

Comment # 4

THE LACK OF NEED AND PURPOSE

10 MAR -2 PM 1:03

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95023

The BLM state as the purpose and need for a new RMP for CCMA (1.1) page (3, 4)

- (a) 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.
- (b) The current management plan does not specifically address listing and/or additional habitat needs for species protected under the federal 1973 Endangered Species Act (ESA), including the California condor, red-legged frog, and tiger salamander.
- (c) 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.

There is no need or purpose for a new RMP for CCMA.

- (a) 40 CFR 1501.7(3) The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) is only one of many studies done in and around the area at CCMA .It does not impose any enforcement of change to the 1984 RMP. This is a risk assessment not a statement of fact. The (2006 EA) addressed this risk already. BLM developed a series of CCMA Amendments to the 1984 Hollister Resource Management Plan (RMP) to address public health and safety concerns associated with exposure to asbestos and other emerging issues. These amendments, approved in 1986, 1999, and 2006 included management goals and objectives to reduce and minimize risk to human health and the environment. However, they also continued to allow public access for multiple uses. No changes in the 1984 RMP are needed for a new study about an old concern.
- (b) 40 CFR 1501.7(3) The current management plan does not need to be addressed because as stated in this draft at (3.6.5) (page 174) California red-legged frogs(*Rana draytonii*), while present in the San Benito River Watershed fifteen miles or more downstream, have never been recorded in or near the CCMA. California Tiger salamanders are present in sag pond habitat in the San Andreas Rift Zone to the west and in vernal pool habitat in the Central Valley to the east

but have never been recorded in the environs of CCMA. (3.6.5.6) page 187, The California condor only has the potential to occur within the CCMA. If there is no evidence of need to address the listing and or habitat needs and agency wishes to keep these claims in the analysis, please add the following conclusion at the end of the discussion."However, no evidence has been uncovered to support this claim."

- (c) No changes are needed because the social and economic conditions are outside the scope of this RMP and according to page 279 (The findings from the ICF survey were compared to those presented in the 1990 Study. The results the number of households that drive off-highway for recreation decreased from 13.6% in 1989 to 9.9% in late 2003). The only social value placed in the Planning Area is as stated on page 148 (3.3.4.1) Motorcycle and ATV riding are the most prevalent recreation activities in the CCMA.

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Comment #1

ASSUMPTIONS THAT LACK EVIDENCE

10 MAR -2 PM 1:04

RECEIVED
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
401 C STREET, L.A. 350 23

If the health risks was so great that an emergency closer was enacted ,why after 18 months of making this RMP-EIS draft and 50 + years of mining, milling, and recreational use in the CCMA area there is no epidermal or forensic evidence to confirm the health risk of naturally occurring chrysotile asbestos from the serpentine soil and rocks to produce any type of cancer? The risk assessment has been taken as a statement of fact, when it is only an and an incomplete analysis (1502.22) based on some occupational models adjusted to look like they have some sort of meaningful relationship to recreational usage at CCMA. The truth is risk assessment is a fancy way of saying a wild guess of what the future may be. Many times statistics have been used to circumnavigate the truth or lack of it. Statistically it can be shown that there's a higher probability of dying, when driving to and from CCMA than recreating at CCMA. Motorcycle riding is not only a recreation it's also a sport the same as baseball, football, soccer or gymnastics. If the same risk assessments were placed on any of these sports none of them would be below the 1,000,000 to 1 percentage that the EPA is saying must be met to insure the safety and health to the public .The BLM take into consideration a risk assessment that fits the definition of "No Significance "and uses it to exclude any and all alternatives that may have been considered for CCMA . This decision has failed to find a reasonable balance between theoretical information and the value of motor recreation 1502.22(a),(3,4). Assumptions were made when information critical to the analysis was incomplete or unavailable.

