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U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
HOLLISTER FIELD OFFICE

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

March 3, 2010

**It's a real world**

Gentlemen:

One important thing that has not been taken into consideration is that the Agency has not found a reasonable balance between what is the theoretical information and the information that is available on the subject of asbestos toxicity at CCMA. The EPA study presents model of risk on one hand, and the available literature presents a very different model of risk that is based on actual studies. Further, the Agency appears to have put forth no effort whatsoever to locate or include, let alone the analyze the known data.

When the known affects of the various alternatives presented and their devastating impact on OHV recreation and access in general at the CCMA is viewed in the light of the available information on chrysotile asbestos toxicity, the preferred alternative appears irrational.

The agency proposes to replace an existing management plan with a new management plan that acknowledges an "increase in demand for use of public land for recreation and energy production", yet documents a reducing trend for visitor use and a low potential for energy production. Yet it produces a set of alternatives that reduces public land available for recreation, and in Table 2.4-1(a), Summary of Range of Alternatives never mentions energy production. Every alternative decreases recreation use rather than increasing it to accommodate demand. The low potential for energy production remains low regardless of the management option.

Further, the Agency proposes to replace an existing management plan with a new management plan that acknowledges an "increased awareness and social value placed on

cultural and natural resources”, and documents the social value placed on CCMA’s 50 year history of OHV as a cultural resource, yet produces a set of management plans that to ever increasing degrees, reduces the OHV opportunities from 242 miles available to motorcycles, ATV and 4WD to eleven miles for SUV only.

There is no rationale for such a proposal. The proposed action does not flow logically from the purpose and need presented in the document when compared against a known data on asbestos toxicity from around the world is irrational.

I submit the following list of sources on known effects of chrysotile exposure; a copy of each has been provided.

Table 1.

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- Bernstein, David. *Comparison of Calidria Chrysotile Asbestos to Pure Tremolite: Final Results of the Inhalation Biopersistence and Histopathology Examination Following Short-Term Exposure*. 2005.
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- Flanagan, Sheila. *The Value of Chrysotile Defense*. 2004.
- Camus, Michel, PHD. *Nonoccupational Exposure To Chrysotile Asbestos and the risk of Lung Cancer*. 1998.
- Coleman, R.G. and Johnson, Neil F. Dr. *New insights on environmental asbestos developed*. 1995.
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- Gibbs, Graham W. and Berry, Geoffrey. *Mesothelioma and asbestos*. 2007.
- Ilgren, E.B. *Health Risks from Exposures to Asbestos, Metals, and Various Chemicals due to Collapse of the World Trade Center: An Environmental Residential Survey with a Commentary Related to Ground Zero Workers*. 2001.
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- Ilgren, E.B. *Coalinga Chrysotile: A Short Fibre, Amphibole Free, Chrysotile: Part V – Lack of Amphibole Asbestos Contamination*. 2004.
- Ilgren, E.B. *Coalinga Chrysotile – The Case of the Missing “Asbestos Study”: Corporate Connivance or Plaintiff Ploy?*. 2004
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McDonald, J.C. and McDonald, A.D. *The epidemiology of mesothelioma in historical context.* 1995.

McDonald, J.C. and McDonald, A.D. *Chrysotile, Tremolite, and Carcinogenicity.* 1997.

Reed, Irvine. *False alarms over asbestos rack up costs.: Unwarranted concern over health risks from asbestos in school buildings and other structures.* 1994.

Nolan, R.P. and Wilson, Rickard, and Langer, A.M. *A risk assessment for exposure to grunerite asbestos(amosite) in an iron ore mine.* 1999.

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Van Orden, D.R. and Allison, K.A. and Lee, R.J. *Differentiating Amphibole asbestos from Non-Asbestos in a Complex Mineral Environment.* 2008.

Pierce, Jennifer S., McKinley, Meg A., Paustenbach, Dennis J., Finley, Brent L. *An Evaluation of Reported No-Effect Chrysotile Asbestos Exposures for Lung Cancer and Mesothelioma.* 2008.

Nolan, Robert P. and Ross, Malcolm. *History of asbestos discovery and use and asbestos-related disease in context with the occurrence of asbestos within ophiolite complexes.* 2003.

Science News. *Most asbestos poses little human risk.* 1990.

Stettler, Lloyd E., Sharpnack, Douglas D. and Krieg, Edward F. *Chronic Inhalation of Short Asbestos: Lung Fiber Burdens and Histopathology for Monkeys Maintained for 11.5 Years after Exposure.* 2007.

Yarborough, Charles M. *Chrysotile as a Cause of Mesothelioma: An Assessment Based on Epidemiology.*

Regards,



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