

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. It appears to assume that riders spend most of their time on the major roads in closely spaced groups. Most motorcycle riders spend the majority of the day on single track. Most riders prefer to space themselves far enough apart to allow visibility in dusty conditions.

**Recommendation**

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

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10 MAR -3 PM 12:28  
U.S. BUREAU OF LAND MANAGEMENT  
HOLLISTER, CALIFORNIA 95023

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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 remove the words "The result of the study concluded" and state clearly what was in the actual report. Suggested wording: "The EPA report indicates the risks are uncertain".

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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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