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ASSUMPTIONS THAT LACK EVIDENCE

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RECEIVED
U.S. DEPT. OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95024

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#2 Comments

ALTERNATIVES NOT CONSIDERED

10 MAR -2 PM 1:04

RECEIVED
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95023

Not considering designation of CCMA as an 'Open' area in the range of alternatives unless posted limited or closed use (2.2.3.). as the no action alternative is clearly a violation CEQ 401502.14 (d) and NEPA (6.6.1.1) Using the EPA's risk assessment as reason not to consider this alternative is not relevant.

The agency wrote "Designation of CCMA as an 'open' area for vehicle use is not considered in the range of alternatives, because this type of designation would not meet the purpose and need for this RMP/EIS to minimize human health risks from exposure to asbestos and reducing airborne asbestos emissions from BLM management activities. 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 the amphibole family in causing mesothelioma (U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, Toxicological Profile for Asbestos)".

Comment # 16 multiple use

10 MAR -2 PM 1:04

Page II

The BLM is responsible for the sustainable management of public lands and resources and their various values so that they are considered in a combination that will best serve the needs of the American people. Management is based upon the principles of “multiple use” – a combination of uses that takes into accounts the long-term needs of future generations for renewable and nonrenewable resources. These resources include public health and safety, recreation, range, timber, minerals, watershed, fish and wildlife, wilderness, and natural, scenic, scientific, and cultural values.

The CCMA RMP/EIS provides an updated assessment of resources, uses, conditions, and trends; a forum for enhanced public collaboration and involvement; and a comprehensive impact analysis of reasonable management alternatives and resulting land use decisions.

The BLM is responsible for managing the lands for multiple uses, including recreation and cultural values. They also state that over 70 percent of the recreation within CCMA is within the serpentine area, and the overwhelming majority of public scoping comments identified CCMA’s unique recreation opportunities as the number one issue. Yet the BLM gives only alternatives that go against the will of the people and their mission statement. None of the alternatives expand recreational opportunities, they reduce them. The whole DEIS goes against the BLM’s mission statement, this is what enhanced public collaboration and involvement and reasonable management alternatives responsive to public input mean to the BLM. No fair or balanced decisions when it comes to OHV. 40CFR 1501,7(1) & 40CFR 1502 9(b)

The BLM should put in their principles of “multiple use” this does not include OHV use.

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Comment #1

ASSUMPTIONS THAT LACK EVIDENCE

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U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLDSVILLE, IDAHO

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#2 Comments

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U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTON, CA 95020

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Comment 3 NO ACTION ALTERNATIVE

10 MAR -2 PM 1:04

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CALIFORNIA 95023

The BLM says this Draft RMP/EIS has been developed in accordance with the National Environmental Policy Act of 1969 (NEPA), and the Federal Land Policy and Management Act of 1976. This document contains the no action alternative, six additional action alternatives, and BLM's preferred alternative.

The CEQ regulations direct that RMP/EIS has a No Action alternative (40 CFR 1502.14(d)). The No Action alternative is the only alternative that must be analyzed in an EIS that does not respond to the purpose and need for the action. In the BLM's alternative "A" there version of a "No Action Alternative" has incorporated no less than 5 major changes to the RMP/EIS which clearly shows no respect of the rules and violates NEPA 6.6.2, ruling concerning the no action alternatives. The BLM defines Alternative A as (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.) When in fact they have added changes in trail use, multimillion dollar wash facility, removed rights of miners to enter their mining claims, added seasonal restrictions, even a plan to reseed the staging areas with evening primrose an endangered species. How can they even consider this a no action alternative?

Hiding all these changes to be made under Alternative A and then saying it's a no action alternative goes to show how the draft is deceiving to the public. The only NO ACTION ALTERNATIVE is to delete this entire draft

The BLM has decided to incorporate their own rules to bypass NEPA in which the BLM can incorporate into any alternative any goals they want with no public or government interference

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Comment # 4

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Comment # 5 NO BALANCE OF ANALYST

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BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95023

During the scoping report these studies were brought to the attention of the BLM

(1) Ilgren/BRC April 16 Letter/Questions to EPA this information presents substantive questions to the BLM/EPA regarding the validity of the agencies' continued efforts to present the naturally occurring asbestos in CCMA as a health risk.

