family, Thank you

Sincerely,

Ronald Hobbs,  
Home  
25746 Rd. 204  
Exeter, CA 93221



<rp@rocketpillow.com>

03/03/2010 02:35 PM

Please respond to  
<rp@rocketpillow.com>

To <cahormp@ca.blm.gov>

cc

bcc

Subject CLEAR CREEK CLOSURE

**To Whom It May Concern:**

My name is Rob Porcella and I am an avid motorcycle rider. I discovered Clear Creek in 2004 and brought my wife and stepson there to ride for their very 1<sup>st</sup> time on motorcycles. We camped there many more times after that and grew closer as a family enjoying the recreational sport of motorcycling together. I had read about the asbestos that was natural to the area and decided that it was a risk I was willing to take because enjoying those mountains was worth the risk. I also consulted with my father who was a Geophysicist for the U.S. Geological Survey, and his thoughts were that the natural asbestos would probably have to be constantly inhaled on a daily basis for years to adversely affect someone. For example the miners who worked in the caves for years inhaling the asbestos dust. I have yet to see a study that demonstrates where OHV riders who have enjoyed this area throughout the years have developed some sort of asbestos related illness. I am afraid however that the naturally occurring asbestos is just an excuse for more OHV closures by special interest groups that feel OHV recreation is destructive to the land and habitat of the areas in which they are designated. Please look at this issue in a fair and balanced view and make the decision that is right based on the facts of this individual case. Thank you for your time.

Sincerely,  
Rob Porcella  
Clovis Smog Shop  
Clovis, CA  
559.270.4549



"Ryburn Family"  
<sryburn@kcbx.net>  
01/09/2010 02:25 PM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Public comment-Clear Creek Management Plan

BLM Holister Field Office:

Clear Creek has been open to OHV use for decades. OHV enthusiasts have enjoyed and appreciated the riding opportunities Clear Creek has had to offer. We understand the current health concern regarding asbestos exposure. Perhaps a simple solution would be to open Clear Creek to OHV use on a seasonal basis. Once the winter rains have eliminated the dust, the health risk would seem to be minimal. This coupled with an OHV user fee expressly for trail and staging area maintenance should mitigate most of the problem. These measures would be acceptable to most OHV riders of the Central California area if it meant Clear Creek would remain open to OHV use.

Respectfully,

Steve Ryburn  
Atascadero, CA



"R.E.C."  
<recses@comcast.net>  
03/05/2010 09:16 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP/EIS Comments

**CCMA RMP/EIS Comments**

Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office, 20 Hamilton Court, Hollister, CA  
95023

**To Whom it may Concern:**

I would like to champion the rights of ordinary, respectful rockhounds and mineral collectors, who have been shut out of area after area of public and private lands in California, particularly lately in the southeastern deserts. I believe that the alleged dangers of potential exposure to asbestos-type materials in the dust of the Clear Creek area DOES NOT represent a significant health hazard in the case of casual mineral collectors, certainly not a hazard justifying removal of the lands from potential rockhounding areas. We do not need more government protection from so-called hazards we can clearly see, understand and evaluate. If you want to stop lung cancer, ban cigarettes, don't over-reach yourselves and sound science, and ban healthy outdoor activities in California!

Robert E. Crabill  
San Francisco Gem & Mineral Society



Sam Baxter  
<sam@baxters.net>  
03/02/2010 01:18 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Closure of Clear Creek

BLM,

While it is of concern to watch out for my well being on public lands, it is also a necessary consideration for you to allow me to explore this beautiful land. There are inherent hazards in rock falls, animals, plants and a host of critters: but we don't close parks and public lands because they exist.

Take into account your concerns and level that with what works best for all of us to enjoy this beautiful natural resource.

I doubt John Muir hesitated to hike anywhere in California because of concerns of radium in granite, phosphorous in rocks or asbestos in dirt. Do what is best for us all and do not pick the easiest alternative. Work with us on suggestions for safety, health and recreation issues at Clear Creek.

God Bless and I won't close the City of Santa Clara because there is too much traffic and you might get injured and sue us.

Sam Baxter  
192 Muir Ave.

Santa Clara, CA 95051

Phone: 408-981-6029

Avid Outdoor Guy who hikes, bikes, kayaks (I am living with the Quagga (sp) mussel crisis), caves, collects rocks and generally likes to see a California Condor soar.



Sebastian Ubillos  
<sebas01@gmail.com>  
02/28/2010 11:15 AM

To Rick Cooper <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Re: Comments on Clear Creek DEIS

<http://www.scribd.com/doc/25085044/In-re-deCODE-genetics-Inc-Motion-to-Reject-Change-in-Control-Benefit-Plan>

Te puedo hacer uno para el trabajo o doctor para que te dejan de disaprovar.  
Asi se pelea sin ir a corte, asi lo hacen gente educada y escribanos.

Hollister BLM Mr. Rick Cooper  
Bureau of Land Management, Hollister Field Office  
20 Hamilton Court  
Hollister CA, 95023

Dear Mr.Rick Cooper,

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek.

This is enough to envoke a valid Cause of Action against the State for unlawful closure of land for public use.

Sincerely,

Sebastian Ubillos  
299 hidden lake dr  
sunnyvale CA 94089



sepnufer@live.com  
02/26/2010 02:16 PM

To "Rick Cooper" <cahormp@ca.blm.gov>  
cc sepnufer@live.com  
bcc  
Subject Comments on Clear Creek DEIS

Date: 2/26/2010 Hollister BLM Mr. Rick Cooper Bureau of Land Management, Hollister Field Office 20 Hamilton Court Hollister CA, 95023 Dear Mr. Rick Cooper,  
Dear BLM Staff,

Just close Clear Creek already. The last meeting that I attended at the Santa Clara Convention center convinced me that the BLM has already made it decision to restrict all public access to the CCMA.

All this letter writing is a waste of time.

It gauls me to no end that my tax dollars support the BLM.

Thank you,

Joseph S. Nufer

Sincerely, Joseph Nufer 3498 Cabrillo Avenue Santa Clara CA 95051



Sky  
Murphy/CASO/CA/BLM/DOI  
04/20/2010 10:40 AM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

--- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 04/20/2010 10:40 AM ---



jginsj@yahoo.com

04/19/2010 04:37 PM

Please respond to  
jginsj@yahoo.com

To smurphy@blm.gov, mwest@ca.blm.gov

cc

Subject hollister feedback

name = John Grinager  
organization =  
email = jginsj@yahoo.com  
subject = Clear Creek Closure  
FeedbackType = Comment  
request\_comment = Please apply massive doses of common sense to the issue of closing Clear Creek to OHV enthusiasts. I've been attending these and similar meetings regarding this subject for about 20 years now. It is very disheartening to go through this over and over...realistically, what are the compelling reasons for the closure? Asbestos poisoning? Where are the thousands who have dropped dead after all of these decades?   
Protecting the environment? Clear Creek looks the same to me as it has for 25 years that I've been enjoying it, hasn't really been destroyed much.  
Preserving resources? Please specify which resources we have depleted by enjoying this wonderful recreation area.  
Protecting wildlife? Please specify which species have been endangered and provide the empirical evidence.  
  
Seriously, this is a great, big, wonderful playground that has been enjoyed by countless thousands for many decades. Why would we take this away from the public that just wants to enjoy it? I really, really just do not get it. Please help. Please.  
  
Thanks,  
John Grinager  
username123 =  
sentinal = Sentinal  
page\_referred\_from =  
<http://www.southbayriders.com/forums/showthread.php?t=94456>  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
04/19/2010 12:32 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 04/19/2010 12:32 PM -----



momagna@yahoo.com

04/19/2010 12:28 PM

Please respond to  
momagna@yahoo.com

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Dee Murphy  
organization =  
email = momagna@yahoo.com  
subject = CCMA Clear Creek Management Area  
FeedbackType = Comment  
request\_comment = I am in full favor of the BLM RE\_OPENING the Clear Creek Management Area for the PUBLIC'S USE. It is unfair that the BLM has closed the Public Lands FROM the people who paid for them and want to use them. <br><br>The scientific data used to show the chrysotile in CCMA is not able to locate or show ANYONE who has become sick or succumbed to any asbestos cancers. The statics in the DEIS has been greatly shown to have been faulty. The closure of CCMA was to have been temporary but I nor anyone else can believe that temporary is now 2 YEARS LONG, Temporary is for a short time span.<br><br>The BLM tried to convince the county that the roads should stay closed but the tax payers went to bat for the county and stated that the roads should and must be opened. The BLM has taken away Kettleman City for OHV use and has taken away CCMA for EVERYONE'S use, even excluding land owners from accessing their own lands. This is JUST not how the BLM should work. The BLM should be working to open MORE land for the people NOT taking away land from the PEOPLE.<br><br>Please reconsider the opening of Clear Creek Management Area. The actual monetary loss to ALL of the businesses in San Benito County has been estimated as a loss of OVER \$2.2 MILLION DOLLARS, numerous people have been laid off and businesses have or will be closed because of this temporary closure. The losses to all of the other close counties were NOT even listed in the DEIS as was stated at the February 22, 2010 Economic Impact Meeting at San Juan Oaks. The BLM just invited 21 &#40;YES!!! 21&#41; businesses that might have been impacted forgetting all about the actual businesses in Hollister that sell gas, food and supplies. Rick Cooper said he left it up to the Chamber of Commerce to do his job of notifying everyone about the meeting and that is just shameless on his part.<br><br>If there are no real cases of asbestos cancers in CCMA and the asbestos has been shown by the BLM to be in actuality almost ZERO parts then why is it that CCMA is still closed? Your own e&#45;mails from BLM people to other BLM people PROVE this fact. All of this should have the BLM opening up the CCMA for use ALL YEAR LONG.. Being a rider with a job and the ability to make a sound decision

should be enough to prove that I can make the right decisions for my family and I to know that we can SAFELY ride at CCMA and love doing so. I have been going there for over 22 years and know of others that have spent since the 1960's there with NO ILL EFFECTS. <br><br>PLEASE RE\_OPEN THE CLEAR CREEK MANAGEMENT AREA for the PUBLIC.<br><br>Thank You, Dee Murphy

username123 =

sentinal = Sentinal

page\_referred\_from = <http://www.blm.gov/ca/st/en/fo/hollister.html>

fo = 10

Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
04/06/2010 12:48 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

— Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 04/06/2010 12:48 PM —



dbonvicin@sbcglobal.net

04/05/2010 09:13 PM

Please respond to  
dbonvicin@sbcglobal.net

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = david bonvicin  
organization =  
email = dbonvicin@sbcglobal.net  
subject = keep clear creek open  
FeedbackType = Comment  
request\_comment = i strongly believe that we need to keep our existing ohv  
areas open.<br>we only have so many places to ride as it is.<br>close clear  
creek and we just send more into illegal forests to ride.<br>thanks dave  
username123 =  
sentinal = Sentinel  
page\_referred\_from = http://www.blm.gov/ca/st/en/fo/hollister.html  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
04/06/2010 12:42 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 04/06/2010 12:42 PM -----



