Appendix X - Public Comments on the CCMA Draft RMP/EIS & BLM Responses

This appendix contains a summary of the public comment letters received by the Hollister Field Office from agencies, organizations, and individuals on the Clear Creek Management Area Draft RMP and EIS, and responses to these comments prepared by BLM in accordance with 40 CFR 1504.3.

During the public comment period, which extended from December 4, 2009 to April 19, 2010, 5,657 comment submissions were received from individuals, agencies, and organizations. Many of these were form letters and/or emails containing identical text that had been suggested by environmental interest groups (2,885), private landowners (132), off-highway vehicle organizations (2,177), and rockhounding clubs (12). Each comment letter typically contained multiple individual comments on one or more of the topics addressed in the Draft RMP EIS.

The commenters include federal and state officials; public interest groups; and private citizens. In compliance with the provisions of NEPA and CEQ regulations, public comments on the Draft RMP EIS were assessed both individually and collectively by BLM. Some comments resulted in changes or modifications to the PRMP/FEIS. A summary of major changes made in the Proposed RMP / Final EIS, in response to public comment, is provided in Chapter 1.9.

Pursuant to NEPA, the BLM is only required to provide responses to comments that raise substantive environmental issues under NEPA in this appendix. However, the following sections include a summary of all the comments received during the public comment period for the CCMA Draft RMP and EIS in order to provide an overview of the concerns expressed during the comment period and to demonstrate the BLM decision-makers are aware of these concerns. All the comments received during the public comment period for the CCMA Draft RMP and EIS are included in the administrative record for the CCMA RMP/EIS and are available for review at BLM's Hollister Field Office.

Comments that were not associated with modifications to the PRMP/FEIS may have generated responses to correct readers' misinterpretations, to explain or communicate government policy, to clarify the scope of the PRMP/FEIS, to explain the relationship of the PRMP/FEIS to other documents, to refer commenters to other information in the PRMP/FEIS to answer technical questions, or to further explain technical issues.

Comment summaries and responses to comments are provided in Chapters I, II, & III of this appendix. The comment summaries provide a brief overview of the comments for the reader's convenience in reviewing the responses, and are not intended to provide a complete representation or interpretation of the comment's meaning. BLM's responses are based on the comments in the letters themselves.

Frequently, more than one commenter submitted identical (or form letter) comments; in those cases, comments were grouped together, summarized, and given a single response. Common Responses to Public Comments in Chapter I provide an example of the comment to summarize the issues, followed by a "Common Response" prepared by BLM in accordance with 40 CFR 1504.3.

An alpha-numeric identifier was used to develop the "Comment Code" for each comment letter and/or email received by the Hollister Field Office.

Table X-1 lists the agencies and organizations that submitted comments on the CCMA Draft RMP and EIS. Table X-2 provides a summary of agency and organization comments on the CCMA Draft RMP and EIS. and BLM's responses to these comments.

Table X-3 and Table X-5 list the names (or emails) of people that submitted individual comments or form letters on the CCMA Draft RMP/EIS, respectively. Table X-4 and Table X-6 provide a summary of these comments (or form letters) on the CCMA Draft RMP/EIS and BLM's responses to these comments, respectively.

A legend of "Comment Codes" used to track comments on the CCMA Draft RMP and EIS is provided below.

Comment Code Legend

AG-**NAME**: Agency Comment
ORG-**NAME**: Organization (or Club) Comment
IND-COM: Individual Commenter
BRC-FORM: BlueRibbon Coalition Form Letter
CBD-FORM: Center For Biological Diversity Form Letter
EXT-COM: Request to Extend Public Comment Period
STT-FORM: Save the Trails Form Letter
HVPO-FORM: Hernandez Valley Propoerty Owners Form Letter
HGMC Form Letter: Hobby Gem and Mineral Collectors Form Letter

I. BLM'S COMMON RESPONSES TO PUBLIC COMMENTS

This appendix provides a listing of all the agencies, organizations, and individuals that submitted comments on the CCMA Draft RMP/EIS and a summary of their comments. Each comment summary is followed by a brief response to the substantive issues or concerns regarding the CCMA Draft RMP/EIS.

Note: Public comments reviewed by the Hollister Field Office demonstrate significant effort by several reviewers to understand and evaluate the uncertainties inherent in human health risk asssessments and the time dedicated by these individuals to quantitatively estimate the effects are appreciated and the following responses are given to his detailed comments.

Many of the public comments received on the CCMA Draft RMP/EIS discussed the same issues or environmental concerns. Rather than repeat responses over and over again, "Common Responses" were prepared to address those issues or concerns. Accordingly, the responses to those comments refer the reader to the applicable "Common Response" by identifying the section number and letter for the "Common Response" below to which the comments apply. For example, "Section 1A" provides a response to comments regarding the "definition of asbestos and chrysotile toxicity".

The "Common Responses" are listed briefly below and are provided in full in the following sections:

- Section 1: Non-NEPA/BLM Issues
    - A. Definition of Asbestos and Chrysotile Toxicity
    - B. Amphiboles Detected in EPA Air Samples
    - C. EPA Risk Assessment Methodology
    - D. EPA Risk Assessment Results
    - E. R.S. 2477
    - F. Issues Considered, but Not Analyzed
    - G. General Comments, Non-Substantive
- Section 2: Purpose and Need
    - A. EPA Risk Assessment
    - B. Endangered Species Act
    - C. Social and Economic Conditions
- Section 3: Project Alternatives
    - A. Range of Alternatives

B. No Action Alternative

C. Alternative D

D. Preferred Alternative

- Section 4: Impact Analysis

A. Risk Assessments and Uncertainty

B. Impacts to OHV Recreation

C. Impacts to Other Resources

D. Social and Economic Effects

E. Cumulative Effects

Section 1: Non-NEPA/BLM Issues

Many comments raised concerns that are not environmental issues within the context of the National Environmental Policy Act (NEPA) or are outside the scope of the CCMA RMP/EIS because they are not under the authority or within the jurisdiction of the BLM.

Pursuant to NEPA, the BLM is only required to provide responses to comments that raise substantive environmental issues under NEPA in this appendix. Responses to public comments that are non-substantive, excessive, or outside the scope of BLM's land use decisions for the CCMA are limited to a brief explanation of how the BLM's Draft RMP/EIS and Proposed RMP and Final EIS addressed the comments or the rationale for the proposed action.

The following comments do not raise issues under the National Environmental Policy Act (NEPA) or that are outside the authority of the United States Bureau of Land Management (BLM).

A. Definition of Asbestos and Chrysotile Toxicity

Many public comments suggested the word "asbestos" is being used improperly and questioned whether the reference to a specific mineral is more appropriate.

Example:

ORG-3ROCKS:

According to the United States Geological Survey, "Asbestos is a generic name given to six fibrous minerals that have been used in commercial products." The definition is expanded further in the USGS Open-File Report 02-149 as, "These fibers belong to two mineral groups: serpentines and amphiboles. The serpentine group contains a single asbestiform variety: chrysotile. There are five asbestiform varieties of amphiboles: anthophyllite asbestos, grunerite asbestos (amosite), riebeckite asbestos (crocidolite), tremolite asbestos, and actinolite asbestos." (Virta 2002:5). The EPA asbestos risk assessment is based on 1986 data (EPA 1986) and fails to consider the current EPA opinion which admits that chrysotile is much less potent (EPA 2008), and may, in fact, not be a human health risk.

Response:

Section 4.2.3.1 of the CCMA Draft RMP/EIS and Proposed RMP/FEIS include the definition of asbestos provided by the U.S. Department of Health and Human Services' Agency for Toxic Substances and Disease Registry, and explains that "The two general types of asbestos are amphibole and chrysotile (fibrous serpentine). Chrysotile asbestos has long, flexible fibers. This type of asbestos is most commonly used in commercial products. Amphibole fibers are brittle, have a rod or needle shape, and are less common in commercial products. Although exposure to both types of asbestos increases the likelihood of developing asbestos-related diseases, amphibole fibers tend to stay in the lungs longer. They also are thought to increase the likelihood of illness, especially mesothelioma, to a greater extent than chrysotile asbestos."