(2) Ilgren Article: Coalinga Chrysotile, A Short Fiber, Amphibole Free, And Chrysotile: Part V – Lack of Amphibole Asbestos Contamination

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(4) The California Coalinga Chrysotile Miners and Millers – Further Evidence for a Lack of Attributable Disease including a Refutation of Egilman and Roberts's [2004] Claims

The BLM's omission of these studies in any of its analysts is evidence by their acknowledgement of them in the scoping report but no mention of the studies in the RMP goes to show no balance of analyst. These studies need to be included into the RMP to produce a more balanced analyst of the risks of Chrysotile type asbestos.

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Comment 6
Social and Economic Contribution

The The Hollister Field Office (HFO) incorrectly states because the number of people and size of the economy associated with that population dwarf any of the social and economic contributions that might be made by public land resources. This is only an assumption on the part of HFO. The public outrage from closing CCMA may be proof of the social contribution these public lands have on the public. With lack of a survey or any baseline to make an informed judgment this statement should be removed.

3.15.3 Regional Setting

Throughout most of the western United States where public lands are located, the resident population within the administrative boundaries of a Field Office is small, and the public land area is often the major component of the total land area. However, the 12 counties in which the HFO public lands are located – Alameda, Contra Costa, Fresno, Merced, Monterey, San Benito, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz, and Stanislaus – have a resident population of over eight million, and the HFO administers only 2.5 percent of the total land area, about 274,000 acres. At 63,000 acres, CCMA comprises almost one-quarter (~23%) of the BLM-administered lands in the region. Other communities within commuting distance from CCMA include residents from Tulare, Madera, San Luis Obispo and Kings Counties.

The large population centers near CCMA have implications for public land management because they represent the potential user and customer base that is within a three-hour drive from CCMA, but they do not provide a useful context for discussion of socioeconomic conditions. The number of people and the size of the economy associated with that population dwarf any of the social and economic contributions that might be made by public land resources. To facilitate discussion of socioeconomic conditions, the local analysis area for this RMP/EIS will be defined as the Central Coast and the Southern Diablo Range – each of which focuses on communities most directly affected by the CCMA RMP/EIS alternatives. The Central Coast analysis area focuses on residents of Santa Clara, Monterey, and Santa Cruz counties; and the Southern Diablo Range analysis area includes San Benito, Merced, and Fresno Counties. San Benito and Fresno counties encompass CCMA and a large block of contiguous BLM public lands in the Southern Diablo Range located west of Interstate 5, north of the town of Coalinga and south of the town of Los Banos. *Clear Creek Management Area 3.0 Affected Environment Draft RMP/EIS Social and Economic Conditions 273*

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MAR - 2 PM 1:05

Comment 7 NOA define

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The new information has no conclusions in it which to make a fair and informed decision upon exposures to natural chrysotile deposits. Epidemiological studies are mentioned but are not cited or given as evidence. If this Purpose and need statement is to be left in the draft it needs to be changed to something that has to do with asbestos products brought into CCMA not the serpentine soil that's there.

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U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HILLSBORO, CALIFORNIA 95020

Comment # 4

THE LACK OF NEED AND PURPOSE

10 MAR -2 PM 1:05

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOLLISTER, CA 95028

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U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MOLLER BUILDING 90023

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BUREAU OF LAND MANAGEMENT
HOLLISTER FIELD OFFICE

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10 MAR -2 PM 1:05
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HELDENBURG, CA 95028

Comment 10

Purpose and need recreation

Page 4, Purpose and Need. The third stated purpose and need for this DEIS is stated as:

“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.”

As for recreation, increased demand for use of public land for recreation. Decreasing the area available for recreation doesn't address the “need “Thus, none of the alternatives addresses the need for this increased demand. All of the alternatives actually reduce the land available for recreation, not increasing it. The stated purpose and need for increased demand for public land for recreation are contradicted within the document by every and all alternatives which decrease the amount of land available, not increasing the amount available, which would satisfy the stated need. Given that the historic use of the area is for recreation, none of the alternatives satisfy the stated purpose and need.