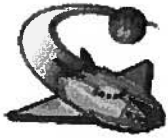
m.hartsell@sbcglobal.net

04/04/2010 03:53 PM

Please respond to  
m.hartsell@sbcglobal.net

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Mark Hartsell  
organization =  
email = m.hartsell@sbcglobal.net  
subject = Clear Creek Closure  
FeedbackType = Comment  
request\_comment = I have gone to clear creek to ride as long as i can  
remember... It is very important to have places for off road motorcycles and  
recreational activity... I do not suffer from any health problems of any  
kind... We must have land like this for this kind of usage.... Can we please  
have some common sense reasoning... Thanks, Mark  
username123 =  
sentinal = Sentinal  
page\_referred\_from = http://www.blm.gov/ca/st/en/fo/hollister.html  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
03/05/2010 09:27 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/05/2010 09:27 AM -----



mudflappus@yahoo.com

03/04/2010 03:53 PM

Please respond to  
mudflappus@yahoo.com

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Neil Schmidt  
organization =  
email = mudflappus@yahoo.com  
subject = RE: CCMA EIS  
FeedbackType = Comment

request\_comment = <br>Dear Mr. Rick Cooper, <br><br>In order to establish the context of my comments I would like to state that I am an avid dirt biker who learned how to ride motorcycles in the Clear Creek Management Area. &#40;CCMA&#41; Over the last thirty years I can look back on many fond memories of friends and family recreating as well as assisting in the operations of various two and four wheel events within its boundaries. It is from this perspective that I am demanding no less than the immediate reopening of the CCMA to pre Emergency Closure standards. My reasons are as follows:<br><br>By modifying the language of the initial EPA environmental exposure report, the BLM severely compromised the integrity of the report. Therefore any actions taken utilizing this report as guidance are flawed from the starting point. <br><br>By its own admission, the EPA's field tests were not properly administered as the BLM failed to disclose that the locations to be tested were

historical industrial dump sites. The results of the tests themselves are questionable as the EPA failed to track the location of the field agents collecting data to be used in the final report.<br><br>Even if testing results yielded valid information, the data still would not be applicable as it does not take into consideration the nature of exposure that visitors to the CCMA will experience on site. Forcing an industrial asbestos exposure model where it does not fit completely discredits EPA as well as the BLM as it simply appears that the current BLM agenda to close the CCMA must be afforded at all costs. People recreating in Clear Creek are not engaging in 40 hour work weeks there. If the health risks of prolonged exposure were actually more than politically correct posturing on the part of both the BLM and EPA, contingencies could easily be created to redress federal employees operating within the so called "Red Zones". <br><br>There is a total lack of physical evidence to support the actions of the BLM and this speaks louder than any study or claim made by the EPA regarding the environmental dangers associated with Clear Creek. To date, not one single report of illness or death has ever

been presented by any party within the pervue of this closure.<br><br>With the lack of a credible reason to sustain the continued closure of the Clear Creek Management Area, allow me to speak to the financial damage done to businesses both large and small in Monterey County, Fresno County, San Benito County and beyond. Motorcycle shops, restaurants, gas stations and supermarkets have all felt the impact of this closure and in a devastated economy, the closure may well sound the death knell of many honest American small businesses. This is a shameful legacy the BLM has not taken any interest in outside of the prerequisite public meetings that are required by law. <br><br>With the notable exception of Alternative "A", the BLM has failed to put fo

rth a suitable<br>remedy that does not either severely restrict or force a total prohibition of motorized recreation in the CCMA. This is contrary to the parks original chartered purpose.<br><br>The closure of Clear Creek has resulted in dangerous congestion of the very few remaining off road parks that remain open. Head on collisions are up and the ability<br>To maintain trails and paths is becoming difficult from over use. This is creating an unsustainable environment in which too many riders are confined in small spaces and the end result is physical injuries and damage to the trail systems in the parks themselves. <br><br>The EIS issued by the BLM is over Seven Hundred &#40;700&#41; pages in length and the BLM has attempted to rush the public comment period by denying requests for an extension of the public comment period. Given a document of its size and scope, the EIS can not be digested and understood in the short period of time that has been allowed for this pu

rpose. Once again, it appears that there is a sense of urgency on the part of the BLM to insure that dissenting opinions are not allowed to congeal and come forth. <br><br>In summation, I feel that Alternative "A" is the only suitable solution offered by the BLM at this point and it is the only alternative that I will support. The science behind the closure of the CCMA simply does not pass the litmus test of credibility and as such must be discarded as the basis for the Emergency Closure of the CCMA in the first place. I do <br>Not support the BLM in any form regarding this issue as I feel they have been less than forth coming with honest and pertinent facts regarding the CCMA. I must also convey my extreme displeasure at the news that the BLM is currently removing staging areas and camping sites before a final record of decision has even been reached. If I did not know any better, I would wager that the BLM has already reached a decision on the future of the CCMA and is

actively working to see that the park is never reopened. <br><br>The actions of the BLM have created the largest land closure in the history of the Continental United States. The notion that we as citizens must be saved from ourselves by Federal Agencies utilizing flawed science, public hysteria and outright untruths must not become precedent. If the BLM is allowed to continue its present course &#40;against the will of all users of the CCMA&#41; Clear Creek itself will become no less than a forbidden family cemetery where memories of some of the finest moments in my life were created. <br><br>

Sincerely,

<br>Neil Schmidt 12260 Alp Cir <br>Salinas CA

username123 =

sentinal = Sentinal

page\_referred\_from = <http://www.blm.gov/ca/st/en/fo/hollister.html>

fo = 10

Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
03/03/2010 12:59 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Painter Murphy/CASO/CA/BLM/DOI on 03/03/2010 12:58 PM -----



leaverite@gmail.com

03/03/2010 11:33 AM

Please respond to  
leaverite@gmail.com

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Jim Bean  
organization =  
email = leaverite@gmail.com  
subject = Closure of CCMA  
FeedbackType = Comment  
request\_comment = I would like to express my desire to have the Clear Creek Management area kept open for limited recreational use. I believe the studies used as a basis for closure are flawed in that they only take maximum exposure into account. No recreational users or management personnel have ever been diagnosed with any asbestos-related diseases. OHV use, which does have significant impact, asbestos aside could be relocated to nearby areas outside the area of elevated asbestos. Other recreational activities such as hunting, rockhounding, birdwatching and hiking have a much more minimal impact.  
<br>Blanket closure is a poor answer to the management of this area.<br>I believe the time for public comment has been too restrictive as well and should be extended.<br><br>Jim Bean  
username123 =  
sentinal = Sentinal  
page\_referred\_from = http://www.blm.gov/ca/st/en/fo/hollister.html  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
03/03/2010 10:18 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: CCMA RMP

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

--- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/03/2010 10:17 AM ---



Jeffrey R  
<jjeffrey\_r@hotmail.com>  
03/02/2010 05:29 PM

To <caho\_rmp@ca.blm.gov>  
cc <sky\_murphy@ca.blm.gov>  
Subject CCMA RMP

I am resending this letter to make sure that it arrives in time. The email address referenced is different from the published contact information. I apologize if this is a duplicate. Please forward my comments to appropriate administrator. Thank you.

Date: 3/2/2010

Hollister BLM  
Bureau of Land Management, Hollister Field Office  
20 Hamilton Court  
Hollister CA, 95023

Dear Sir/Madam,

The report filed by the BLM is based on an EPA study originating from mostly theoretical analysis of potential asbestos exposure hazards. Yet, despite 50 or more years of use, there have been no documented cases of any asbestos related health problems, correlated with recreational exposure at Clear Creek. The BLM and EPA must not reference reports/studies that are clearly not supported by actual and verifiable health cases at Clear Creek. It is an absolute fact that there are no cases of illness associated with the use of the CCMA.

OHV recreation has clearly been the predominant activity by past visitors at the Clear Creek Management Area over the last several decades. Sadly, the BLM's preferred alternative selection, makes no provisions for OHV use at all. This represents a complete reversal of the current and historical use in the CCMA. Selection of a preferred alternative must include at least SOME OHV use provisions. Preferably, selection criteria would give emphasis to public travel on trails and roads as opposed to eliminating it completely.

Vast acreages of BLM land directly adjacent to the Clear Creek Management Area, suitable for OHV recreation, could potentially be opened. Omission of such an alternative in the DEIS completely ignores the thousands of users who are crying out for a suitable place to recreate responsibly in their chosen pastime.

It is virtually impossible to travel in the CCMA without some form of motorized transportation. The terrain is rugged and forbidding with numerous elevation changes. Due to health issues, many users would effectively be locked-out of access, without a provision for motorized travel. Public lands administered by the BLM, must remain accessible to all users, especially those who are unable to hike/walk for hours on end. Rock hunting, camping, bird watching, etc., would be impossible for disabled or otherwise "less than fit" members of the public, without motorized access. OHV use, especially quad, jeep or dirt bike, leaves the smallest footprint, especially when that use is restricted to established trails/roads. Horse back riding is simply not practical for most people, considering the cost, difficulty and strenuous nature of climbing aboard a large animal. Concern for our disabled veterans, elderly, obese and chronically ill members of the public must be represented in the BLM's choice of preferred alternatives. Anything less, is a form of discrimination.

Sincerely,

Jeff Robeson  
15087 Stratford Dr.  
San Jose CA 95124

---

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Sky  
Murphy/CASO/CA/BLM/DOI  
03/02/2010 09:07 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

--- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/02/2010 09:06 AM ---



ntrms1@sbcglobal.net

03/01/2010 06:42 PM

Please respond to  
ntrms1@sbcglobal.net

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Robert Piper  
organization =  
email = ntrms1@sbcglobal.net  
subject = Clear Creek Management Area proposed closure  
FeedbackType = Comment  
request\_comment = I am writing to voice my opposition to closure of the Clear Creek Management Area. There is a shortage of OHV riding areas in northern California. To close CCMA would be to concentrate usage in the other areas. Many taxpayers want & need more places to participate in OHV recreation. CCMA is one of the best, and it would be a horrible injustice for the BLM to use faulty science to justify the closure. <br>The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to consider the vastly lesser exposure of recreational visitors compared to the studies daily workplace exposure. <br><br><br>The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek. <br><br>Please consider not taking away another wonderful place that I love to enjoy. Thank you  
username123 =  
sentinal = Sentinal  
page\_referred\_from =  
[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area.html)  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
03/01/2010 01:20 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

--- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/01/2010 01:20 PM ---



mfroese@sbcglobal.net

02/27/2010 10:26 AM

Please respond to  
mfroese@sbcglobal.net

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Mary Lou Froese  
organization =  
email = mfroese@sbcglobal.net  
subject = closing of Clear Creek  
FeedbackType = Comment  
request\_comment = I belong to two rockhound clubs: San Francisco Gem and Mineral Society, and the Sequoia Gem and Mineral Society. It has come to my attention that you intend to close the Clear Creek area because of "asbestos" in the area. Also found in the area are rocks that are Serpentine, as well as other minerals. Rockhounds have been going to the area for years and banning the area because of only one suspect mineral is not reasonable. Benitoite, which is a rare mineral, is found in only this area, and is mentioned in several Rock books. This is an important area for collecting and studying our earth and I hope you reconsider your thoughts in this manner and allow access to this area for future use.  
username123 =  
sentinal = Sentinal  
page\_referred\_from = <http://www.blm.gov/ca/st/en/fo/hollister.html>  
fo = 10  
Submit = Send Request



**Sky  
Murphy/CASO/CA/BLM/DOI**  
03/01/2010 01:19 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Clear Creek

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

— Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/01/2010 01:18 PM —



**Rick  
Cooper/CASO/CA/BLM/DOI**  
02/26/2010 09:16 PM

To "Sky Murphy" <Sky\_Murphy@ca.blm.gov>  
cc  
Subject Fw: Clear Creek

#### Comment

---

**From:** "Nick Rizzi" [nick@ttmcommunications.com]  
**Sent:** 02/25/2010 11:31 AM PST  
**To:** Rick Cooper  
**Subject:** Clear Creek

Hi Rick,

I wanted to share how unfair I believe it is to close Clear Creek for ever. Public Lands are important to our History.