While there is some debate within the scientific community regarding the varying potencies of the different types of asbestos relative to certain cancers, there is no debate that all types of asbestos cause cancer and debilitating and fatal non-cancer disease.

B. <u>Amphiboles Detected in EPA Air Samples</u>

Many public comments repeated claims that no amphibole asbestos fibers were previously detected in New Idria Basin and that the amphiboles detected by EPA were a result of mining and other industrial uses in the area.

Example:

ORG-3ROCKS:

The subject Serpentine ACEC is known for its naturally occurring chrysotile deposit, and is known to be free of natural amphibole asbestos fiber.

Response:

By using activity-based sampling, EPA collected air samples which represented exposures over a large geographic area, in comparison to soil samples collected from discrete locations. The air samples were analyzed by Transmission Electron Microscopy, which permitted the identification of fiber mineralogy. Amphiboles were identified in 8% percent of the samples. It is not uncommon for both chrysotile and amphibole asbestos to be found in the same general locations. "…Chrysotile occurs most commonly in serpentinites and serpentinized ultramafic rocks but may also occur in altered or metamorphosed mafic rocks or in metamorphosed carbonate rocks. The amphibole asbestos minerals (tremolite, actinolite, anthophyllite, riebeckite, and cummingtonite-grunerite) also occur in and immediately adjacent to

serpentinites and serpentinized ultramafic rocks and in a variety of other metamorphosed rocks…" John P. Clinkenbeard and Ronald K. Churchill. **Geology of naturally occurring asbestos in California; Geological Society of America, Cordilleran Section, 101st annual meeting; American Association of Petroleum Geologists, Pacific Section, 80th annual meeting** Abstracts with Programs – Geological Society of America, Vol. 37, No. 4, Apr 2005, pp. 37.

C. EPA Risk Assessment Methodology

Comments from Friends of CCMA and many others reflect concerns that the samples used by EPA for the Risk Assessment are skewed toward the dry season, and/or the Risk Assessment does not represent "typical" CCMA user situations.

Examples:

ORG-SCC:

The exposure durations and visits per year do not represent typical CCMA use patterns. The most frequent users of CCMA ride solo or in the lead position. If this was taken into account in the risk calculations, the Assessment would be more accurate and the numbers would be significantly lower.

The air samplers ran continuously and collected samples when the rider was encountering a dust cloud. In actual practice, a rider would avoid or hold his/her breath when traversing a dust cloud. Therefore, the sampling method caused overestimation of actual asbestos exposure.

T*he exposure measurement did not take into account the precautions BLM publishes for riding at CCMA, i.e. "If riding an OHV in a group, spread out along the trail, and don't ride in another rider's dust."*

The Risk Assessment overestimates the speed, distance, and time-spent while riding at CCMA.

ORG-BRC:

The Risk Assessment is flawed because riders spent too much time on Clear Creek Road.

ORG-FOCCMA:

The samples used by EPA for the Risk Assessment are skewed toward the dry season, and the Risk Assessment therefore does not represent "typical" CCMA user situations. The samples do not reflect the distribution anticipated in the Sampling and Analysis Plan.

The results are "atypical" of actual use conditions because photographs taken during the EPA sampling events show that the BLM graded the road prior to the sampling to increase dust production and asbestos exposure levels.

Response:

Recreation use scenarios adequately represent typical use in the CCMA for the following reasons. The visits per year actually came from the 1992 PTI Health Risk Assessment and are based on national recreational survey data and statements of CCMA users. The 30-year exposure duration is standard for recreational exposures per the EPA Risk Assessment Guidance for Superfund. Further, many CCMA users have stated that they have been riding at CCMA for more than 30 years. The risk numbers were expressed in ranges to provide information that users could adjust to their personal exposure experience.

Activity-based sampling has been used for decades to measure exposures in occupational environments and is currently the standard practice for environmental exposures to asbestos. The sampling methods used at CCMA were based on discussions of typical uses that EPA had with BLM rangers and members of the OHV community.

The sample collection was designed to capture typical exposures. Any change in concentration and duration of exposure will change the estimated risk. The EPA risk estimations reflect assumptions about exposure and duration in the context of standard EPA risk assessment methodology. For example, avoiding dust would reduce the exposure to trailing riders and the overall risk of asbestos-related disease.

Certainly, if someone spends an hour riding, the exposure will be less than someone who rides for 6 hours. However, the assumptions about vehicle speed provided in the CCMA Draft RMP/EIS were not a factor in the overall risk calculations because the results are based on the analysis of the air samples collected by EPA riders conducting the Risk Assessment. The estimated speeds were derived by approximating the area covered and dividing by the time the sampler was on the trails. The concentration of asbestos found in the breathing zone during the rides is the important information. Ultimately, the risk factors for an individual may be less or more than those shown in the Risk Assessment, based on individual riding practices and exposures.

The photographs referenced in the EPA risk assessment were taken at the beginning and end of one of the sampling events as the riders were returning to the staging station at the Oak Flat campground. With the exception of the SUV driving/riding scenario, the road riding was only a portion of the total route and therefore only a portion of the exposures measured. It is representative of typical CCMA activity that riders start from the Oak Flat campground and travel on the road a short distance to access the trails. Sampling on the road was minimized for those riders whose air pumps had timed-out before returning to the staging area. All available information indicates that road conditions were typical of usual CCMA conditions. Therefore, BLM and EPA determined that the data used in the Risk Assessment were indicative of typical use scenarios.The Sampling and Analysis Plan charts for the number of samples to be collected at CCMA only included the three days of sampling conducted in November 2004. It was not intended to represent the total samples collected or the seasonal distribution.

To complete the CCMA risk assessment, EPA conducted sampling over 9 days from September 2004 to September 2005. Five of the 9 days were during the winter months, representing moist and wet conditions. Of the sample results used in the Risk Assessment, approximately 50% were from dry sampling days and the remaining 50% were from moist and wet sampling days. As the attached chart (CHART-1C) shows, the EPA results for the dry season and the wet or “moist” season are comparable. There was no significant difference in the concentrations between dry and wet exposures.

In response to public comments, the statement below was inserted into Section 4.2.4.1 (Impacts from Mitigation Measures for Alternatives A, B, C, and D) of this PRMP/FEIS.

Under Alternative A, BLM would continue to enforce seasonal use restrictions to limit vehicle use to major roads in the Serpentine ACEC from June 1 to October 15. Alternatives B and C would further restrict the season of use from December 1 – April 15. Alternative D would allow vehicle use on major roads in the Serpentine ACEC all year-round. Human health risks from airborne asbestos exposure would be similar under all alternatives. Restricting the season of use would have negligible impacts on asbestos exposure and human health risk because EPA’s CCMA AEHHRA (2008) explains that wet weather reduces but does not eliminate exposure. For example, the September 2004 and September 2005 sampling events were conducted under dry conditions, and the November 2004 sampling event was conducted within one week of a two day rainfall event that produced about one inch of precipitation in the CCMA area, and the preceding month of October was very rainy. During the November sampling event, low-lying areas contained standing water, while elevated areas were nearly dry. EPA further explains that

many of the concentrations in the samples from the November event were actually higher than those measured in the September events, leading to a higher overall mean and 95% UCL for the "moist" event. Based on the EPA sampling, it appears that only active rainfall reduces asbestos air concentrations. Reasons why include topographic and soil factors affecting soil moisture such as slope, aspect, permeability, drainage and surface runoff, but further study would be necessary to define the exact conditions necessary to reduce dust generation. Additionally, because precipitation is so variable in the project area, it would be difficult to predict when conditions would typically be wet enough to reduce risk. As a result, seasonal use restrictions would only provide minor benefits for human health.

CHART-1C (below) shows, the EPA results for the dry season and the wet or "moist" season are comparable. There was no significant difference in the concentrations between dry and wet exposures.

CHART-1C: Comparison of Mean and 95% UCL for All Data[1] and Wet Season Data[2] – Riding Positions from motorcycling and ATV riding only.

Concentrations are PCME f/ml as defined in EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (May 2008).