Resolution

Remove all alternatives that would decrease the amount of land available for OHV recreation.

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Comment #11 Dirt

page 2, states:

Human disturbance to the soils and plants in the serpentine ACEC is a special management concern, because throughout the ACEC, soil formation tends to be slow and the topsoil shallow. Plant regeneration is also slow, and accelerated erosion from human activities has negatively impacted soil and vegetative resources over the years.

There is no evidence of data supporting the assertion that there is accelerated erosion from human activities within the CCMA. There is also no supporting data indicating there is accelerated erosion of any kind. BLM photographs of the area from the 1930's show the area to look nearly identical to what it currently looks like now, not to bad for 80 years of use.

Delete the following from the paragraph: “, and accelerated erosion from human activities has negatively impacted soil and vegetative resources over the years”

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Comment # 12 Primrose

Page 53 makes several conflicting statements, and an omission error:

SSS-A1. Establish appropriate levels of surface disturbance to protect special status species and their associated habitats.

SSS-A11. Rehabilitate (by ripping and/or pitting) potential habitat areas for the San Benito evening primrose in Clear Creek Canyon.

SSS-A12. Initiate an ecological study of the San Benito evening primrose to determine habitat requirements.

The first statement is correct in that it is known that the San Benito Evening Primrose needs disturbed soils to thrive. There are already many areas of San Benito evening primrose in Clear Creek Canyon to replace the other inhabitants without a proper study is wrong. There is no data supplied to justify the ecological study, nor what problem it proposes to resolve.

Supply the missing data, or delete the SSS-A11 and SSS-A12 statement.

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Comment # 13 Uses

2.4.15.1 Goals and Objectives

The goal for social and economic conditions is to manage public lands to provide social and economic benefits to local residents, businesses, visitors, and future generations.

To achieve this goal, the following objectives are established:

- Work cooperatively with private and community groups and local tribal governments to provide for customary uses consistent with other resource objectives and to sustain or improve local economies.
- Maintain and promote the cultural, economic, ecological, and social health of communities associated with BLM public lands.

The Agency states they will provide for customary uses, but no customary usages are stated. Customary uses have been recreation and mining. When the KCAC mine closed, the last active large mine in the area. OHV usage has become the dominant use from the 1970's (page 205) to the present.

Resolution:

Add that the customary uses since the mid 1800's have been mining, and from the 1960's have also included dirt bike riding. Since the mid-1970's motorized vehicle recreation has been the dominant public use within the area. It should also be noted that the area was previously known as the Clear Creek Recreation Area.

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Comment # 14 Tourism

Page 74 states:

SOCEC-A1. Protect and conserve natural values while allowing for tourism and commodity use of natural resources.

Since the closer of CCMA area the commodity use of the area has increased tenfold with the illegal cultivation of marijuana which is higher in customary usage than tourism has ever been.

Why this section talks about tourism is not understood since tourism is not a major part of its customary usage. Tourism historically is a minor customary use of the area at best. Unless there referring to page 273 which states: Discussions with area residents, public land users, and BLM staff indicate that, in fact, recreationists come from all over California and the U.S. to recreate in CCMA.

Page 205 states: "Since the mid-1970's motorized vehicle recreation has been the dominant public use within the area."

Change the paragraph to read:

SOCEC-A1. Protect and conserve natural values while allowing for continued use for its historic use as a recreational area for dirt bikes, 4-wheeling, rock and mineral collecting, tourism, and commodity use of natural resources.

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Comment # 15 New P & N

2.5 BLM's Preferred Alternative

The CCMA RMP/EIS range of alternatives considers allowable uses, resources protection measures, and management tools that would protect human health and safety, natural and cultural resources, and the CCMA's unique recreation opportunities, which were overwhelmingly identified as a priority in the public scoping process. In accordance with the National Environmental Policy Act (NEPA), alternatives must: meet the purpose and need, as identified in Chapter 1; be viable and reasonable; provide a mix of resource protection, management use, and development; be responsive to issues identified in scoping; and meet the established planning criteria (also identified in Chapter 1), federal laws and regulations, and BLM planning policy.