Regards,

Nick Rizzi

TTM Communications, Inc.,

16200 Vineyard Blvd., Suite 100

Morgan Hill, Ca. 95037

Office - 408-626-9581

fax - 408-500-3989

cell - 408-646-2059

[www.ttmcommunications.com](http://www.ttmcommunications.com)\* [www.thetelephoneman.com](http://www.thetelephoneman.com)

**TTM** is a service orientated provider of high quality communications products based in the Silicon Valley. TTM will provide a single source solution for all Telecom/Networking Systems and cable infrastructures. TTM will provide a unique product through education and experience while developing relationships with devotion to our customers.



**Sky  
Murphy/CASO/CA/BLM/DOI**  
03/01/2010 01:18 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Do not close ClearCreek

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/01/2010 01:17 PM -----



**Rick  
Cooper/CASO/CA/BLM/DOI**  
02/26/2010 03:23 PM

To "Sky Murphy" <Sky\_Murphy@ca.blm.gov>  
cc  
Subject Fw: Do not close ClearCreek

Comment

---

**From:** "Bob Bishop" [2bbishop@sbcglobal.net]  
**Sent:** 02/26/2010 12:26 PM PST  
**To:** Rick Cooper  
**Subject:** Do not close ClearCreek

Resources should be set aside to insure this park stay open to the public for OHV use.

Bob Bishop



Sky  
Murphy/CASO/CA/BLM/DOI  
03/01/2010 01:15 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: We have fun out there

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/01/2010 01:15 PM -----



Rick  
Cooper/CASO/CA/BLM/DOI  
02/25/2010 09:26 AM

To Sky Murphy/CASO/CA/BLM/DOI@BLM  
cc  
Subject Fw: We have fun out there

#### Comments

Rick Cooper  
Field Manager  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
phone: (831) 630-5010

----- Forwarded by Rick Cooper/CASO/CA/BLM/DOI on 02/25/2010 09:26 AM -----



"Leslie Marquette"  
<lester2@worldnet.att.net>  
02/24/2010 08:34 PM

To <rick\_cooper@ca.blm.gov>  
cc  
Subject We have fun out there

Open it all back up



Sky  
Murphy/CASO/CA/BLM/DOI  
03/01/2010 01:14 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Clear creek

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 03/01/2010 01:14 PM -----



Rick  
Cooper/CASO/CA/BLM/DOI  
02/25/2010 09:22 AM

To Sky Murphy/CASO/CA/BLM/DOI@BLM  
cc  
Subject Fw: Clear creek

Public comment

Rick Cooper  
Field Manager  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
phone: (831) 630-5010

----- Forwarded by Rick Cooper/CASO/CA/BLM/DOI on 02/25/2010 09:22 AM -----



pismo1327@sbcglobal.net  
02/24/2010 07:16 PM

Please respond to  
pismo1327@sbcglobal.net

To rick\_cooper@ca.blm.gov  
cc  
Subject Clear creek

Please release the clear creek paper work it needs to be reopened to the public. It is hurting the local economie and the over state budget  
Sent from my Verizon Wireless BlackBerry



Sky  
Murphy/CASO/CA/BLM/DOI  
02/22/2010 09:14 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Clear Creek Access

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 02/22/2010 09:14 AM -----



Rick  
Cooper/CASO/CA/BLM/DOI  
02/20/2010 03:08 PM

To Sky Murphy/CASO/CA/BLM/DOI@BLM  
cc  
Subject Fw: Clear Creek Access

#### Comments

Rick Cooper  
Field Manager  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
phone: (831) 630-5010

----- Forwarded by Rick Cooper/CASO/CA/BLM/DOI on 02/20/2010 03:08 PM -----

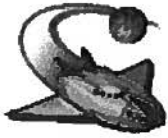


Lhug59larry@aol.com  
02/20/2010 01:28 PM

To rick\_cooper@ca.blm.gov, Kathryn\_Hardy@blm.gov,  
Jim\_Abbott@blm.gov, Robert\_Abbey@blm.gov  
cc  
Subject Clear Creek Access

Please do not impose any more use restrictions on our public land and restore public access to the Clear creek area. The new proposed restrictions are a slap in the face to the hard working American families that have paid for & enjoyed these public lands for generations. With the expanding population of people wanting access to their public lands , closing or restricting access just increases the overuse of the few areas that remain open. The American public needs more access, not less. The majority of us also do not require any new structures, signs, parking lots, roads or improvements, we just want sensible access to our lands.

Howard L Hughes  
10310 rolling hills drive  
Madera CA  
93638



**Sky  
Murphy/CASO/CA/BLM/DOI**  
02/16/2010 10:54 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Internet Inquiry

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 02/16/2010 10:54 AM -----



**Rick  
Cooper/CASO/CA/BLM/DOI**  
02/16/2010 07:54 AM

To Steve Kupferman/CASO/CA/BLM/DOI@BLM  
cc capubrm@ca.blm.gov, Sky  
Murphy/CASO/CA/BLM/DOI@BLM  
Subject Re: Fw: Internet Inquiry

Steve,

Thanks for forwarding. All comments on the Draft RMP/EIS for Clear Creek Management Area received in public room can be forwarded to Sky Murphy and cc Rick Cooper.

Rick Cooper  
Field Manager  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
phone: (831) 630-5010  
Steve Kupferman/CASO/CA/BLM/DOI



**Steve  
Kupferman/CASO/CA/BLM/D  
OI**  
02/16/2010 07:44 AM

To Rick Cooper/CASO/CA/BLM/DOI@BLM  
cc capubrm@ca.blm.gov  
Subject Fw: Internet Inquiry

Hi Rick....As mentioned in my voice mail here is a public comment on the Clear Creek DEIS. I assume that you will respond accordingly....

Thanks....Steve

*Steve Kupferman  
Geologist, Mineral Materials Program Lead, Acting Deputy State Director, Energy and Minerals  
Bureau of Land Management  
California State Office  
2800 Cottage Way, W-1834  
Sacramento, CA 95825*

916-978-4383

----- Forwarded by Steve Kupferman/CASO/CA/BLM/DOI on 02/16/2010 07:30 AM -----

**CA CASO Public Room**

Sent by: Viola Hunting

02/12/2010 04:16 PM

To [espenergy@yahoo.com](mailto:espenergy@yahoo.com)

cc Steve Kupferman/CASO/CA/BLM/DOI@BLM

Subject Re: Fw: Internet Inquiry 

Hello Jeff,

I am forwarding your email to Steve Kupferman, our State Office Geologist, as your point of contact, and he will respond to your email at his convenience, or forward your email to someone who will respond to your email.

Steve, please cc "[capubrm@ca.blm.gov](mailto:capubrm@ca.blm.gov)" your response for our records.

Sincerely,

Viola Hunting

Allison E Sandoval/WO/BLM/DOI



**Allison E  
Sandoval/WO/BLM/DOI**

02/12/2010 07:12 AM

To [capubrm@ca.blm.gov](mailto:capubrm@ca.blm.gov), [mwest@ca.blm.gov](mailto:mwest@ca.blm.gov)

cc

Subject Fw: Internet Inquiry

Please reply to: [espenergy@yahoo.com](mailto:espenergy@yahoo.com)

----- Forwarded by Allison E Sandoval/WO/BLM/DOI on 02/12/2010 10:11 AM -----



[cq@blm.gov](mailto:cq@blm.gov)

02/09/2010 05:25 PM

To [woinfo@blm.gov](mailto:woinfo@blm.gov)

cc

Subject Internet Inquiry

Name0 = (0: 'Jeff Robinson')  
EmailAddress = (0: 'espenergy@yahoo.com')  
TypeofContact = (0: 'Question/Comment About BLM or its Programs/Services (i.e. maps, land records, mining claims, recreation, permits, oil and gas sales, etc)')  
Message = (0: 'Comment on Clear Creek DEIS, Hollister Field Office-

The BLM used an EPA report is based on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer

or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek.

The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to reconsider projected exposure levels for recreational visitors, as compared to studies of occupational workplace exposure.

There are no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. BLM employees spend more time in the area than recreational visitors. If employees are not experiencing health related asbestos issues then there must not be any real health risk.

Actual health risks are much lower than those estimated in the CCMA assessment since the area doesn't have the same exposure levels as studied in occupational examples. The DEIS must consider the uncertainty rather than using worst case scenarios.

The EPA report is flawed and should not be relied upon for the agency's decision to enact a closure of the CCMA to all public use.

Thank you,  
A concerned citizen.')



Sky  
Murphy/CASO/CA/BLM/DOI  
02/02/2010 04:19 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Re:

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 02/02/2010 04:19 PM -----



Timothy  
Moore/CASO/CA/BLM/DOI  
02/01/2010 10:03 AM

To Sky Murphy/CASO/CA/BLM/DOI@BLM, Rick  
Cooper/CASO/CA/BLM/DOI@BLM, George  
Hill/CASO/CA/BLM/DOI@BLM  
cc  
Subject Fw: Re:

fyi

----- Forwarded by Timothy Moore/CASO/CA/BLM/DOI on 02/01/2010 10:02 AM -----



Hans Thern  
<califminco@yahoo.com>  
01/22/2010 02:48 PM

To Timothy\_Moore@ca.blm.gov  
cc  
Subject Re:

Hi Timothy, I couldn't get form to download perhaps if you could mail one to Hans Thern, PO Box 355, Rescue, CA 95672. I couldn't go to the meeting because it is about 300 miles. I would like to express my feelings as a Geologist with 3 degree's and have been collecting minerals in the Clear creek area since I graduated high school in Danville CA in 1977. Makes me 50+ years old now collecting jade and gems and minerals for 33 years there. What I would like is unrestricted access to where I have been going for the past 33 years without having to fill out forms and pay more money. I don't understand the closure legal formalities I am a field geologist. I have many physical ailments but luckely so far my lungs are strong partly due to hiking and packing out rocks in the clean mountain air and swimming in the streams. I do see an issue with the installment of multiple staging area's designed to promote ohv use and then subsequently denying that use to the public of public lands. I do believe that the dust is potentially harmful and people should not breath dirt. The children should be protected and aware of the hazards. The dirt bikers are a nuisance to me during my mineral collecting and I don't like their presense but I believe they have there rights to access. I belong to the Calaveras gem and mineral society and we must all adhere to a code of ethic's for mineral collecting. So please do what you will but let me do what I do best, collect, process and beautify peoples lives with gems. I do 40 trade shows a year, been selling as California Mineral

Company since 1982 and power seller on ebay, Doing my job to promote the economy and generate out of state dollars. So I would appreciate a special use permit or some type of unrestricted access permit.would be my ideal situation, Thanks !!! Hans

--- On Wed, 1/20/10, Timothy\_Moore@ca.blm.gov <Timothy\_Moore@ca.blm.gov> wrote:

From: Timothy\_Moore@ca.blm.gov <Timothy\_Moore@ca.blm.gov>

Subject:

To: califminco@yahoo.com

Date: Wednesday, January 20, 2010, 1:01 PM

test



Sky  
Murphy/CASO/CA/BLM/DOI  
01/29/2010 10:00 AM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 01/29/2010 09:59 AM -----



mkwdbdr@aol.com  
01/28/2010 06:47 PM

To Sky\_Murphy@ca.blm.gov  
cc

Subject Re: hollister feedback

Hello Sky,

Thank you for the timely reply. I was doing some research and found several real studies done with complete references of these studies. I do hope those studies are taken into account. Also I found that the ERPA's projections are way out of wack in those cases. If it was a different type of asbestos, it would be harmful, but this specific type. So again thank you for the timely reply, and adding me to the list. hopefully a common goal can be reached.