Position	No. Valid Data - All/Wet	No. Detected Data - All/Wet	All Mean	Wet Mean	Difference	Ratio Wet to All Mean	All UCL	Wet UCL	Difference	Ratio Wet to All UCL
Adult Lead	41/20	35/17	0.0673	0.0554	0.0119	0.8232	0.1040	0.1010	0.0030	0.9712
Adult First Trailing	37/20	34/17	0.2480	0.2720	-0.024	1.0968	0.3940	0.3300	0.0640	0.8376
Adult Second Trailing	17/10	16/9	0.5630	0.4800	0.083	0.8526	1.0790	1.2720	-0.1930	1.1789
Child Lead	36/17	33/14	0.0991	0.0971	0.002	0.9798	0.1660	0.1960	-0.0300	1.1807
Child First Trailing	31/14	31/14	0.3830	0.4760	-0.093	1.2428	0.5950	1.2770[3]	-0.682	2.9529
Child Second Trailing	17/10	17/10	0.5410	0.4880	0.053	0.9020	0.6730	0.6770	-0.0040	1.0059

1. All data includes results from Sept '04, Nov '04, Feb '05 and Sep '05.
2. Wet data includes results from only Nov '04 and Feb '05.
3. Maximum result, UCL exceeds max detected.

D. EPA Risk Assessment Results

Example:

AG-DPR-OHMVRD:

The significance and accuracy of the information presented in the Health Risk Assessment is open to debate

The Division believes serious questions have been raised about the Health Risk Assessment, such as identification and differentiation of chrysotile and amphibole asbestos, asbestos-related epidemiology, appropriateness of risk models, and activity based sampling methods.

ORG-BRC:

The EPA calculated health risks in the DEIS are inherently flawed because they are based on the original calculations in the original risk assessment.

Response:

EPA Region 9 used standard and accepted practices for environmental asbestos sample collection, sample analysis, and risk assessment. The EPA Risk Assessment for CCMA was reviewed by members of the Agency's Technical Working Group for Asbestos, the California Department of Toxic Substances Control (DTSC), and the California Office of Environmental Health Hazard Assessment (OEHHA). EPA reviewers and both California agencies agreed with and support Region 9's methods and findings. Domestic and international health and scientific organizations, including the State of California, the EPA, the Centers for Disease Control, the National Toxicology Program, the National Institute for Occupational Safety and Health (NIOSH), the Occupational Safety and Health Administration (OSHA), the World Health Organization International Agency for Research on Cancer, and the International Program on Chemical Safety, have all classified chrysotile asbestos as a known human carcinogen.

Both the IRIS and California OEHHA toxicity values were used to demonstrate the range of possible quantitative estimates. The toxicity values are based on the same dose response studies but EPA's toxicity value is a mean of the dose and the OEHHA value is based on the more health protective upper confidence limit. While there is some debate within the scientific community regarding the varying potencies of the different types of asbestos relative to certain cancers, there is no debate that all types of asbestos cause cancer and debilitating and fatal non-cancer disease.

E. R.S. 2477

Examples:

ORG-3ROCKS:

All of the main arterial highways passing over the subject public lands were clearly established before Congressional passage to the Federal Land Policy Management Act of 1976, which repealed Federal Revised Statute 2477.

[BLM proposes] to decommission or vacate public highways and to otherwise impair public use of historically established road and ways within the subject area.

Decommissioning roads, the county's abandonment of roads, or otherwise vacating roads only effect the government's responsibility to the roads, but in no way impairs the public's right to use or maintain the public road or way (Chollar-Potosi v. Kennedy 93 Am. Dec. 409; Brown v. Stone 69 Am. Dec. 303).

Additionally, the long history of uninterrupted use and enjoyment of the roads and right of way conferred titled to the private property assignees in common, and perhaps in common with the public, and have also established prescriptive right to continue to enjoy the roads and rights of ways (Pierce v. Cloud, 82 Am. Dec. 496; Chollar-Potosi v. Kennedy 93 Am. Dec. 409; Hill v. Crosby, 13 Am. Dec 448).

Historically established public highways within the subject area include, but are not limited to, the roads and trails as marked on the maps tabulated in Table 1 and Table 2 on page 5 of Ray Iddings Substantive Comments; submitted March 3, 2010.

MSBT-LAW:

Per Congressionally enacted Revised Statute 2477, the public has a right of access of roads and highways to facilitate their right-of-way. This document presents various scenarios that would inhibit the right of the public to travel over previously designated public and county roads and highways, in opposition to all rights and privileges granted to members of the public.

Response:

BLM's Proposed Plan and Final EIS does not include proposals to decommission or vacate these public highways, and the proposed restrictions on public use of designated routes within the subject area would allow for continued historical uses except for OHV recreation due to the human health risk identified in Chapter 4 and the EPA Asbestos Exposure and Human Health Risk Assessment (2008).

Under the Proposed Action, BLM would provide rights of ways over the public lands to and from the private properties within the subject area. Under the Proposed Plan and Final EIS, BLM would require private property owners to acquire rights-of-ways (ROWs) for use of routes off the

public highways administered by the County of San Benito. The BLM's authority for administering rights-of ways across public lands was established in Article V of FLPMA, which allows Field Office managers discretion to waive charges and fees for ROWs. These ROWs would not dictate terms of use for private property or public highways which supersede their jurisdiction and BLM would honor valid existing rights for access to private property.

The issues related to R.S. 2477 are outside the scope of BLM's land used decisions for transportation and travel management on CCMA public lands because the U.S. Tenth Circuit Court of Appeals ruled that the validity of R.S 2477 claims can only be determined through the courts.

The following roads; Clear Creek (R1), Mexican Lake (R11), Wildass (R15), and Sawmill Creek (T158) have been informally identified as "County Roads" for a number of years. However, no record exists that San Benito County has a right of way or any legal right to these roads. The BLM has no record that the County established a right-of-way on the 26.1 miles of roads. The County has provided no information to the BLM to assert any rights-of-way and takes no responsibility for the roads, so by default these are Federal roads.

Furthermore, San Benito County abandoned road maintenance on these roads in 1994 and has not conducted maintenance on them for 16 years. Lack of maintenance has resulted in impacts to natural resources, including water quality, habitat for Federally listed species, and public health and safety. Public health and safety are being adversely affected by the lack of appropriate road maintenance, and in fact this has resulted in death and injury to the public. Unlimited use of these roads exposes the public to airborne asbestos and poses a health hazard.

Nevertheless, BLM, existing rights-of-way holders, and private property owners with in-holdings still need reliable access to the area for resource management and other purposes, but are frequently impeded due to the unmanaged condition of the roads. Improper road maintenance can also lead to excessive sedimentation and transport of toxic materials from the CCMA into various watersheds. This is affecting BLM's ability to comply with water quality standards for mercury and sediment within the CCMA. Stream crossings and riparian areas are being affected by the lack of maintenance. A 1995 study by a BLM contractor identified roads within the CCMA as the primary contributor of sediment into watersheds within the area. Maintenance proposed by BLM in the PRMP/FEIS would reduce sedimentation from these roads.

The County's failure to maintain these roads conflicts with resource management goals and the overarching laws and regulations governing BLM. Therefore, under the Proposed RMP, the BLM would assert its' authority and jurisdiction over the aforementioned roads; and the Hollister Field Office would perform maintenance and repairs on the designated routes on public lands in the CCMA from Coalinga-Los Gatos Road to Idria Road. BLM would also continue to provide access on other routes in the CCMA for valid existing rights of way, mining claims, leases, and private landowners. Refer to section 2.3.3 for other management actions related to travel and transportation management.

F. Issues Considered, but Not Analyzed

i. Epidemiological Studies

Example:

ORG-TMC:

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.
ORG-CA4WDC:

Unless and until epidemiological studies definitely prove a risk that is beyond a supposition, the Clear Creek Management Area must be reopened to motorized recreational use. Please strike form the document all reference to health risk until such time as the appropriate epidemiological studies are conducted and prove any other than the current evidence shows – that there is no risk for motorized recreation in the Clear Creek Management Area.

IND-COM-04:

BLM is using the 2008 EPA Asbestos Risk Assessment as evidence when the document is only an assessment. BLM fails to identify there is lacking information that shows scientifically there is an asbestos risk at CCMA. The EPA report fails to show there are any health risks by not providing an Epidemiology report which would back up their data. The BLM EIS must indicate there is no epidemiological information available from the EPA because the EPA finds it too difficult to obtain a valid epidemiological report.

