

831-630-5055

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

DATE: 3 March 2010

RE: Comments on Clear Creek Management Area Draft RMP/EIS

Dear Planning Coordinator

I want to voice my support for the recent vote by the OHMVR Commission to petition the BLM to extend the public comment period for 90 days. In the last 30 years, over \$9 million dollars of OHV Trust Funds have been granted to the BLM to manage the Clear Creek Management Area. The OHV community is being overwhelmed by an avalanche of concurrent federal planning processes. The release of the Revised RMP/DEIS was delayed for a year or more, and it seems unfair for BLM to ignore the requests for an extension when BLM's own actions seemingly reflect the complexity and sensitivity of this subject. The BLM should show respect for the public and land-use partners by granting an extension.

The BLM should honor the February 12, 2010 formal request by the following organizations to extend the public comment period for 90 days. Those groups include; AMA, BRC, AMA D36, TimeKeepers MC, Salinas Ramblers MC, CA4WDC, ORBA, AMA D37, CORVA, and Friends of CCMA. Because the 70,000-acre CCMA is the largest destination OHV area in Central California, the BLM should grant an extension to insure they make an informed decision.

The BLM should grant a 90-day extension because the local and regional business community was largely unaware of DEIS planning process. Many shop owners attended the recent DEIS socioeconomic public meeting in San Jose and those proprietors need the extra time so they can properly articulate and document the fiscal hardships they have experienced by the current interim closure and, more importantly, illustrate the future monetary impacts of a permanent closure of CCMA to OHV recreation.

The DEIS is fatally flawed because it does not analyze the socioeconomic impacts to local and regional businesses including restaurants, motorcycle shops, hotels, sporting goods stores, gas stations, and grocery stores. The omission must be addressed in the FEIS/ROD.

The EPA's 2008 CCMA Asbestos Exposure and Human Health Risk Assessment is a fatally flawed study that should not be considered significant new information. A primary fatal flaw is in the study design. The EPA's sample collection 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. The second and third trailing riders rode in the dust cloud of the lead rider, to the extent safe and practical." That narrative does not match the BLM's ongoing 20 year educational outreach that instructs riders to not ride in another rider's dust cloud. Most, if not all, riders avoid riding in a dust cloud.

The Purpose and Need in the DEIS notes the; "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." Recent public testimony at the February 25, OHMVR Commission meeting illustrated that displaced CCMA OHV riders are overcrowding the regional OHV areas that include, Jawbone OHV Area, Hollister and Carnegie SVRAs, and Metcalf Cycle Park. A Cumulative Effect analysis must be included in this planning process.

The EPA Risk Assessment is fatally flawed because a majority of the samples were collected during dry periods when Clear Creek was closed to the public. That information was gleaned via a FOIA request that showed a personal communication from Daniel Straika, EPA. The FOIA information also showed BLM toxicologists raised

questions about the validity of the EPA study. The EPA study should be redone or at least reviewed by a qualified independent body.

The OHV community cannot rely on the BLM "finding" another OHV area to replace CCMA. The BlueRibbon Coalition submitted formal comments on the Hollister Field Office's 2007 Draft RMP/EIS petitioning the agency to consider OHV opportunity on lands outside of CCMA. However, BRC found the BLM has used a manner of reverse or circular logic to develop Alternative C which effectively banned OHV use on lands outside of CCMA. CCMA must be reopened for OHV use since the BLM has functionally eliminated motorized recreation on its other lands.

The BLM/EPA has used inaccurate visitor use scenarios regarding time spent traveling on routes in the ACEC. They have based the human risk analysis on flawed assumptions such as stating the average speed dirt bikes on single track trails is 15-20 mph. Unless you are a national caliber rider you know speeds on single track trails average no more than 12 mph. The planning process must address this issue.

The DEIS is fatally flawed because it ignored the scientific work in process at the EPA's Office of Solid Waste and Emergency Response to create a new risk analysis methodology for chrysotile since there is a growing body of scientific opinion that chrysotile is not a significant public health risk. This runs counter to EPA's Region 9 hypothesis that a "single fiber of chrysotile asbestos is as dangerous as a billion fibers of chrysotile asbestos." The BLM must analyze all current science before permanently closing CCMA to OHV recreation.

In the DEIS, the BLM makes a false assumption that OHV users would not be willing to use a wash rack at the agency's new Decontamination Center at the entrance of CCMA. Most riders would jump at the chance to wash off the infamous CCMA mud/dust off their vehicles before leaving the area. If needed, a study should be done to analyze user compliance with a wash rack before assuming and incorporating that theory into an alternative.

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. This area has been used for over 100 years for the collecting of rocks and minerals by armature collectors and the specimens have been used in numerous educational facilities through out the state. I have spent many happy hours and days collecting in this area.

Very truly yours,

John Martin
1309 West Ave. L4
Lancaster, CA 93534

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Bureau of Land Management
Hollister Field Office
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Hollister, CA 95023

10 MAR -8 PM 2:45
BUREAU OF LAND MANAGEMENT
HOLLISTER FIELD OFFICE

March 3, 2010

RE: Comments on Clear Creek Management Area Draft RMP/EIS

Dear Planning Coordinator

My name is Shawn Storc, my extended family and I greatly enjoy recreating on all of our public lands. We have been OHV enthusiasts for many years and plan to share our enthusiasm with future generations of our family. Recent events concerning OHV area closures and restrictions have lead me to write to you today. I am writing to express concern about the future of OHV usage at the Clear Creek Management Area (CCMA), the points below outline my thoughts on the current situation with respect to the closure of the CCMA.

I want to voice my support for the recent vote by the OHMVR Commission to petition the BLM to extend the public comment period for 90 days. In the last 30 years, over \$9 million dollars of OHV Trust Funds have been granted to the BLM to manage the Clear Creek Management Area. The release of the Revised RMP/DEIS was delayed for a year or more, and it is unfair for BLM to ignore the requests for an extension when BLM's own actions reflect the complexity and sensitivity of this subject. Is it unreasonable for the BLM to show respect for the public and land-use partners by granting an extension?

The BLM absolutely should honor the February 12, 2010 formal request by the following organizations to extend the public comment period for 90 days. Those groups include; AMA, BRC, AMA D36, TimeKeepers MC, Salinas Ramblers MC, CA4WDC, ORBA, AMA D37, CORVA, and Friends of CCMA. The 70,000-acre CCMA is the largest destination OHV area in Central California, and as such provides a myriad of benefits to people who recreate there, but also to local communities in the form of money spent at local business by those visitors. It is critical that the BLM grant an extension to insure an informed decision.

Supporting my above point regarding economic benefits of the CCMA, the BLM should grant a 90-day extension because the local and regional business community was largely unaware of DEIS planning process. Many shop owners attended the recent DEIS socioeconomic public meeting in San Jose and those proprietors need the extra time so they can properly articulate and document the fiscal hardships they have experienced by the current interim closure and, more importantly, illustrate the future monetary impacts of a permanent closure of CCMA to OHV recreation.

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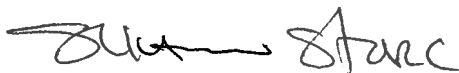
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Very truly yours,



Shawn Storck
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