Sincerely,  
Michael Boudier!

-----Original Message-----

From: Sky\_Murphy@ca.blm.gov  
To: cahormp@ca.blm.gov  
Cc: mkwdbdr@aol.com  
Sent: Thu, Jan 28, 2010 2:09 pm  
Subject: Fw: hollister feedback

Dear Mike,

Thanks for the comments. I will submit them into the public record of comments on the Draft RMP/EIS. All comments on the Draft RMP/EIS received by BLM will be published in the Proposed RMP and Final EIS with an official response from BLM. The Proposed RMP/FEIS is anticipated to be released late-Summer/early-Fall.

Following the release of the Proposed RMP/FEIS there will be a 30-day public protest period. Once all the protests are resolved, then a Record of Decision for the CCMA RMP will be approved.

As stated in the temporary closure order, the 31,000-acre Serpentine ACEC will remain closed until the Record of Decision is approved.

I will also add you to the CCMA RMP mail list and the Fort Ord mail list.

regards,

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 01/28/2010 01:23 PM -----

[mkwdbdr@aol.com](mailto:mkwdbdr@aol.com)

01/27/2010 11:24  
PM

[Sky\\_Murphy@ca.blm.gov](mailto:Sky_Murphy@ca.blm.gov)

To

cc

Subject

Re: hollister feedback

Hello Sky,

I have read the report that closed Clear Creek. Who are the victims of that place? How are there familys living around there that have not been effected? The dirt won't change. According to the Federal Government, unprocessed espstose can not harm, nor endanger any one. I could under stand if it uranium, or some radio active, but its not. The report actually stated the levels, and they are low enough. So whats the hold up? Soil samples cant change that drastically in a matter of over a year and a half. The people were told it would be closed for two years, does that meen it will be open in May?

Victoms of nemponiliom from Clear Creek really exist? It wasn't from some place they worked, or a school they went to? I have worked in the trades almost my entire life, and I have seen more espestose in schools, public buildings government offices, and Hospitals. Thats the bad stuff, processed. If the victoms lived near Moss Land it could be from the power plant. That place had it floating, and being knocked around since it was built.

Okay, I am sorry, I started to get off track. How many cases have actually been related to Clear Creek, New Idria area. or can it be proved? It can't.

Okay, next subject, Fort Ord. Bicycles, and horses are okay, but putting a track, or a section a side for riders wouldn't work? All of the explosives are in a contained area. Wouldn't it be cool if the cleared area around Leguna Seca could be used for motorized cycles?With a fee in place, it would create revinue, and attract our youth , and give them something to do. I grew up having ther hills of Prunedale to ride in with out a problem. The generation befor eme did as well. Those guys had no real problems, minus the drunks, and a few vetnom vets the had drug issues, but it gave us an outlet, and some thing constructive to do with our time. Kids now

days don't have that, just better vidoe games and better t.v. to watch.

I guess my total point is, please stop take what little we have to do away. if its posted that possibly this could happen, fine. Let the public make there own decisions, and give some of our tax paying privilegdes back. If we want to smoke, ride, eat dirt, or what have you, lets do it on our own, not with soem one dictating what we can do.

Sorry if it seems like I am being an ass. I just want somwe answers. I don't meen it towards you. by the way, I like your name, sounds Irish!!

I would like to be added to your mailing list, and furhter developments on both areas.

Michael W Boudier  
18 Springpoint Rd  
Castroville CA 95012

-----Original Message-----

From: [Sky\\_Murphy@ca.blm.gov](mailto:Sky_Murphy@ca.blm.gov)To: [mkwdbdr@aol.com](mailto:mkwdbdr@aol.com)Sent: Tue, Jan 26, 2010 11:25 am  
Subject: Re: hollister feedback

Mr. Boudier,

Thank you for your inquiry regarding the Clear Creek Management Area (CCMA).

Currently, 31,000 acres within the CCMA is under a temporary closure and no public access is allowed on the designated routes in the closed area.

The temporary closure will remain in effect until a new Record of Decision for the CCMA Resource Management Plan and Environmental Impact Statement is complete.

The temporary closure was issued in response to the results of the CCMA Asbestos Exposure and Human Health Risk Assessment released by EPA on May 1, 2008, which determined the asbestos exposures measured by EPA for many recreational activities at CCMA exceed the acceptable risk range for carcinogens. The EPA maintains a website (linked below) with more information on the CCMA Asbestos Exposure and Human Health Risk Assessment:

<http://www.epa.gov/region09/toxic/noa/clearcreek/index.html>

Over the past 18 months, BLM has been preparing a Draft Resource Management Plan and Environmental Impact Statement to guide the long-term management of public lands within the CCMA. The Hollister Field Office maintains a website (linked below) with more information on the CCMA land use planning process, and the Draft CCMA RMP/EIS is now available on this website:

[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area/CCMA\\_RMP.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area/CCMA_RMP.html)

If you would like more information about the CCMA and the associated Draft RMP/EIS, please call me at the number below.

If you would like to be added to our CCMA RMP/EIS mail list, please send a request with your name and mailing address.

Comments and questions regarding BLM-managed lands on the former Fort Ord are also welcome, but please have some courtesy with respect to the

victims of tragedies that occurred in the area.

Sincerely,

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

mkwdbdr@aol.com

01/25/2010 04:25  
PM

To  
smurphy@blm.gov, mwest@ca.blm.gov  
cc

Please respond to  
mkwdbdr@aol.com

hollister feedback

Subject

name = Michael Boudier  
organization =  
email = mkwdbdr@aol.comsubject = Clear creek  
FeedbackType = General Question  
request\_comment = Hi, how can I get a copy of the current report regarding  
Clear Creek, and some facts, and figures? Is there a EPA report that has  
been done recently? What else can you tell me about it? I have not yet seen  
a publication, and I am tired of reading about how dishonest the BLM is.  
<br> Also, what is going to happen to the old Fort Ord BLM land? I would  
like to know, do to the fact that the land there could be put to good use. If  
bubs can make camp back there, and dead girls can be dropped off out there,  
wouldn't make cents to open the land up to all.  
username123 =  
sentinal = Sentinal  
page\_referred\_from =  
http://www.blm.gov/ca/st/en/fo/hollister/clear\_creek\_management\_area/CCMA\_Clos  
ure\_FAQ.htmlfo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
01/28/2010 02:14 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

— Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 01/28/2010 02:14 PM —



mkwdbdr@aol.com  
01/28/2010 12:12 AM

To Sky\_Murphy@ca.blm.gov  
cc  
Subject Re: hollister feedback

I forgot to ad this little find from the New England Journal of Medician,

## ABSTRACT

*Background* Heavy industrial exposure to asbestos causes lung cancer and mesothelioma, but it remains unknown whether much lower environmental exposure to asbestos also causes these cancers. Nevertheless, regulatory agencies, including the Environmental Protection Agency (EPA), have assessed the risk of lung cancer by extrapolating known risks from past industrial exposure to asbestos to today's much lower environmental asbestos levels (roughly 100,000 times lower). We also tested the EPA's model for predicting the risk of asbestos-induced lung cancer in a population of women with relatively high levels of nonoccupational exposure to asbestos.

*Methods* Mortality among women in 2 chrysotile-asbestos–mining areas of the province of Quebec was compared with mortality among women in 60 control areas, and age-standardized mortality ratios were derived. With the help of an expert panel, we estimated past exposure to asbestos among women in the mining areas and used these data with the EPA's model to predict the relative risk of lung cancer. We then compared this prediction with the observed mortality ratios.

*Results* On the basis of the estimated exposure in the asbestos-mining areas, a relative risk of death due to lung cancer of 2.1 was predicted by the EPA's model, amounting to about 75 excess deaths from lung cancer in this population. By contrast, we calculated a standardized mortality ratio of 1.0 and a standardized proportionate mortality ratio of 1.1 ( $P>0.05$ ), suggesting that there were between 0 and 6.5 excess deaths from lung cancer among the women with nonoccupational

exposure to asbestos. Seven deaths from pleural cancer were observed (relative risk, 7.63;  $P < 0.05$ ).

*Conclusions* We found no measurable excess risk of death due to lung cancer among women in two chrysotile-asbestos-mining regions. The EPA's model overestimated the risk of asbestos-induced lung cancer by at least a factor of 10.

### Source Information

From the Unit of Epidemiology and Biostatistics, Institut Armand-Frappier, University of Quebec, Laval, Que. (M.C., J.S.); the Department of Epidemiology and Biostatistics, McGill University, Montreal (M.C., J.S.); and the Environmental Health Center, Health Canada, Ottawa, Ont. (M.C., B.M.).  
Address reprint requests to Dr. Camus at the Institut Armand-Frappier, 531 Boul. des Prairies, Laval, QC H7V 4Z3, Canada.

-----Original Message-----

From: Sky\_Murphy@ca.blm.gov  
To: mkwdbdr@aol.com  
Sent: Tue, Jan 26, 2010 11:25 am  
Subject: Re: hollister feedback

Mr. Boudier,

Thank you for your inquiry regarding the Clear Creek Management Area (CCMA).

Currently, 31,000 acres within the CCMA is under a temporary closure and no public access is allowed on the designated routes in the closed area.

The temporary closure will remain in effect until a new Record of Decision for the CCMA Resource Management Plan and Environmental Impact Statement is complete.

The temporary closure was issued in response to the results of the CCMA Asbestos Exposure and Human Health Risk Assessment released by EPA on May 1, 2008, which determined the asbestos exposures measured by EPA for many recreational activities at CCMA exceed the acceptable risk range for carcinogens. The EPA maintains a website (linked below) with more information on the CCMA Asbestos Exposure and Human Health Risk Assessment:

<http://www.epa.gov/region09/toxic/noa/clearcreek/index.html>

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[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area/CCMA\\_RMP.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area/CCMA_RMP.html)

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If you would like to be added to our CCMA RMP/EIS mail list, please send a request with your name and mailing address.