Response:

Excess lifetime cancer risk was estimated using both the U.S. EPA Integrated Risk Information System (IRIS) and the California EPA Office of Environmental Health Hazard Assessment (OEHHA) cancer toxicity values for asbestos.

The EPA Integrated Risk Information System (IRIS) toxicity value for asbestos is derived from epidemiological studies of human fatalities and health effects, not from studies of test animals in the laboratory. Of the 14 epidemiological studies used to derive the asbestos toxicity value, 7 involve 100% chrysotile or predominately chrysotile exposures. While the risk assessment does not predict individual outcomes, there is more confidence that adverse health effects in humans is associated with increased exposure to asbestos.

A discussion of the limits and constraints of the analysis, acknowledging the lack of epidemiological studies specific to CCMA and the importance of this information relevant to

reasonably foreseeable significant adverse impacts is included in Section 4.2.2 of the CCMA Draft RMP/EIS and the CCMA Proposed RMP and Final EIS.

ii. Other Available Information

Example:

MSBT-LAW:

Throughout the NEPA process for the CCMA RMP, HFO has essentially disregarded, or at least ignored, credible scientific data indicating that PCME fibers are located in concentrated areas, which would allow for a more tailored management approach than is available from the range of alternatives presented in the DEIS. It also is apparent that the EPA report fails to sample according to actual riding patterns.

ORG-TMC:

[In reference to a list of documents regarding chrysotile exposure.]

"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."

The EPA also published in December 2008 that Chrysotile asbestos is significantly less potent than amphibole asbestos, a position also held by the World Health Organization. Even though this was published prior to the release of the DEIS, this change in stance by the EPA is not reflected in their report.

Response:

As indicated by the August 2008 Scoping Report for the CCMA RMP/EIS, BLM and EPA are aware of the documents referenced in the public comment letters. The EPA toxicity factor for asbestos is based on the review of 14 epidemiological studies of asbestos-related disease and death and combines risks from both lung cancer and Mesothelioma. While there is debate in the scientific community regarding the mode of asbestos toxicity, there is no debate among health experts and agencies that chrysotile asbestos exposure causes cancer and non-cancer disease.

EPA expressed concerns about the technical deficiencies of the 1992 PTI health risk assessment during the revision of the Hollister RMP in 2004. Specifically, EPA stated "the [2004] DEIS continues to rely on an inadequate 1992 health risk assessment … EPA's preliminary data indicate a potentially higher risk to OHV users than BLM's 1992 risk assessment. EPA's complete evaluation will sample a range of conditions and analyze all samples with transmission electron microscopy (TEM) analysis. TEM analysis is better able to resolve fiber types and dimensions than phase contrast microscopy (PCM), which was used in the 1992 risk assessment."

Furthermore, EPA's comments on BLM's 2004 DEIS identified the need for additional information regarding the potential health risks to children and smokers, stating that "young children exposed to asbestos in the CCMA have a higher risk of developing mesotheliorna during their lifetime than older adults because the latency period for developing this cancer can be 30 to 40 years."

Therefore, BLM agreed to work with EPA and the public upon completion of the study to incorporate the new health risk information into public land use decisions for the area. (DEIS pg. 1) Accordingly, The purpose and need for the CCMA Draft RMP/EIS states that "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." (DEIS pg. 4)

In 2008, EPA requested that the external Science Advisory Board (SAB) review an approach to address toxicities from various mineral forms of asbestos. The objective of the proposed approach was to investigate the influence of asbestos mineral types and fiber dimensions on estimates of cancer potency derived from epidemiological data. The Board agreed that mineral type and dimension are important determinants of asbestos toxicity, and that an effort to examine the relative contributions of these characteristics to asbestos toxicity was worth pursuing. However, the Committee found that the available exposure data was not robust enough to support the effort EPA proposed. In light of the Board's concerns, the EPA Office of Solid Waste and Emergency Response decided not to pursue the effort

.

The effort to examine the toxicity of various asbestos mineral forms and dimensions was in no way predicated on scientific evidence that chrysotile asbestos is benign. On the contrary, the evidence continues to support EPA's position that chrysotile is a known human carcinogen and causes debilitating and fatal non-cancer disease. The serious health impacts of chrysotile exposure are recognized by the Centers for Disease Control, the Occupational Safety and Health Administration, the National Institute of Occupational Safety and Health, the World Health Organization International Agency for Research on Cancer, and others. Recent follow-up studies of North Carolina textile workers confirmed the strong relationship between estimated exposure to chrysotile and mortality from lung cancer and asbestosis. M. Hein, L. Stayner, E. Lehman, J. Dement. *Follow-up study of chrysotile textile workers: cohort mortality and exposure-response* Occup Environ Med 2007; 64:616-625 doi: 10.1136/ oem.2006.031005. Additional studies of the textile workers confirmed "that workers exposed to chrysotile are at increased risk of mesothelioma, as well as lung cancer." Loomis D, Dement JM, Wolf SH, Richardson DB. *Lung Cancer Mortality and Fiber Exposures among North Carolina Asbestos Textile Workers*, Occupational and Environmental Medicine, published online March 11, 2009 by the BMJ Publishing Group Ltd.

G. General Comments, Non-Substantive

Comments related to the existence of typos and quotation marks used to place emphasis on specific terms used in the CCMA Draft RMP/EIS are non-substantive and do not inhibit meaningful analysis because the document provides the purpose and need for the Draft RMP/EIS, includes a reasonable range of alternatives, and describes the affected environment and the environmental consequences of alternative management actions for the CCMA

Similarly, comments regarding the general public's ability to assimilate and provide germane comments due to the format and length of the document do not exclude individuals that would otherwise be able to provide comments.

Response:

These comments do not raise environmental issues under the National Environmental Policy Act (NEPA), provide general comments or statements without raising a specific environmental question, and/or represent an opinion of the commenter that does not raise issues under NEPA. In compliance with NEPA, the BLM prepared a Final Environmental Impact Statement (FEIS) and that FEIS will be available to the public for 30 days. After publication of the FEIS and after consideration of the comments received on the DEIS, including comments regarding the EPA Risk Assessment, possible BLM actions related to public health and safety or other environmental issues, the BLM may select an alternative and set forth its approval in a Record of Decision (23 Code of Federal Regulations [CFR] 771.127) along with a summary of the adverse impacts of the proposed action and avoidance, minimization, and mitigation measures incorporated into the Record of Decision (ROD) to complete the environmental process under NEPA.

Section 2: Purpose and Need

The purpose and need for the CCMA RMP/EIS, as described in Section 1.0, is consistent with the Federal Land Policy and Management Act (FLPMA; 43 United States Code [USC] 1701) and satisfies the requirements of the National Environmental Policy Act (NEPA). Therefore, the BLM's purpose and need statement for the CCMA RMP/EIS was not revised in response to public comments. Specific responses to public comments related to the project purpose and need are provided in the following sections.

A. <u>EPA Risk Assessment</u>

Many comments suggest that the purpose and need is flawed based on the significance of the results of the EPA risk assessment.

Example:

ORG-SRMC:

The BLM has not provided any facts in the DEIS to support the statement that there is a significant health risk of recreating in the CCMA as evidence by incidents of disease.

While the EPA's CCMA Asbestos Exposure and Human Health Assessment (2008) provides new information, it does not provide information so compelling that it warrants the emergency closure or the severe restrictions on OHV use proposed in the preferred alternative.

Example:

IND-COM-140:

The 2008 EPA Assessment has not provided the "substantial new information" as stated in the 2009 DEIS/RMP. The assessment has not provided conclusive evidence that there is a real risk to users of the area and there are numerous issues with the data collected and used (in common scientific terms "garbage in equals garbage out"). It is this author's opinion that based on the above, the BLM has not proved a need for the current "emergency closure" and subsequent preparation of the 2009 DEIS/RMP. As such, the 2009 DEIS/RMP needs to be declared null and void, the area needs to be reopened immediately, and the BLM shall manage the CCMA under the current record of decision and amendments.

