

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

10 FEB 29 PM 1:09
U.S. DEPT. OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95023

February 26, 2010

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.

Thank you for your consideration.

Yours truly,



Ian Plaine
21 Rio Del Ct.
Danville CA, 94526

10 MAR - 1 PM 5:26
U.S. DEPT. OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95023

CCMA DRMP/DEIS Comments
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Bureau of Land Management
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February 26, 2010

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".

Thank you for your consideration.

Yours truly,

A handwritten signature in black ink that reads "Ian Plaine". The signature is written in a cursive, flowing style.

Ian Plaine
21 Rio Del Ct.
Danville CA, 94526

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February 26, 2010

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 identified as tremolite, actinolite, or another amphibole asbestos mineral. There is an **emerging consensus in the scientific community** that amphibole asbestos may present an 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 a specific analysis of asbestos fibers which would separately account for or differentiate 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.

Thank you for your consideration.

Yours truly,



Ian Plaine
21 Rio Del Ct.
Danville CA, 94526