Comments and questions regarding BLM-managed lands on the former Fort Ord are also welcome, but please have some courtesy with respect to the victims of tragedies that occurred in the area.

Sincerely,

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

mkwdbdr@aol.com

01/25/2010 04:25  
PM

To  
smurphy@blm.gov, mwest@ca.blm.gov  
cc

Please respond to  
mkwdbdr@aol.com

hollister feedback

Subject

name = Michael Boudier  
organization =  
email = mkwdbdr@aol.comsubject = Clear creek  
FeedbackType = General Question  
request\_comment = Hi, how can I get a copy of the current report regarding Clear Creek, and some facts, and figures? Is there a EPA report that has been done recently? What else can you tell me about it? I have not yet seen a publication, and I am tired of reading about how dishonest the BLM is.  
<br> Also, what is going to happen to the old Fort Ord BLM land? I would like to know, do to the fact that the land there could be put to good use. If bubs can make camp back there, and dead girls can be dropped off out there, wouldn't make cents to open the land up to all.  
username123 =  
sentinal = Sentinal  
page\_referred\_from =  
[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area/CCMA\\_Closure\\_FAQ.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area/CCMA_Closure_FAQ.html)fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
01/27/2010 09:46 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Reply draft

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 01/27/2010 09:46 AM -----



Rick  
Cooper/CASO/CA/BLM/DOI  
01/26/2010 05:31 PM

To joseph nufer <sepnufer@live.com>  
cc  
Subject RE: Reply draft

Thanks for the information. I will pass your comment onto Sky Murphy and my Outdoor Rec Planner for consideration. I had not heard of that type tire. We will look into it.

Rick Cooper  
Field Manager  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
phone: (831) 630-5010  
joseph nufer <sepnufer@live.com>



joseph nufer  
<sepnufer@live.com>  
01/26/2010 04:00 PM

To <rick\_cooper@ca.blm.gov>  
cc  
Subject RE: Reply draft

Dear Mr. Cooper,

Thank you for responding to my email. I appreciate that you would take the time to do so.

One idea that I've never heard discussed during the Clear Creek debate, are tires.

By imposing a restriction on the type of tire used at Clear Creek the BLM could greatly reduce the impact of motorcycles there. I'm specifically talking about the use of trials type tires on the rear wheel. Trials tires use a soft compound low profile knobby. These tires are not made to spin, they use low pressure and greatly reduce impact.

It was just an idea.

Thanks again.

Joseph S. Nufer

> Subject: Reply draft  
> To: sepnufer@live.com  
> From: Rick\_Cooper@ca.blm.gov  
> Date: Fri, 22 Jan 2010 17:27:31 -0800

>  
>

> Dear sir,

>

> First I want to thank you for taking the time and interest to attend the  
> meeting and send me your concerns. There was certainly no intent to  
> intimidate any of the public attending BLM's public meeting. Hopefully the  
> officers provided some feeling of security for the public if any emergency  
> arose. All of the rangers are trained to deal with medical emergencies, as  
> well their law enforcement responsibilities. Three of the rangers were  
> from Hollister and it was important for them meet and have discussions with  
> public on law enforcement questions for the area. Our state lead ranger  
> was also in attendance as well.

>

> The Santa Clara Convention Center requires that meetings such as our public  
> meeting to have security. We can hire security through them or use our  
> own. Since many of the recreating public see our rangers in the field I  
> felt it appropriate to have them on site for all three of our public  
> meetings. It is an expense but it is part of doing business. The number  
> of rangers could be perceived excessive until there is actual emergency  
> where evacuation of 500 meeting participants is necessary for their safety.

>

> Again thanks for contacting me and if have further questions please email  
> again or call me.

>

>

>

> Rick Cooper  
> Field Manager  
> Hollister Field Office  
> 20 Hamilton Court  
> Hollister, CA 95023  
> phone: (831) 630-5010

>



Sky  
Murphy/CASO/CA/BLM/DOI  
01/21/2010 10:07 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 01/21/2010 10:06 AM -----



SLVcougar19@Gmail.com

01/20/2010 05:59 PM

Please respond to  
SLVcougar19@Gmail.com

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name =  
organization =  
email = SLVcougar19@Gmail.com  
subject = Clear Creek riding  
FeedbackType = Comment  
request\_comment = Open up clear creek for riding permanently! Us riders are  
running out of places to ride.  
username123 =  
sentinal = Sentinal  
page\_referred\_from =  
[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area.html)  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
12/29/2009 11:21 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 12/29/2009 11:21 AM -----



**dirk@cyclespecialties .com**

12/27/2009 01:28 PM


Please respond to  
dirk@cyclespecialties.com

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = dirk paintedman  
organization =  
email = dirk@cyclespecialties.com  
subject = clear creek  
FeedbackType = Comment  
request\_comment = wi would vote for plan b  
username123 =  
sentinal = Sentinal  
page\_referred\_from =  
[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area/CCMA\\_RMP.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area/CCMA_RMP.html)  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
12/29/2009 11:12 AM

To Onsiteatlanta@yahoo.com  
cc cahormp@ca.blm.gov  
bcc  
Subject Re: hollister feedback 

Dear Mr. Libby,

Thank you for your inquiry regarding the Clear Creek Management Area (CCMA).

Currently, 31,000 acres within the CCMA is under a temporary closure and no public access is allowed on the designated routes in the closed area.

The temporary closure will remain in effect until a new Record of Decision for the CCMA Resource Management Plan and Environmental Impact Statement is complete.

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<http://www.epa.gov/region09/toxic/noa/clearcreek/index.html>

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[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area/CCMA\\_RM\\_P.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area/CCMA_RM_P.html)

If you would like to be added to our CCMA RMP/EIS mail list, please send a request with your name and mailing address.

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039  
Onsiteatlanta@yahoo.com



[Onsiteatlanta@yahoo.com](mailto:Onsiteatlanta@yahoo.com)  
12/27/2009 08:27 AM

To smurphy@blm.gov, mwest@ca.blm.gov



Please respond to  
Onsiteinatlanta@yahoo.com

cc

Subject hollister feedback

name = George Libby  
organization =  
email = Onsiteinatlanta@yahoo.com  
subject = Clear Creek closings  
FeedbackType = General Question  
request\_comment = I do not understand why the area had to be closed. I used to live in the North East and when fishing we all knew to limit our consumption because of the mercury contamination of the fish. There was never a thought of not allowing any fishing and I can not understand why asbestos warnings would not be sufficient.  
username123 =  
sentinal = Sentinal  
page\_referred\_from = <http://www.blm.gov/ca/st/en/fo/hollister.html>  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
12/15/2009 11:58 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

--- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 12/15/2009 11:58 AM ---



jonctay@hotmail.com

12/13/2009 06:36 PM

Please respond to  
jonctay@hotmail.com

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Jon Taylor  
organization = Citizen  
email = jonctay@hotmail.com  
subject = Clear Creek Management Area  
FeedbackType = Comment

request\_comment = As part of the federal government the BLM should take the same course of action with the Clear Creek Management Area that it has with the tobacco industry. The EPA report used to get the temporary closure of Clear Creek was based on the health risk from activity at Clear Creek. Tobacco use has been linked to numerous health risks and what has the federal government done? They have not banned tobacco use. They have added a surgeon general's warning to the label and have educated the public on the risks associated with tobacco use. Each year more people die of the affects of tobacco use than from any activity at Clear Creek. The alternative which leaves Clear Creek as is and promotes educating the public on the risks of activity in the area is consistent with how the federal government handles tobacco. The biggest difference is that the tobacco industry has a bigger lobby and deeper pockets to line the governments pockets than the OHV industry will ever

have. There is another industry which should also show how this situation should be handled. Each year thousands of people are killed or injured from the effects of alcohol. How has the government handled this? They have not banned alcohol use. They have established limits on blood alcohol levels. How have they enforced this? They leave it up to the individual to decide when they have had enough. They do not physically track how much you are drinking they only enforce the rules after the fact. What about women who are pregnant and drink alcohol? The effects on the unborn child can be devastating. Do they ban drinking while you are pregnant? No, they attempt to educate the public on the effects of alcohol consumption while pregnant. Again, as with tobacco, the government benefits from the revenue generated from this industry. They too have deeper pockets than the OHV industry will ever have. What course of action should the BLM take? They should follow the sa

me pattern that has been set by the federal government. Educate the people on the risks associated with activity in the Clear Creek Management Area and let them decide if the risk is worth taking. Don't put a limit on how much

time can be spent in the area, let the individual decide when they have had enough. Please apply the same standards to the Clear Creek Management Area that federal government has applied to the tobacco and alcohol industry. Let us choose for ourselves. Let us ride.

username123 =

sentinal = Sentinal

page\_referred\_from =

[http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area.html)

fo = 10

Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
12/07/2009 10:30 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: hollister feedback

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 12/07/2009 10:30 AM -----



psbrown07@comcast.net

12/04/2009 05:00 PM

Please respond to  
psbrown07@comcast.net

To smurphy@blm.gov, mwest@ca.blm.gov  
cc  
Subject hollister feedback

name = Steve Brown  
organization =  
email = psbrown07@comcast.net  
subject = Clear Creek  
FeedbackType = Comment  
request\_comment = I have ridden motorcycles at Clear Creek since 1984. I am well aware of the asbestos problem and ride when the terrain is damp or wet and the dust is not a problem. Clear Creek should not be closed because someone else thinks it may be a health hazard! Our family of friends share my feelings and have always held Clear Creek as the Premier riding area in the State of California!!!<br>Don\&#39;t Shut It Down!!!!!!  
username123 =  
sentinal = Sentinal  
page\_referred\_from = <http://www.blm.gov/ca/st/en/fo/hollister.html>  
fo = 10  
Submit = Send Request



Sky  
Murphy/CASO/CA/BLM/DOI  
12/07/2009 09:25 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Fw: Notice of Availability: Clear Creek Management Area  
Draft RMP/EIS

Sky Painter Murphy  
BLM Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023  
(831) 630-5039

----- Forwarded by Sky Murphy/CASO/CA/BLM/DOI on 12/07/2009 09:25 AM -----



gluhed@aol.com  
12/04/2009 06:18 PM

To howardwaage@gmail.com, Sky\_Murphy@ca.blm.gov  
cc  
Subject Re: Notice of Availability: Clear Creek Management Area  
Draft RMP/EIS

hi sky-

thanks for the email notification. i am surprized your mailing list is not longer. i think all will agree with me when i say that i feel that the option the blm has chosen is not fair at all. it seems that the focus of the decision is on the ccma only and fails to account for the bigger picture. i will comment correctly, but i felt compelled to make my initial point:

for clarity i think it is important to distinguish between 'ohv' that encompasses all off road vehicles, and 'dirtbike' that is specific, like atv, utv, or suv.

ccma is dirtbike riders's graceland, we dirtbike riders enjoy the scenery just as much as anyone else, but ccma is not yosemite. all non-bike users of the ccma could go elsewhere for their recreation of choice, or continue to use the ccma seemingly without conflict. we 'bike' users have no alternative to the ccma and to close us out while allowing atv/utv/suv traffic that creates considerably more of the poisonous dust you are using to do so is discrimanatory, and reinforces the opinion that the closure is not really asbestos related. human life in every way is detrimental to the ideals of a 'natural' state. by letting bikes ride at ccma and thereby concentrating our 'damage' to an area already damaged, and not well suited for any other purpose not already enjoyed at ccma, the greater good is served by preventing that 'damage' elsewhere.

please consider changing the outlook of the blm closer to the other end of the options scale.

thank you!  
tom keith  
(knobbylips)



slobull@comcast.net  
03/01/2010 12:42 PM

To cahormp@ca.blm.gov

cc " Director,Robert Edward Bullock" <slobull@comcast.net>  
bcc

Subject Bureau of Land Management      Attn: CCMA RMP/EIS  
20 Hamilton Court      Hollister, CA 95023

First off, Please withhold my personal information from being published as per FOA. Secondly, I do not feel that the EPA and others that put in these closure ideas are not representing the People. This is because these agencies are our employees, and serve at our, the People's choice.