Should the BLM elect to provide additional education outreach to users of the area and/or provide mitigation such as armoring of main roadways, I believe this would fall under an amendment to the current ROD, but does not warrant the need for a new EIS/RMP.

Response:

EPA Region 9 used standard and accepted practices for environmental asbestos sample collection, sample analysis, and risk assessment. The EPA Risk Assessment for CCMA was reviewed by members of the Agency's Technical Working Group for Asbestos, the California Department of Toxic Substances Control (DTSC), and the California Office of Environmental Health Hazard Assessment (OEHHA). EPA reviewers and both California agencies agreed with and support Region 9's methods and findings. Domestic and international health and scientific organizations, including the State of California, the EPA, the Centers for Disease Control, the National Toxicology Program, the National Institute for Occupational Safety and Health (NIOSH), the Occupational Safety and Health Administration (OSHA), the World Health Organization International Agency for Research on Cancer, and the International Program on Chemical Safety, have all classified chrysotile asbestos as a known human carcinogen.

The EPA Superfund program defines the acceptable risk range for exposure to a carcinogen, like asbestos, as 1 in 10,000 (10-4) to 1 in 1,000,000 (10-6) excess lifetime cancer risk[1]. Exposures which are calculated to cause more than 1 in 10,000 excess cancers, like those evaluated in the EPA study and the CCMA Draft RMP/EIS are considered to be of concern and may require action to reduce the exposure and resulting risk. Therefore, the BLM believes that the purpose and need for the RMP/EIS, as discussed in Section 1.0 in the FEIS, is consistent with the directives described under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as the Superfund Act.

B. Endangered Species Act

Many comments suggest that the purpose and need statement's reference to the listing and/or additional habitat needs species protected under the federal 1973 Endangered Species Act (ESA) is not supported by existing knowledge and information available about listed species occurring within the area and the suitability of the habitat on public lands in the CCMA.

[1] 40 CFR Part 300, National Oil and Hazardous Substances Pollution Contingency Plan, section 430(e)(2)(i)(A)(2), "For known or suspected carcinogens, acceptable exposure levels are generally concentration levels that represent an excess upper bound lifetime cancer risk to an individual of between 10^{-4} and 10^{-6} using information on the relationship between dose and response..."

Example:

IND-COM-140:

The 2008 DEIS/RMP has erroneously listed [needs for species protected under the federal 1973 Endangered Species Act (ESA),] as a need for the document. As such, the 2009 DEIS/RMP needs to be declared null and void, the area needs to be reopened immediately, and the BLM shall manage the CCMA under the current record of decision and amendments.

IND-COM-97:

The Bureau of Land Management has failed to show a cause for action necessitating inclusion of the California Condor in the resource management plan or the environmental impact statement. The BLM has also failed to show a significant Purpose and Need for this discussion in the management plan or environment impact study, or how CCMA recreation affects the California Condor habitat.

Response:

The CCMA Draft RMP/EIS (2009) and this CCMA PRMP/FEIS both say that there are no known occurrences of the California red-legged frog or the California tiger salamander on public lands in the decision area. Nonetheless, the CCMA is well within the range of these species, as well as the endangered California condor and other listed plant species (or candidates proposed for listing) including the San Benito evening-primrose and Rayless layia, respectively.

BLM has a responsibility under the Federal Land Management and Policy Act (FLPMA), and the Endangered Species Act (ESA), to address species listings and habitat needs for these species even if it's just to confirm that the BLM proposed actions would have no effect on listed species because they are not present in the CCMA. Furthermore, consultation with the United States Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS) is required if BLM land use decisions may affect listed species and designated critical habitat, to ensure that actions taken are not likely to jeopardize the continued existence of any threatened or endangered species or their critical habitat.

Section 3.6.4 describes the resources conditions for these species and the BLM's progress in identifying areas of ecological importance and the purpose and need for the CCMA RMP/EIS reaffirms priority species and habitats, and identifies restoration strategies, opportunities, and management decisions to protect or prevent avoidable loss of habitat supporting special status species within each of the management areas.

BLM has expended considerable effort in species-directed inventories throughout the CCMA, particularly as part of efforts to delist the San Benito evening-primrose, of which the HFO administers the majority of known occupied habitat for the species. Important new information regarding the status of this species has been added to the PRMP/FEIS to analyze impacts to San Benito evening primrose and its' associated habitats under the range of alternatives and the proposed action.

In light of the public comments about the relationship of the ESA to the CCMA RMP and lack of habitat for California red-legged frogs and tiger salamanders in the CCMA, the purpose and need

has been modified in the PRMP/FEIS to emphasize the need to consider new information regarding the San Benito evening primrose and habitat needs for California condor. Otherwise, BLM believes that the purpose and need for the RMP/EIS, as discussed in Section 1.0 in the FEIS, is consistent with the directives described under the ESA.

C. Social and Economic Conditions

These comments requested that the purpose and need be broadened and that additional alternatives be identified based on the broader purpose and need.

Response:

The purpose and need for the project provided Chapter 1.0, Introduction and Purpose and Need, in the Final Environmental impact Statement (FEIS) is based on two key considerations, as stated under Section 1.4 Planning Criteria (DEIS, pg. 9), "Principles of ecosystem management as well as a continuing commitment to multiple use and sustained yield will also guide land use decisions in the Planning Area. The commitment to multiple uses would not mean that all land would be open for all uses. Some uses may be excluded on certain lands to protect specific resource values or uses. Any exclusions, however, would be based on laws or regulations or be determined through the planning process and subject to public involvement.

As discussed in Chapter 2.0 (FEIS Section 2.5), a range of alternatives (A-G), were evaluated in detail in the Draft RMP/EIS and included multiple public use scenarios in the Serpentine ACEC: five of which entailed Motorized access (Alternatives A, B, C, D, and E), one Non-motorized access alternative (Alt. F), and one alternative that considered closure of the Serpentine ACEC to all forms of public entry (Alt. G).

In general, the CCMA Draft RMP/EIS range of alternatives analyzed combined management actions, resource allocations, and allowable uses that BLM considered reasonable based the purpose and need for the CCMA RMP/EIS and the issues identified during the public scoping period.

The suggestion that the project purpose should be expanded to "…focus on the need to enhance OHV opportunities outside of CCMA…" is outside the purview of the BLM. Clearly, the primary action that BLM is considering is related to responding to the EPA Risk Assessment and the need to address the risk to visitors on public land managed by the BLM. As a result, the BLM determined that a key purpose of this project was to revise existing land use decisions to reduce human health risks from exposure to asbestos and minimize airborne asbestos emissions from BLM management activities in the CCMA.

Accordingly, BLM considered seven alternatives, including the No Action Alternative, as described in detail in Chapter 2.0 of the CCMA Draft RMP/EIS. These alternatives were considered in the Draft RMP/EIS but were not carried forward for detailed evaluation in the FEIS as explained at the beginning of Chapter 2.0. Refer also to Common Responses, Section 3 (A-C), for BLM responses to comments in the PRMP/FEIS for additional discussion of alternatives considered in the Draft RMP/EIS and why these alternatives were either not considered or were considered but not carried forward for detailed analyses in the FEIS.

Section 3: Project Alternatives

A. Range of Alternatives

Example:

AG-DPR-OHMVRD:

The Division is concerned all relevant alternatives and other impacts are not thoroughly addressed within the Draft RMP/EIS. In particular, the Draft RMP/EIS offers no consideration to viable options or substitutes for the CCMA recreational opportunities. Instead, the establishment of new OHV recreation areas outside the CCMA is relegated to the Section 1.3.3 — "Issues Considered but Not Further Analyzed" (page 8). The subsequent suggestion in the Draft RMP/EIS (page 9) that the Hollister Field Office and OHMVR Division work together at a later date to find additional OHV recreation areas elsewhere in the Hollister Field Office, while a welcome proposal, is seemingly counter to the scope of the document and not a satisfactory solution. In fact, the Hollister RMP offers no OHV recreational opportunity on par with the CCMA.

ORG-AMA36

Creation of a viable, challenging and long term sustainable trail system at the CCMA has long been the goal of many in the riding community. Access to privately held lands, opportunities for other motorized recreationists as well as protection of the resources are all part of a well developed and managed facility, and something the public has repeatedly requested and demonstrated a willingness to support.