The document and the BLM acknowledge that the public overwhelmingly identified continued use of the area for recreation as the overwhelming number one issue, yet the agency failed to include that priority in the purpose and need. The document also fails to address the public's number one issue, which is continued access to CCMA for recreation.

This needs to be placed in the PURPOSE AND NEED

Enhance and maintain the public's access to high quality recreational opportunities, satisfying the overwhelming increased demand for use of public lands for recreation. Maintain CCMA's historic use of providing a unique and challenging recreational opportunity for OHV's

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Comment 18 define Asbestos

The purpose and need statement (□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.) needs to be rewritten to better define the word ASBESTOS . The EPA talks about “asbestos” but does not make the difference in between the types Chrysotile and Amphibole.

San Francisco is perhaps the most contaminated large city in the world with “asbestos”. Other towns in California exceed San Francisco, but don’t have 8 million plus people exposed daily as the Bay area does. The idea that all fibers are equal, leads to San Francisco being the most deadly place in America.but it is not. It is not because the asbestos there is Chrysotile. We have not seen any environmental deaths in any other hundreds of Chrysotile towns in America. Yet when we get to Tremolite, the deaths simply jump out at the casual observer.

So, for over 30 years EPA has spent most of its time and energy and all of its money on Chrysotile asbestos sites, because on the surface, they look to be the worst. They have done this even though dozens of scientists have told them repeatedly and all of the data has shown, they should be spending money on amphibole sites and stopping those exposures. EPA and ATSDR ignored this and ignore it today. 95% of all asbestos is Chrysotile, but over 90% of all deaths are driven by Amphiboles. Thought out this document (Draft RMP/EIS) the word ASBESTOS has been used to describe both chrysotile and amphiboles as naturally occurring asbestos which is an oxymoron there is no natural asbestos .asbestos is a manufactured product. The only natural material in question is the serpentine rocks at CCMA that are made up of mostly chrysotile deposits.

The new information has no fair conclusions upon exposures to natural chrysotile deposits when all the EPA’s information is based on Amphiboles type of asbestos. If this Purpose and need statement is to be left in the draft it needs to be changed to something that has to do with contamination of amphiboles asbestos products brought into CCMA not the chrysotile deposits in the serpentine soil that’s there.

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Comment # 17 Bulk

3.15.4.4 BLM Contribution to the Local Economy

This whole section is not relevant to CCMA because it tries to generalize too much by adding other public lands administered by the BLM, Forest Service, the National Park Service, and California State Parks into the discussion. It is all meaningless assumptions or unrelated facts just bulk that is outside the scope of this document, the whole thing should be deleted.

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Comment 19 No No Action

4.2.3 Overview of Impacts of Hazardous Materials on Public Lands

In general, all the hazardous materials and public safety management actions in the range of alternatives would contribute to meeting the BLM's goals and objectives, because they are designed to improve the overall environmental resource protection and public safety for public land uses. However, the No Action Alternative would have major negative impacts to public health and safety by increasing the public's long-term risk of contracting cancer associated with exposure to asbestos from CCMA.

This is conjecture, since other scientific literature states otherwise. Only the EPA report comes to this conclusion. this shows no balance in the accurate scientific analysis.

Delete the above statement from the document.

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Substantive Comment EPA report

I now know why the EPA did not try to enforce any action to close CCMA to the public. After reviewing the EPA doc PTT-HHRA-1992 It becomes very clear, the EPA had to remove the statistical information from three of the most germane studies, the ones about the mill and mine workers at CCMA because if they were to leave those statistics in the URF (unit risk factor) became so small that it fell off the charts the risk became below zero, and that was not what they wanted to see.