I personally do not want this or any area closed to the public and I have many friends and organizations who feel the same. I'm sure the Sierra Club and other such like ECO groups have threatened with law suites and such. That's just their way to push your agency to pressure other over bureaucratic agencies to issue illegal closures and disregard the Peoples choice. If the closures are not established by legislative process, they have not been established by the People.

Enough said, again, closing Clear Creek to the Public is unjust and not a want of the People as a whole, there are dangers all around us every day, getting dirty is by far a lessor danger. Thank you, Bob Bullock



snyderbt@comcast.net  
02/26/2010 06:23 PM

To "Rick Cooper" <cahormp@ca.blm.gov>  
cc snyderbt@comcast.net  
bcc

Subject Comments on Clear Creek DEIS

Date: 2/26/2010 Hollister BLM Mr. Rick Cooper Bureau of Land Management, Hollister Field Office 20 Hamilton Court Hollister CA, 95023 Dear Mr. Rick Cooper, I am an avid recreational motorcyclist, a Board Member of the Oakland Motorcycle Club, and chairman of its dualsport committee. I have ridden multiple times at Clear Creek. The Clear Creek Management Area closure is ill considered. I believe the health claims to be exaggerated and undocumented. The effect on motorcycle recreation is devastating. Please reconsider this action. Sincerely, Brent Snyder 3501 Bridle Drive Hayward CA 94541



someone  
<someone@nothingbinary.com>

12/11/2009 08:26 AM

To cahormp@ca.blm.gov

cc

bcc

Subject Clear Creek Management Area (CCMA)

---

Re: Clear Creek Management Area (CCMA)

Please find a way to continue to allow reasonable access to ATVs to this area. Thanks for your help with this.

Sincerely,

J. McDaniel  
North Hollywood, CA



Steve Craig <Steve@tlc.org>  
03/10/2010 09:14 AM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA

BLM,  
2010

March 10,

My letter is in response to the recent closure order of the Clear Creek Management Area (CCMA). I realize that no decision to close lands which affects large amounts of land and people is easy yet I do not feel the decision was made with long term implications in mind. I will site three reasons why I believe the decision was not in the public's best interest.

1. With current noise regulations of 96dbA being a continuing issue the closure of CCMA forces more motorcycles to ride near homes and cities which operate current OHV park. Even if all the motorcycles are under the noise regulations that larger number of motorcycles will create a greater overall noise pollution. This will continue to fuel the feud between neighbors and park users. Where as CCMA has very few neighbors directly affected by noise and is a good area to allow motorcycle use.
2. With the continued closure of public lands, the most recent being CCMA, my wife and two young sons are forced to ride in small crowded OHV parks. Even with wonderfully maintain parks like Hollister Hills the weekend crowds have resulted in many close calls between my family members and other riders. "During 2003, among persons aged  $\leq 19$  years, at least 245 died and an estimated 56,870 were treated in U.S. hospital emergency departments for injuries sustained while riding a motorcycle." (*JAMA*. 2006;296:273-274.) With injuries always on the ride BLM should be looking for ways to spread out motorcycle rides not pack them tighter together.
3. There will be long term revenue loss to cities near closed public lands. As fewer people ride and purchase motorcycles local shops will close and those cities will lose tax revenue. Local governments will receive less money for motorcycle registration. Thus, many of whom do not ride motorcycles, will be forced to make up the loss with higher registration costs.

I am a pastor at Twin Lakes Church in Aptos, California and part of my job is organizing family rides and CCMA is one of our favorite destinations. I am personally disappointed in the Bureau of Land Management's (BLM) decision to close CCMA under pressure from the EPA and their special interest groups.

As a government organization the BLM is funded by tax dollars and is responsible for managing public lands not closing them. If I ran my church with the same mind set as

BLM has done with CCMA I would take people's offering and then shut down the programs and services that I run.

I realize the closure of CCMA has brought many letter of concern to your offices and I ask that you carefully consider the future opening of CCMA.

Sincerely,  
Steve "Curlee" Craig  
Pastor to High School Students  
Twin Lakes Church  
[Steve@tlc.org](mailto:Steve@tlc.org)  
831-465-3304



blm.docx



Steve Craig <Steve@tlc.org>  
01/19/2010 11:20 AM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>  
cc  
bcc  
Subject ccma

BLM,  
2010

January 19,

My letter is in response to the recent closure order of the Clear Creek Management Area (CCMA). I realize that no decision to close lands which affects large amounts of land and people is easy yet I do not feel the decision was made with long term implications in mind. I will site three reasons why I believe the decision was not in the public's best interest.

1. With current noise regulations of 96dbA being a continuing issue the closure of CCMA forces more motorcycles to ride near homes and cities which operate current OHV park. Even if all the motorcycles are under the noise regulations that larger number of motorcycles will create a greater overall noise pollution. This will continue to fuel the feud between neighbors and park users. Where as CCMA has very few neighbors directly affected by noise and is a good area to allow motorcycle use.
2. With the continued closure of public lands, the most recent being CCMA, my wife and two young sons are forced to ride in small crowded OHV parks. Even with wonderfully maintain parks like Hollister Hills the weekend crowds have resulted in many close calls between my family members and other riders. "During 2003, among persons aged  $\leq 19$  years, at least 245 died and an estimated 56,870 were treated in U.S. hospital emergency departments for injuries sustained while riding a motorcycle." (*JAMA*. 2006;296:273-274.) With injuries always on the ride BLM should be looking for ways to spread out motorcycle rides not pack them tighter together.
3. There will be long term revenue loss to cities near closed public lands. As fewer people ride and purchase motorcycles local shops will close and those cities will lose tax revenue. Local governments will receive less money for motorcycle registration. Thus, many of whom do not ride motorcycles, will be forced to make up the loss with higher registration costs.

I am a pastor at Twin Lakes Church in Aptos, California and part of my job is organizing family rides and CCMA is one of our favorite destinations. I am personally disappointed in the Bureau of Land Management's (BLM) decision to close CCMA under pressure from the EPA and their special interest groups.

As a government organization the BLM is funded by tax dollars and is responsible for managing public lands not closing them. If I ran my church with the same mind set as

BLM has done with CCMA I would take people's offering and then shut down the programs and services that I run.

I realize the closure of CCMA has brought many letter of concern to your offices and I ask that you carefully consider the future opening of CCMA.

Sincerely,

Steve "Curlee" Craig  
Pastor to High School Students  
Twin Lakes Church  
[Steve@tlc.org](mailto:Steve@tlc.org)  
831-465-3304



clear creek.JPG



clear creek.JPG



Steve Greenwood  
<[sgreenwood@powdercoatser  
vices.com](mailto:sgreenwood@powdercoatser<br/>vices.com)>

03/04/2010 01:13 PM

To rick\_cooper@ca.blm.gov

cc Chris Carbonel <[chriscarbonel@cox.net](mailto:chriscarbonel@cox.net)>, Rusty Burkett  
<[rusty@rotolitho.com](mailto:rusty@rotolitho.com)>, Don Manley <[dnmanley@aol.com](mailto:dnmanley@aol.com)>,  
Mike Doushgounian <[mandkdian@aol.com](mailto:mandkdian@aol.com)>, Jeff Johnston  
<[jeff@rotolitho.com](mailto:jeff@rotolitho.com)>

bcc

Subject CCMA RMP/EIS Clear Creek / Tucker Mountain

Good Afternoon Mr. Cooper,

You should have received several hundred signed petitions I sent via certified mail to the Planning Coordinator and to your attention opposing the possible sale of any of the BLM land in the Tucker Zone. On behalf of all my partners of the OPT Ranch I would like it entered into the record that if any of the BLM lands that touch our property go up for sale we get the opportunity to bid on purchase some of this property.

I am hopeful however that the idea we proposed about the limited Elk hunt in this area is something the BLM will take into consideration in deciding what to do with his land. I think this is a win win situation for all concerned.

Thank you for all your cooperation on this matter.

Best regards,

Stephen Greenwood  
General Manager  
Powdercoat Services Inc.  
1747 West Lincoln Ave Bldg. K  
Anaheim, California 92801  
(714) 533-2251 Phone  
(714) 533-1056 Fax  
[sgreenwood@powdercoatser  
vices.com](mailto:sgreenwood@powdercoatser<br/>vices.com)





"Steve Schroeder "  
<Schroeder3@sbcglobal.net>  
03/03/2010 08:30 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject CCMA

Please consider the following comments in your review of the Clear Creek Management Area:

Let me begin with some background. I first rode this area in the early 1970's on my motorcycle. I continued to ride there, with friends and my son Chris, till its 2008 "temporary" closure. Even from the beginning I was aware of the asbestos and rode accordingly--and only during the rainy season. My first knowledge of the closure was through information from others who suddenly found it closed when they drove there to ride. Last year I found contact information on a posted sign at the Clear Creek entrance. I checked local motorcycle shops and found nothing. This January I attended a public comment meeting at Harris Ranch and talked with EPA and BLM reps. This is what I observed:

1. There does not appear to have been any organized effort by the BLM to notify user groups, in general, via clubs or commercial business', such as motorcycle and 4 wheel drive shops. This information was only recently disseminated to them by private individuals.
2. The public meetings were scheduled without adequate notice for preparation and to allow time to attend. I believe my written notice came about one week prior to the three meetings, which were scheduled almost back to back in mid January. No meetings were held south of Clear Creek where my experience indicates a number of users live.
3. In generating the 691 page DEIS, data of air-born asbestos fibers was collected in Nov. 04, Feb 05, and Sep 05. These timeframes were selected to represent both dry and wet conditions. According to an EPA rep. the data was only collected over a one or two day period during the above months. In addition, the Feb. 05 data was collected during the Quicksilver National Enduro. that data would have been generated by 500 motorcycles leaving 4 per minute, plus ghost riders premarking the course, sweep riders clearing it, Individual 5-7 person check crews, in 4X4's and quads, operating a dozen or more checks to score competitors, Search and Rescue coming and going and numerous "outlaw" riders traversing the course. In addition, the course would have repeated many of the same trails 2 or 3 times to achieve the necessary loop mileage for the competitive event. This data hardly represents the "average" asbestos exposure during an "average" wet weather weekend. None of the data collected should be used as a baseline due to the limited timeframe of the samples and the Feb. 05 data being biased.
4. Due to lack of notification will the economic impact be adequately considered not only in the immediate area but in outlying areas where users reside?
5. Review of the seven alternatives raises questions. Alternatives such as the BLM Preferred Alternative would essentially remove all recreational access to the entire 75,000 acres. Although it indicates "proposed" new access routes outside the Serpentine area, these would only allow access for rock hounds, hunters and hikers. According to a Hollister BLM rep. there is no timeline for implementation nor is there any funding source identified. Neither CORVA or the Green Sticker Fund will support or fund "access" roads. Remember the American Indian and promises the Government made? None of the Alternatives offer mile for mile alternate trails created prior to closure of existing trails in the Serpentine area.