Indeed direct financial support (day use permits, annual passes and OHV grants) as well as volunteer efforts (such as fencing of threatened and endangered species) had been ongoing until the emergency closure was implemented. The agency has a ready partner but has simply not taken full advantage of the opportunity presented. As a result of this deficient process one or more viable, if not superior, alternatives have been omitted from the DEIS.

MSBT –LAW:

Every alternative in the DEIS contemplates further restriction on access to roads and trails and areas by motorized means. It is apparent from the DEIS that the purpose and need for the project is to minimize asbestos exposure and reduce asbestos emissions. DEIS at Executive Summary p. III. Thus, the DEIS accepts as a foregone conclusion that the CCMA is hazardous enough to justify limiting but one factor in exposure, based on questionable science.

Thus the purpose and need, from which the range of alternatives flow, illegitimately creates a range of alternatives that precludes meaningful analysis. Every alternative, save the no action alternative, results in significant limitations on motorized recreation access. Thus, the decision-making paradigm is constrained to options that rely on achieving the purpose and need through a single means: limiting recreational access. Hazards exist throughout the public lands; not every one can be identified, evaluated, and protected against. Even assuming that the underlying

science conclusively demonstrates the conclusion for which it is accepted, a range of alternatives that aims solely to reduce access precludes consideration of legitimate alternative means to achieve the result. In sum, the range of alternatives, and the preferred alternative, derive from an erroneous premise and result in the impossible enterprise of closing areas based on unknown hazards.

The DEIS's range of alternatives fails to address reasonable alternative mitigation measures and instead favors closure to achieve its goal. However, numerous alternative mitigation measures exist and have been presented to the HFO; BLM cannot summarily disregard, without analysis, these reasonable alternatives.

Response:

The Hollister RMP (2007) considered viable options for motorized recreational opportunities in the remaining areas beyond the bounds of CCMA. The CCMA Draft RMP/EIS also includes a range of alternatives that considers viable options for motorized recreation opportunities both inside and outside the Serpentine ACEC based on the purpose and need described in Chapter 1.

Pursuant to 40 C.F.R. § 1502.14, the BLM's Hollister Field Office conducted multiple public scoping meetings and interdisciplinary team discussions to rigorously explore and objectively evaluate all reasonable alternatives in the CCMA Draft RMP/EIS. Numerous interested parties, including a consortium of OHV organizations and clubs participated in the public scoping meetings and helped generate the range of alternatives analyzed in the CCMA Draft RMP/EIS.

As a result, five out of the seven alternatives analyzed in the CCMA Draft RMP/EIS (Alternatives A - E) incorporated technical and administrative measures to improve monitoring of meteorological conditions, airborne asbestos emissions, and CCMA visitor use in order to enable limited OHV use in the planning area.

B. <u>No Action Alternative</u>

Example:

ORG-CA4WDC:

Per the CEQ Forty Questions, (CEQ 40 CFR 1502.14), a no-action alternative must contain the following: "This analysis provides a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives. It is also an example of a reasonable alternative outside the jurisdiction of the agency which must be analyzed. Section 1502.14(c)".

There is little to nothing in this document that qualifies under a no-action alternative because every piece of evidence contained in the document is contaminated by the results of the 2008 EPA study and it's conclusions. All alternatives in the document contain the assumption of risk implied in the EPA report. A true no-action alternative would not be prejudiced by questionable conclusions contained in the aforementioned report.

Alternative A, represented in the document as the no-action alternative actually incorporates changes due to the assumption of risk. Therein lies the crux of the problem – there is no true no-

action alternative, therefore the document does not comply with CEQ regulations. Please rewrite the document to show a true no-action alternative not tainted by the 2008 EPA study.

Response:

Pursuant to 40 C.F.R. § 1502.14, the BLM's Hollister Field Office conducted multiple public scoping meetings and interdisciplinary team discussions to rigorously explore and objectively evaluate all reasonable alternatives in the CCMA Draft RMP/EIS. Numerous interested parties, including the consortium of OHV organizations and clubs participated in the public scoping meetings and helped generate the range of alternatives analyzed in the CCMA Draft RMP/EIS.

The CCMA Draft RMP and EIS clearly explains that the "No Action" alternative is based on the existing land use plan decisions that were in place prior to the May 1, 2008 Temporary Closure Order for the CCMA Serpentine ACEC (pg. 19).

The following statement (referenced above) also reappears in the CCMA Proposed RMP and FEIS, "**Alternative A** *represents the 'No Action' alternative required by NEPA, and would reaffirm current management under the original Hollister RMP (BLM 1984) and its' associated Clear Creek Amendments (1986, 1999, 2006)*. Alternative A does not take into account the temporary closure of the Serpentine ACEC. Management of recreation opportunities, special status species habitat, and other resources would be maintained at existing levels prior to the May 1, 2008 closure order. This alternative would not modify allowable uses to address emerging issues on public lands; however, this alternative would incorporate new human health risk information into BLM's public outreach and education asbestos hazard information program and new guidance for management of natural and heritage resource, rangelands, energy and minerals, and lands and realty established after the 1984 Hollister RMP, as amended."

C. Alternative D

Examples:

ORG-CORVA:

The draft RMP-EIS does not provide adequate discussion of Alternative D that would allow a reasoned choice between alternatives. The draft RMP-EIS must be revised to include an adequate discussion of the issues related to Alternative.

The analysis provided in the draft RMP-EIS is inadequate because Alternative D is not given fair and thorough discussion and is not established as a reasonable and viable alternative. The draft RMP EIS cites a previous study of the Cantua area but provides only the most limited discussion of the results of the study and how they might apply to motorized recreation in the adjacent CCMA.

To summarize, the draft RMP-EIS provides contradictory statements related to the availability of public access to the Condon Peak and Cantua zones and little if any information about possible public access to the Tucker Mountain zone. The maps provided indicate that two alternatives, D

and E, include development of recreation sites in the Condon and Cantua zones and that public access from New Idria Road and Los Gatos Road is planned for these areas. But there is no discussion of why recreational opportunity for off highway vehicles should be included or excluded for these areas. This is a key element of alternative D, yet any discussion of this element is lacking.

Response:

The Draft RMP/EIS analyzed potential impacts of Alternative D in Chapter 4. Resources issues that were identified included potential for additional disturbance of asbestos bearing deposits in the Condon and Cantua areas. Information to support this statement is included in the CCMA Draft RMP/EIS and Proposed RMP/FEIS in Appendix I, Map 5, which illustrates the location of serpentine (and serpentine-derived) soils based on soil survey results for San Benito County.

Other concerns identified in the CCMA Draft RMP/EIS related to increasing and/or improving motorized access to CCMA public lands outside of the ACEC for recreation opportunities are addressed in Section 4.4.6.2 (Vegetation), 4.6.6.2 (Special Status Species) 4.8.6.2 (Soils), and 4.9.4.2 (Water).

The analysis of new OHV recreation opportunities in the Tucker zone is limited because vehicular access to the BLM public lands in this area does not currently exist and is not reasonably foreseeable.

D. Preferred Alternative

Example:

ORG-SCC:

The EIS must not specify a preferred alternative that clearly does not satisfy the Purpose and Need and which is not the best alternative according to the… vast majority of the public.

Example:

ORG-VWA:

CCMA and surrounding management zones are too vast, rugged and remote to be managed for off road vehicle recreation. Furthermore, the diverse soils that support rare and sensitive biological resources are unsuitable for intensive and newly developed OHV recreation activities.

[However,] limitation to the Idria - Spanish Lake road does not provide adequate access to Clear Creek where both rock hounds and botanists find highly desirable. We believe that the public should be allowed to drive ("tour") through the CCMA on all of the county roads and access this beautiful area for passive recreational uses (such as hiking, birding, photography, scientific research, rock hounding), including within the Serpentine ACEC.

We strongly encourage BLM to work with San Benito and Fresno counties to resolve the access and maintenance issues of the county roads for non-consumptive uses. The Idria Road is impassable to standard vehicles which would unfairly limit access to the CCMA.