By their own admission the EPA (page 28, 29 of PTT-HHRA-1992) omitted this information from their risk assessment model; they have rendered this risk assessment of CCMA useless and untrue and cannot be used to address the actual risks at CCMA. (1502.22)

The URF is based on studies of workers exposed to a variety of asbestos types in diverse Occupational settings. However, the URF does not include cancer incidence data from Occupational populations exposed to chrysotile asbestos in mining and milling (U.S. EPA1991a), and these studies may be most relevant to the exposure to chrysotile asbestos at The site. Unofficial URFs (URFs) ranging from 0.0013 (f/cc)' to 0.0047 (f/cc) can (" be derived from data on lung cancer reported in three studies of workers exposed to chrysotile in mining and milling [McDonald et al. (1980); Rubino et al. (1979); Nicholson et al. (1979)]. These URFs were derived by PTI by converting an occupational exposure period of 5 days a week and an inhalation rate of 10m³/8 hour work day to a continuous exposure period. The lowest UURF derived in this way is nearly 200 times less (182 times) than the current URF for asbestos and the highest value is nearly 50 times less than the current URF. Similarly, the UURF derived from data on mesothelioma incidence in a population exposed to chrysotile asbestos in a mining setting is 0.031 (flcc)' (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.

The BLM has accepted the EPA risk assessment without question which is at least an incomplete analysis if not considered corrupted research .With this information the Agency has no rationale for changing the existing Plan and should revert to the existing plan. There is no purpose or need to change the existing plan, and the Emergency Closure should be removed.

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Comment #1

ASSUMPTIONS THAT LACK EVIDENCE

If the health risks was so great that an emergency closer was enacted, why after 18 months of making this RMP-EIS draft and 50 + years of mining, milling, and recreational use in the CCMA area there is no epidermal or forensic evidence to confirm the health risk of naturally occurring chrysotile asbestos from the serpentine soil and rocks to produce any type of cancer? The risk assessment has been taken as a statement of fact, when it is only an incomplete analysis (1502.22) based on some occupational models adjusted to look like they have some sort of meaningful relationship to recreational usage at CCMA. The truth is risk assessment is a fancy way of saying a wild guess of what the future may be. Many times statistics have been used to circumnavigate the truth or lack of it. Statistically it can be shown that there's a higher probability of dying, when driving to and from CCMA than recreating at CCMA. Motorcycle riding is not only a recreation it's also a sport the same as baseball, football, soccer or gymnastics. If the same risk assessments were placed on any of these sports none of them would be below the 1,000,000 to 1 percentage that the EPA is saying must be met to insure the safety and health to the public .The BLM take into consideration a risk assessment that fits the definition of "No Significance "and uses it to exclude any and all alternatives that may have been considered for CCMA. This decision has failed to find a reasonable balance between theoretical information and the value of motor recreation 1502.22(a), (3, and 4).

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Comment 3 NO ACTION ALTERNATIVE

The BLM says this Draft RMP/EIS has been developed in accordance with the National Environmental Policy Act of 1969 (NEPA), and the Federal Land Policy and Management Act of 1976. This document contains the no action alternative, six additional action alternatives, and BLM's preferred alternative.

The CEQ regulations direct that RMP/EIS has a No Action alternative (40 CFR 1502.14(d)). The No Action alternative is the only alternative that must be analyzed in an EIS that does not respond to the purpose and need for the action. In the BLM's alternative "A" there version of a "No Action Alternative" has incorporated no less than 5 major changes to the RMP/EIS which clearly shows no respect of the rules and violates NEPA 6.6.2, ruling concerning the no action alternatives. The BLM defines Alternative A as (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.) When in fact they have added changes in trail use, multimillion dollar wash facility, removed rights of miners to enter their mining claims, added seasonal restrictions, even a plan to reseed the staging areas with evening primrose an endangered species. How can they even consider this a no action alternative?

Hiding all these changes to be made under Alternative A and then saying it's a no action alternative goes to show how the draft is deceiving to the public. The only NO ACTION ALTERNATIVE is to delete this entire draft

The BLM has decided to incorporate their own rules to bypass NEPA in which the BLM can incorporate into any alternative any goals they want with no public or government interference

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