Therefore, I would suggest the public comment period be extended with a more zealous public notification process, the asbestos data be acquired over a broader sampling period by an outside contractor, economic impacts be more thoroughly addressed, and Alternatives include support for use of existing areas while alternate trails are created.

I am old enough to say I once rode and enjoyed a number of areas that are now partially or completely closed to ORV use, such as Calif. Hot Springs, Kennedy Meadows, and Pozo, among others. I would hope that this trend of locking us out of public lands that we pay taxes to support will stop here and that responsible multiple recreational uses will prevail. If it does not, the off-roading experience will exist only

in memory and the Bureau of Land Management will become the Bureau of Land Closures.



Sugarpine@aol.com  
03/05/2010 07:25 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP and EIS

## CCMA RMP/EIS Comments

Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

RE: the BLM Resource Management Plan for the Clear Creek Area.

Hello;

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that uses science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the only alternative that we prefer along with these following recommendations:

I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Crystotile asbestos.\*

A. Let the study "precisely delineate" all dangerous asbestos areas.

B. Let roads through all dangerous areas be sealed.

C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.

1. Were they disabled because of asbestosis?

2. Were they hospitalized with asbestosis?

3. Are they now suffering ill effects of their work environment?

a. Explain their ill effect, if any.

II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.

III. Let rockhounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.

\*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.

IV. Waiver-of-Liability forms may be acceptable for rockhounds.

V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

A. Let rockhounds be permitted 24/7.

B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.

VI. Let the public lands with grazing rights leased to local ranchers be completely open for rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

VIII. Archeological or sites of historical significance should be viewable but protected from vandals.

A. This will include hieroglyphics, engravings, paintings, or other artifacts.

B. High fences, posting signs, and signs explaining the artifacts significance may be required.

IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA.

X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely,

Ralph Higbee

32 Maple Lane

Cohasset, CA 95973

no association with any rock/mineral club

sugarpine@aol.com



Ted Peverini  
<tpeverini@yahoo.com>  
03/03/2010 12:17 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject CLEAR CREEK RECREATION AREA

Dear BLM

Clear Creek Area is like a real life book of Nature with pages and pages of information on geology, rock formation, mineralogy, plants and animals. It gives one a real appreciation on the beauty of nature. Spending time there enriches the soul. It's value is incalculable. The area should be left open for all to enjoy!!!!!!!

Thank you,  
Gina Peverini



Ted Peverini  
<tpeverini@yahoo.com>  
03/03/2010 11:53 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CLEAR CREEK RECREATION AREA

Dear BLM

I was very sad when my Grandpa told me we couldn't go rock collecting at Clear Creek any more. I hope he is wrong!!!!!!! I have FUN going with him. He has taught me alot about the different rocks. I like the green ones the best. Don't close my favorite spot in the whole world.

thank you,  
Lawrence Peverini



tfking106@aol.com  
12/23/2009 12:11 PM

To cahormp@ca.blm.gov  
cc mwdonaldson@parks.ca.gov, rnelson@achp.gov  
bcc  
Subject Comment on DRMP/EIS, Clear Creek Management Area (CCMA)

Per BLM's invitation for public comment ([http://www.blm.gov/ca/st/en/fo/hollister/clear\\_creek\\_management\\_area/CCMA\\_RMP.html](http://www.blm.gov/ca/st/en/fo/hollister/clear_creek_management_area/CCMA_RMP.html)), I'm writing to offer some observations on the draft Resource Management Plan/Environmental Impact Statement (DRMP/EIS) on the Clear Creek Management Area (CCMA). My comments are limited to the "cultural resources" aspects of the DRMP/EIS, concerning the cultural/historical significance of the area and the impacts of management on cultural values.

The DRMP/EIS is schizophrenic on the subject of cultural resources. In its generalities, it embraces a broad definition of the term that quite properly cites as examples historic properties of various kinds and culturally significant natural features of the environment. When it discusses how such "resources" will be managed, however, it appears to address only archaeological sites, with an occasional half-hearted bow toward Indian tribal traditional cultural properties. It is clear from the descriptive parts of the document that at least three and possibly four communities ascribe traditional cultural significance to the CCMA, more or less in its entirety -- (1) members of federally recognized and non-recognized Indian tribes; (2) rockhounds, (3) off-highway vehicle (OHV) users, and (4) possibly hunters. It appears likely that the significance ascribed to the area by each of these groups, grounded in association with their traditions and history, is sufficient to make all or much of the CCMA eligible for inclusion in the National Register of Historic Places, but once the evidence for it has been summarized, this likelihood is never further addressed in the DRMP/EIS. When the DRMP/EIS gets around to discussing management strategies, "cultural resources" and indeed by implication even the narrower category "historic properties" have seemingly come to mean archaeological sites alone, and the activities of the OHV community are treated only as impacts on this narrow range of resources.

Clearly, there is a need for further analysis of the eligibility of the CCMA for the National Register based on its traditional cultural value to tribes, rockhounds, the OHV community, and hunters, performed in proper consultation with these groups. I find no evidence in the DRMP/EIS that BLM has undertaken efforts to comply with the requirements for such consultation imposed by Section 110 of the National Historic Preservation Act (NHPA) or by the regulations implementing Section 106 of the same statute, except via its "protocol agreement" with the California State Historic Preservation Officer. If this agreement (which itself is virtually inaccessible to the public) allows BLM to "comply" with Section 106 without consulting such affected groups as the tribes, rockhounds, OHV people, and hunters, it is a questionable agreement indeed. If the statement in your online announcement is any indication ("Although oral comments will be noted on flip charts, BLM will only respond to written public comments in the Proposed RMP and Final EIS"), BLM is challenged by the very notion of consultation. It is difficult to fathom how BLM can seriously think that noting people's comments on flip charts and then ignoring them satisfies the statutory and regulatory requirements for consultation with concerned parties.

I strongly suggest that you scrap your bilateral "protocol agreement" if it permits such abuses of the public trust. I recommend that you initiate proper consultation in accordance with the NHPA Section 106 regulations with all concerned parties, including tribes, rockhounds, OHV operators, and hunters, both about the eligibility of the CCMA for the National Register of Historic Places and about the effects of different management alternatives on the CCMA's cultural significance.

Thank you for the opportunity to comment; please note that my comments are NOT on flip-chart pages.

Thomas F. King

Thomas F. King, PhD

PO Box 14515, Silver Spring MD 20911  
240-475-0595

TFKing106@aol.com

**Blog:** <http://cmplus.blogspot.com/>

**Recently published by Dog Ear Publishing:** *Thirteen Bones*. See [www.tomfking.com](http://www.tomfking.com).

**Recently published by Left Coast Press:** *Unprotected Heritage: Whitewashing Destruction of Our Natural and Cultural Environment*. February 2009

**Also recently published:** *Cultural Resource Laws and Practice (3rd Edition)* Altamira Press 2008. *Saving Places That Matter: a Citizens' Guide to the National Historic Preservation Act*. Left Coast Press 2007;

**Cultural resource management classes** See <http://www.swca.com/isps/training/training.htm>



"The Hummels"  
<thehumfels@att.net>  
01/13/2010 07:29 AM

To <cahormp@ca.blm.gov>  
cc  
bcc

Subject Clear Creek Public Hearings

I won't be able to attend any of the hearings due to work commitments, however pls include this email in support of Clear Creek being open for OHV use. Our family (wife, young daughter, young son, father) have chose to direct some of our resources (including money in local businesses—about \$3,000 per year) in this sport for the quality of family time it provides. No TV's, no PDA's, no texting, etc....we are with each other w/o distractions, and, in nature and we appreciate that. As parents, we also use these times as an opportunity to teach our kids to appreciate nature and preserve mother earth.

Best Regards

The Hummel Family from San Ramon, Ca.  
Kristen, Karen, Sam & Mark



themistersnoid@aol.com  
01/08/2010 01:21 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Reopening Clear Creek

Please reopen Clear Creek to OHV use, rode may Enduros that the Salinas Ramblers & the Timekeepers Motorcycle Clubs put on, motorcyclists are great stewards of the land, thank you for considering my views, sincerely, Robert Jump Dist 36 # 107F



Tristan Mcvay  
<tristanmcvay@gmail.com>  
02/26/2010 06:19 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject Please consider keeping Clear Creek OHV open.

The rate at which OHV parks and other legal OHV areas are being closed or otherwise made unavailable to the paying public is sickening. I would greatly value the opportunity to be able to ride a motorcycle somewhere other than private property in the future. Even if it means imposing and/or increasing fees for use, keep clear creek open.



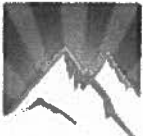
"Troy Collins"  
<tcollins@mkfinancial.com>  
03/03/2010 04:31 PM

To <cahormp@ca.blm.gov>  
cc  
bcc  
Subject Comments

Please confirm that you have received this email and working attachment.

Thank you.

Troy Collins



**Troy V. Collins, RFC.**

**McKINLEY  
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G R O U P**

**President, McKinley Financial Group**

Phone: (650) 551-8900

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image001.jpg DEIS Written Comments [2].docx DEIS \Written Comments.pdf



VANCOURT/HEISER  
<[vancourt7027@sbcglobal.net](mailto:vancourt7027@sbcglobal.net)  
>

01/08/2010 03:02 PM

To [cahormp@ca.blm.gov](mailto:cahormp@ca.blm.gov)  
cc  
bcc  
Subject CCMA RMP/EIS

Dear Sir/Madam:

I support Alternative B. Alternative B will need future fine tuning, but, it satisfies more of the public's needs. I would like to see the inclusion of public wash rack. Do not restrict ages as mentioned in Alternative C. OHV use is a family activity!

Thank you,

Jeri Heiser  
981 California St  
Chico CA 95928  
[vancourt7027@sbcglobal.net](mailto:vancourt7027@sbcglobal.net)



Wayne Michelsen  
<wmichelsen@comcast.net>  
03/08/2010 10:19 AM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA: Use by hang-gliding

To: Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023

Dear Sirs,

I wanted to register my request for consideration of access to the Clear Creek Management Area for the recreation of hang-gliding and paragliding on behalf of myself, and several clubs in the San Francisco, San Jose, and Monterey areas.