We request that the Clear Creek Road and entrance be kept open. ALT E should be modified to include the all of the County Road Network. We suggest that the county road network be open year round to highway (touring) vehicles with permits required in the dry season.

Response:

The Clear Creek Management Area (CCMA) is an area of naturally occurring asbestos. Asbestos is a known human carcinogen. EPA's Clear Creek Management Area Asbestos Exposure and Human Health Risk Assessment (2008) determined that the asbestos exposures for many recreational activities at CCMA exceed the acceptable risk range for carcinogens. The EPA risk assessment also led to the following conclusions about asbestos exposures and health risks at CCMA: (1) the higher the asbestos exposure, the higher the risk of developing asbestos-related disease; (2) reducing the exposure to asbestos will reduce the risk of developing asbestos-related disease; and (3) children are of special concern because in a majority of activity-based samples at CCMA, the concentration of asbestos measured in the child's breathing zone exceeded the asbestos concentration in the companion adult sample. Furthermore, a child's life expectancy exceeds the latency period for asbestos-related disease.

In light of these considerations, the BLM's "Preferred Alternative" best meets the purpose and need identified in Chapter 1 of the CCMA Draft RMP/EIS because it would help protect human health and safety by reducing exposure to airborne asbestos fibers and significantly improve environmental resources at CCMA by minimizing asbestos emissions associated with BLM management acitivities.

Based on public comments, the BLM's "Preferred Alternative" was modified in the Proposed RMP and Final EIS to include 32 miles of designated routes in the Serpenetine ACEC that would be limited to highway-licensed vehicles. These routes include all of the former county roads in CCMA. Additionally, the Draft RMP/EIS's "Preferred Alternative" and the Proposed RMP/FEIS's "Proposed Action" both establish goals, objectives, and management actions for BLM-administered lands in CCMA that address current issues, knowledge, and conditions and designate areas in CCMA for motorized, mechanized, and non-motorized/non-mechanized recreation opportunities; protect sensitive natural and cultural resources from impacts due to recreation and other land uses; provide guidance for mineral and energy development; as well as other land use authorizations and tenure adjustments.

E. Alternatives Considered, but Not Analyzed in Detail

Example:

ORG-TMC:

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.

Response:

The Draft RMP/EIS explains on page 20 that the alternative to designate CCMA an 'open' area for OHV use was considered, but not analyzed 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)".

Section 4: Impact Analysis

A. Risk Assessments & Uncertainty

Example:

MSBT-LAW:

There is unquestionable uncertainty in the EPA's own report regarding the actual conditions; ergo, its sampling, testing, and conclusions do not necessarily correctly characterize the risk.

The DEIS fails to address the ambiguity of the data, and therefore, in sum, the DEIS fails to take the requisite "hard look" at the data it accepts as true, thus failing to consider an important aspect of the problem.

Response:

Section 4.2.2 of the CCMA Draft RMP/EIS addresses the Limits and Constraints of the Analysis, including but not limited to Incomplete and Unavailable Information (4.2.2.1), and Exposure and Risk Uncertainties (4.2.2.2).

> "The assessment of risk as a probability of an outcome always has unknown values that are estimated in health protective ways to ensure that the risks are neither underestimated nor grossly overestimated. The largest uncertainty in the assessment of risk to users of CCMA is that the risk evaluation only assesses excess lifetime cancer risk. It is known that asbestos causes debilitating and fatal diseases other than cancer, such as respiratory and pleural disease. The non-cancer effects are not quantitatively taken into account in the assessment because there is no asbestos toxicity value for non-cancer health effects, even though non-cancer effects could actually be more significant to total disease outcome from CCMA asbestos exposure. Therefore, the general probability of developing disease from exposure related to activities at Clear Creek may be significantly underestimated in the report. Uncertainties related to the exposure parameters in the CCMA assessment that could cause the estimated risk to be less or greater than the actual risk include: the frequency of exposure and the time actually engaged in dust-generating activities; the effect of the exposures on children; and the representativeness of the areas used for the sampling as accurate models of typical CCMA conditions. One exposure that was not measured, and which could cause the exposure and risk to be higher, is the continued exposure that results when asbestos fibers from CCMA are taken home in vehicles and on equipment. 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. Another uncertainty, adjustments for early lifetime childhood exposures, could mean that the actual risks are higher than those estimated in the report."

There are many comments that confuse uncertainty related to Risk Assessment with variability and imprecision. The caveats and uncertainties discussed in the EPA risk assessment are included in the report to notify the reader of the bounds to the estimates. The actuarial data is not in question. Disease and death result from asbestos exposures, and the variability presented is only in the magnitude of the cancer effect and the possible range of estimates. In fact, the EPA findings were consistent with previous exposure studies conducted at CCMA. Full disclosure of the uncertainties is standard in Risk Assessments and does not invalidate the overall finding that the asbestos exposures at CCMA, and the attendant risks, are significant.

B. Impacts to OHV Recreation

Example:

ORG-SCC:

The negative impacts of reducing OHV recreation opportunities in the CCMA are not adequately discussed in the EIS. These include important impacts to other federal and state lands designated for OHV recreation. Such impacts are directly relevant and must be included in the CCMA RMP/EIS because the CCMA RMP/EIS process has immediate and predictable consequences and impacts to these other lands, and directly and significantly affects current and potential users of the CCMA.

Response:

The Draft RMP/EIS analyzed the impacts to OHV recreation in Chapter 4.1.2.2, and specifically acknowledges "the proposed action would have major long term adverse impacts to OHV (motorized) recreation opportunities in the ACEC because the miles of routes and trails available for OHV use would be reduced by more than 75%."

The Draft RMP/EIS and Proposed RMP/ FEIS also describe "minor long-term adverse effects on other existing recreation resources due to limits on annual visitor use days in CCMA", as well as indirect impacts related to the proposed action. As suggested by SaveClear Creek.org, the BLM recognizes that as restrictions on allowable uses increase and recreation opportunities decrease, "These restrictions would displace thousands of OHV recreationists, who would end up seeking OHV recreation opportunities in other County, State or Federal recreation areas. Many of these other areas are smaller than CCMA and additional visitors would contribute to overcrowded conditions and additional impacts to the human environment in those areas. Overcrowding can lead to increased conflicts among user groups, decreases in recreational quality and experience, and adverse impacts to other resources like vegetative cover, wildlife habitat, soil loss and erosion, and water and air quality."

C. Impacts to Non-ACEC Zones

Examples:

AG-SJVRCD:

Given the fragility of the soils in the upper Los Gatos Canyon watershed, the construction and use of new dirt roads in the upper Los Gatos Canyon watershed would cause a huge increase in soil erosion and sediment loads in Los Gatos Creek.

With regard to air quality, the dust stirred by off-road vehicles, the fine particulate matter emitted by their engines and the emissions of oxides of nitrogen from their engines are all harmful to human health…. To knowingly increase fugitive dust, PM 2.5 engine emissions, and oxides of nitrogen by establishing new ORV roads and campground facilities for new and renewed off-road vehicle use in the Coastal Range amounts to a willful disregard of the resulting respiratory illness among our most vulnerable Valley residents.

IND-105:

The serpentine landscapes are easily abused. On the barrens lichens, mosses, and plants that are able to tolerate shallow, nutrient poor soils take years to form in the harsh climate. They are fragile, easily uprooted. Open OHV use on these unique geologic features causes devastation that may never be restored.

Clear Creek Management Area (CCMA) was visited by hikers, naturalist, rock hounds, and people just looking for a unique and beautiful place to visit. Don't close the main Clear Creek Road to the people that use the area responsibly.

As for a recreational staging area at the Condon Peak access and new roads including a road to Condon Peak I am strongly opposed. We need areas where there are no roads only hiking trails. The area is used by hikers, hunters, rock hounds, and naturalist including bird watchers and botanists. It would be impossible for BLM to keep OHV use out of the area, and would provide access for traffic to the red zone. Law enforcement would need to be upgraded and constant. The soil in that area is highly erodible adobe, not suited for a staging area.