Until the recent closure, we had been flying from Goat Mountain and San Carlos Peak to landing areas outside the CCMA. Although our launch points also lie outside the CCMA boundary, our access had been via R011, R001, and T104 along the interior edge of the CCMA. Our use is very low impact on the CCMA as we only need occasional vehicle access to the Goat Mountain and San Carlos Peak areas to drop off our gear, then leave the CCMA.

We had been discussing our activities with George Hill (Assoc. Field Mgr), David Slibsager (Operations Supervisor), and Leslie Hall (Assistant) from the Hollister Office.

I only recently became aware of the public comment period on the CCMA Resource Management Plan and associated meetings. I understand I have missed those deadlines. But, I write to you anyway, and hope you will consider our request.

Sincerely,  
Wayne Michelsen  
Past President, Wings of Rogallo HG/PG Club  
650-207-7766



Wesley Paik  
<wesley.paik@gmail.com>  
03/02/2010 04:00 PM

To cahormp@ca.blm.gov  
cc  
bcc

Subject BLM Draft RMP/EIS Comments

CCMA DRMP/DEIS Comments  
Attention: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office  
20 Hamilton Court  
Hollister, CA 95023

Subject: Erroneous Conclusion

Referring to the Following Paragraph

EPA released the CCMA Asbestos Exposure and Human Health Risk Assessment on May 1, 2008. The result of the study concluded that visiting CCMA more than once per year can put adults and children above EPA's acceptable risk range for exposure to carcinogens and found an increased long-term cancer risk from engaging in many of the typical recreational activities at the CCMA.

Discussion

From the EPA report (May 2008)

Evaluation of chemical risk involves the determination of the extent of exposure to the chemical of concern and the toxicity or dose-response of the organism to the chemical. All risk assessments have some level of uncertainty associated with them. EPA strives to conduct risk assessments that are neither underestimated nor grossly overestimated. However, because our mission is to protect public health and the environment, EPA tries to insure that the public is protected by not underestimating risk. In our risk characterization, we work to identify areas of uncertainty and, if possible, determine their potential impact on our risk estimates. Risk managers use the risk assessment and an understanding of the associated areas of uncertainty to make informed decisions to manage the risk. This section will attempt to present the major uncertainties inherent in the assessment of exposure to asbestos at CCMA and the resulting estimate of risk.

Recommendation

The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".

Wesley Paik  
1625 Almond Blossom Lane  
San Jose, CA 95124



what139350@aol.com  
02/20/2010 07:47 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

To Whom it may concern,

As a user of public lands for recreation, I am strongly opposed to the closure of Clear Creek. In the past I have used this area for OHV recreation and would like to use this area for hunting and OHV use in the future. With the growing population of this state so also grows the need for more available public access to properties such as Clear Creek. The more area available the safer we can keep these activities and the more we can reduce the impact on any one area. Please consider plea to reopen Clear Creek for recreation.

Thank You for Your time.  
Michael J. Pereira  
What139350@aol.com



"White, Mary"  
<mary.white@nursing.ucsf.ed  
u>

02/28/2010 07:04 PM

To "cahormp@ca.blm.gov" <cahormp@ca.blm.gov>

cc

bcc

Subject CCMA response to BLM

Dear Sirs,  
attached is our letter of response to the BLM proposed alternatives for the Clear Creek Management Area. The letter is also pasted below in the event that you are unable to open the document.

Mary C. White, RN, MPH, PhD  
Professor, Community Health Systems  
University of California, San Francisco  
School of Nursing  
2 Koret Way, Box 0608, N511R  
San Francisco, CA 94143-0608

February 28, 2010

Bureau of Land Management  
Attn: CCMA RMP/EIS  
20 Hamilton Court  
Hollister, CA 95023  
E-mail: cahormp@ca.blm.gov

We are writing to make comments on the future disposition of the Clear Creek Management Area. Our comments are both professional, as my wife is a PhD trained epidemiologist, and personal, as I am a horticulturist and both of us are members of the California Native Plant Society, birdwatchers and rockhounds. We attended the meeting on the Clear Creek closure to hear what chances we would have to enter this area and understand that a number of possible outcomes are being considered.

From a risk and hazard standpoint, we want to point out two recent articles in the environmental and occupational peer-reviewed literature that point to the difficulty in measuring environmental asbestos risk accurately and the adverse health outcomes of denying people the ability to enjoy the outdoors.

1. Silverstein MA, Welch LS, Lemen R. Developments in asbestos cancer risk assessment. Am J Ind Med. 2009 Nov;52(11):850-8.  
These researchers are from the Department of Environmental and Occupational Health Sciences, University of Washington School of Public Health, Seattle, Washington. They describe efforts that have been made for the past 25 years to determine valid information on asbestos risk at both the worksite and the community. In a comprehensive review of risk assessments by the EPA, OSHA and NIOSH, these researchers determined that none of the efforts to use statistical models to predict cancer risks from asbestos of different fiber types and sizes were able to overcome limitations of the exposure data. They conclude "Resulting uncertainties have been so great that these estimates should not be used to drive occupational and environmental health policy."

We agree, and understand that while occupational health providers and researchers have examined asbestos risks and outcomes for a number of years, these investigations have been based on exposure to specific asbestos fibers within defined closed settings of the occupational site, and not related to recreation in an open area.

2. Harper M. J 10th Anniversary Critical Review: Naturally occurring asbestos. Environ Monit. 2008 Dec;10(12):1394-408.

Dr. Harper is from the Exposure Assessment Branch, Health Effects Laboratory Division, of the National Institute for Occupational Safety and Health. He describes the ubiquitous nature of naturally occurring asbestos in a number of areas of the world. While he acknowledges the risk of diseases from high exposures among miners and asbestos products workers, he clearly states that the risk to health of living or being in an area where there are natural occurrences of asbestos minerals is not well proven, and points out that the accepted definitions of asbestos, including dose and mechanisms of measurement, are not clear or well accepted. He concludes "The discovery of asbestos or related minerals has consequences beyond any immediate risks to health, including profound effects on the value of and ability to use or enjoy property."

As an epidemiologist, my wife fully understands the scientific mistakes that are made when anecdotal evidence is provided to justify a position (for example, someone who smoked for many years and never got cancer). However, anecdotal evidence can be the start of scientific inquiry; and to date, there has been no anecdotal - much less scientific - evidence of people getting the diseases associated with asbestos from the Clear Creek area or from other naturally occurring outside sites. While difficult to study diseases with long incubation periods, it is possible to do so, and there simply is no evidence in the medical literature to support an excess risk from asbestos in naturally occurring regions. And the fact that California has so much naturally occurring asbestos, one would think that our morbidity and mortality from asbestos-related causes would be higher in the general public, and long ago brought to the attention of public health officials.

The statement of Dr. Harper about the effects of people not being able to use or enjoy property embodies the sentiments of many of us who want to enjoy recreation at Clear Creek. There could and should be studies of quality of life issues related to reduced ability to use national lands. For us and for many others, the benefits of being in this unique and special region clearly outweigh the risks - whatever they may be and however they may be measured.

We are sure the BLM understands what a special and unusual place Clear Creek really is. If a risk related to recreational exposure to naturally occurring asbestos actually exists, the risk to us personally is extremely low: we are both in our sixties and our exposure while driving in an enclosed auto lowers this yet further. Our interest is in being able to hike and enjoy the area, and having to walk in from the entrance would be difficult if not impossible. While we wish the BLM would reopen Clear Creek entirely, we profoundly hope that we will retain access to the area. Specifically we would think that a minimal access for recreation would include keeping open a circle loop of roads: from Clear Creek Road into the area, meeting the Idria Road that climbs the ridge (allowing access all the way to Spanish Lake) then to T175 that gives access to the California State Gem Mine, meeting the paved road that ends at Sawmill Creek, then completing the loop (through Four Corners and T151) back to the Clear Creek Road. This loop goes through all the geologic, plant and wildlife regions in this magnificent area, allowing enjoyment for rockhounds, native plant folks and bird watchers.

We appreciate the opportunity to respond to the proposed changes to the Clear Creek Management area.

Sincerely,  
Harry and Mary White  
155 Marston Ave.  
San Francisco, CA 94112

415-334-1512



CCMA BLM response White2-28-2010.doc



Winnsun@aol.com  
03/09/2010 05:04 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject ccma

Clear Creek has been closed using false and misleading science as a reason to keep the public from using it. I have personally used the are for the past 30 years and have NEVER heard of any health related problems from asbestos exposure in the area .Simply put,the EPA has effectively taken away a valuable recreational area using junk science and improper data from their research. The danger from using Clear Creek is simply overstated and malicious. This has to stop and the BLM must reopen the area to the public.If the dangers are so real and present, why are there NO deaths or health related problems surfacing today? I feel the BLM closed the area to avoid lawsuits that might appears in the future and can't afford to defend themselves from frivolous claims,or is it that the best way to "manage" and area is to close it to all public use and hide from the truth, there is NO asbestos health risk nor has there been for that last 100 years. Just check out the mining records for a real perspective of the risks over the last 100 years.

Please return Clear Creek to the public without delay. Brian Winn



winnsun@aol.com  
01/21/2010 10:02 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject Clear Creek

I believe there is not enough evidence to prohibit motorcycles from using Clear Creek. I have enjoyed riding there since 1976 and have never heard of any asbestos related deaths or injuries from exposure. The "emergency closure" is a gross exaggeration of the risk to human health. The land should be open to the public with maps provided and supervision supplied by BLM. I urge you to open the area and support responsible recreation by all visitors.

Brian Winn  
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Wschrimp@aol.com  
02/26/2010 01:43 PM

To cahormp@ca.blm.gov  
cc  
bcc  
Subject CCMA RMP/EIS Comments

CCMA RMP/EIS Comments  
Attn: Planning Coordinator  
Bureau of Land Management  
Hollister Field Office

Concerning the BLM Resource Management Plan for the Clear Creek Area.

Dear Sir,

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that uses science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the **only** alternative that we prefer along with these following recommendations:

I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Crystotile asbestos.\*

A. Let the study "precisely delineate" all dangerous asbestos areas.

B. Let roads through all dangerous areas be sealed.

C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area.

1. Were they disabled because of asbestosis?

2. Were they hospitalized with asbestosis?

3. Are they now suffering ill effects of their work environment?

a. Explain their ill effect, if any.

II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.

III. Let rockhounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rockhounding in the Clear Creek area.

\*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.

IV. Waver-of-Liability forms may be acceptable for rockhounds.

V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

A. Let rockhounds be permitted 24/7.

B. Access restricted, by appointment only, to certain times or dates is not conducive to good public relations and is not acceptable.

VI. Let the public lands with grazing rights leased to local ranchers be completely open for rockhound use with points of access at nearest public road.

A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.

B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.

C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

VII. Let areas with endangered species be fenced off.

VIII. Archeological or sites of historical significance should be viewable but protected from vandals.

A. This will include hieroglyphics, engravings, paintings, or other artifacts.

B. High fences, posting signs, and signs explaining the artifacts significance may be required.

IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA.

X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Sincerely,

Wayne Schrimp  
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714-305-0135