Response:

Soils of the CCMA are introduced and described in the CCMA RMP Chapter 3.8 (includes Soils Map 5) and analyzed in Chapter 4.8. Table 3.8-1 and Map 5 identify soil series of the CCMA and factors important to soil erosion including slope, permeability, surface run-off class, and erosion hazard.

Under the proposed action, BLM would prepare separate Travel Management Plans to designate routes outside the ACEC for vehicle use and identify appropriate mitigation measures to alleviate the effects to public land resources using the screening criteria and route designation methodology described in Appendix II.

Routes and trails to be considered in these Travel Management Plans would be designed to minimize surface disturbance associated with management activities and visitor use within the serpentine formation and serpentine derived soils known to have high concentration of asbestos fibers.

Construction of any new routes within the CCMA would take soil erodibility into account, resulting in avoidance of soils having high erosion hazard and incorporating erosion control measures into route design. By taking these measures, soil erosion within- and sediment loads to the CCMA watersheds can be reduced.

D. Social and Economic Effects

Examples:

AG-SBC:

Since the temporary closure of the CCMA, significant revenue has been and will continue to be lost adversely affecting local and regional businesses due to the closure. Due to the temporary closure of Clear Creek, the Hollister Hills OHVA is full by 10:00 a.m., and frequently has to turn people away, further hurting the economy of the area, and forcing people to go further away for OHV activity. More analysis should be provided on this important issue, as area businesses and the County are very concerned.
ORG-AMA36:

It is our contention that The DEIS is fatally flawed because it did not properly analyze the socioeconomic impacts to local and regional businesses including restaurants, motorcycle shops, hotels, sporting goods stores, gas stations, and grocery stores. This important omission must be addressed prior to a record of decisions being issued.

MSBT –LAW:

The DEIS fails to adequately account for the socioeconomic and environmental impacts to other areas or the local economies caused by the alternatives, including the preferred alternative, in violation of NEPA. Socioeconomic impacts are characterized in conclusory terms without specific analysis of data to support the conclusions. See generally, DEIS at 520-23.

Response:

The CCMA Draft RMP/EIS and the Proposed RMP and Final EIS present the baseline for current social and economic conditions in Chapter 3.15 and analyze the impacts of the proposed CCMA land use decisions to social and economic values in Chapter 4.15.

These values and the social and economic contributions associated with visitor use activities in CCMA were identified through public scoping and previous CCMA land use planning efforts The HFO conducted additional outreach following the release of the CCMA Draft RMP/EIS through a social and economic workshop to provide information and gather feedback from private landowners, businesses, elected officials, and other interested parties within the communities most directly affected by BLM's land use decisions for CCMA. The information gathered during the social and economic workshop has been incorporated into the affected environment and environmental consequences chapters of the PRMP/FEIS. A summary report of the information

discussed and the public input that was gathered during the workshop is also included in Appendix XI.

E. Cumulative Effects

The comments regarding the cumulative impacts analyses discussed several topics, as suggested below.

Example:

ORG-CA4WD:

Any or all of the [cumulative] effects of closing the Clear Creek Management Area are not evaluated by the DRMP/EIS. Besides the economic effects on local businesses in the affected areas, including Coalinga, King City and Hollister, there are the effects of travel for recreational opportunities to other areas, and impacts their facilities, whether it be State and County owned, such as the Hollister Hills SVRA, or Metcalf Motorcycle Park in Santa Clara County.

Response:

Chapter 4, Cumulative Effects, describes the rationale for identifying the planning area to be evaluated in the cumulative impacts analysis. Although all reasonably foreseeable route designation plans known at the time the Draft RMP and EIS analyses were considered in that analysis, it is also acknowledged that the impacts of these route designation plans on OHV opportunities in California is unknown because they are likely to maintain existing OHV opportunities in most locations, even where some routes and trails are designated closed to address conflicts on public lands managed by the BLM, the US Forest Service, or the CA Department of Parks and Recreation's Off-Highway Motor Vehicle Recreation Division.

Given these uncertainties, the level of analysis for cumulative impacts for an environmental document is commensurate with the level of information available regarding the range of projects that are under consideration. Given that not all of the projects identified in the cumulative projects list have been evaluated to a level where the project specific impacts have been assessed and identified, the analyses in the DEIS and FEIS identify the potential environmental impacts of the cumulative projects commensurate with the level of detail available for those projects at the time the analyses were completed. The cumulative analysis in each topical section identifies the impacts of the BLM current management of the CCMA, the effects of the cumulative projects, and the potential contribution of the proposed action to cumulative impacts in addition to the impacts of the cumulative projects, consistent with the requirements of the NEPA.

II. AGENCY AND ORGANIZATION COMMENTS

The following sections contain:

- A list of the agencies and organization that submitted comments on the CCMA Draft RMP/EIS (Table X-1)
- The language of each of those comments, from the written comment letters/emails (Table X-2)
- A brief response to the comments and issues addressed in the CCMA Draft RMP/EIS, and/or a reference to the Common Response that addresses the issues raised in those comments (Table X-2)

Table X-1; Commenting Agency and Organization List

Comment Code	Agency/ Organization	Commenter
AG-EPA	United States Environmental Protection Agency	Kathleen M. Goforth
AG-USFWS	United States Fish & Wildlife Service Sacramento & Ventura Offices	Ken Sanchez, J.Miesanderwier
AG-USGS	United States Geological Survey	Brenda Johnson
AG-DTSC	Department of Toxic Substances Control	Steven Ross
AG-DPR-OHMVRD	Department of Parks and Recreation	Daphne C. Greene
AG-CALFIRE	Department of Forestry and Fire Protection	Robert E. Taylor
AG-DWR	Department of Water Resources	Teodoro Z. Alvarez
AG-OPR	California Governor's Office of Planning and Research, State Clearinghouse	Scott Morgan
AG-MBUAPCD	Monterey Bay Unified Air Pollution Control District	Jean Getchell
AG-SBC	County of San Benito	Reb Monaco, Board of Supervisors (Chairman)
AG-CAOHVC	California State Off-Highway Motor Vehicle Recreation Commission	Gary Willard (Chairman)
AG-CANAHC	California Native American Heritage Commission	Dave Singleton

Comment Code	Agency/ Organization	Commenter
AG- WRCD	Westside Resource Conservation District	Philip Erro
AG-SJVRCD	San Joaquin Valley Resource Conservation and Development Council	Philip Erro
ORG-AMA36	American Motorcycle Association, District 36	Nick Haris
ORG-ALAA	American Land Access Association	Marshall Havner
ORG-BAM	Bay Area Mineralogists	Bill Spence
ORG-BRC ,	BlueRibbon Coalition	Don Amador
inc. MSBT-LAW	Moore, Smith, Buxton, Turcke, Chartered	Paul A. Turcke
ORG-CA4WDC	California Association of Four Wheel Drive Clubs, Inc.	Amy Granat
ORG-CERA	California Enduro Riders Association	Bruce Brazil
ORG-CFMS	California Federation of Mineralogical Society	Comments submitted by individual societies and members.
ORG-CMDA	California Motor Dealers Association	John Paliwoda
ORG-CNPS	California Native Plant Society	Rosemary Foster
ORG-CORVA	California Off-Road Vehicle Association	Bruce Whitcher
ORG-CBD	Center for Biological Diversity	Ileene Anderson
ORG-CRS	Coalinga Rockhound Society	Comments submitted by individual members.
ORG-FOCCMA	Friends of Clear Creek Management Area	Mike Wubbels
ORG-FGMS	Fresno Gems and Mineral Society	Comments submitted by individual members.
ORG-GRMC	Ghost Riders Motorcycle Club	Comments submitted by individual members.
ORG-HVPO	Hernandez Valley Property Owners	Mark Henze, et. al.
ORG-LADBR	Los Altos Dirt Bike Riders	Comments submitted by individual members.

Comment Code	Agency/ Organization	Commenter
ORG-LGMC(1)	Lemoore Gems and Mineral Club	Karin Kissinger, Kathy Corbett
ORG-LGMC(2)	Los Gatos Motorcycle Club	Comments submitted by individual members.
ORG-RUTS	Racers Under The Son	Steven Craig
ORG-RRMC	Ridge Runners Motorcycle Club	Comments submitted by individual members.
ORG-SRMC	Salinas Ramblers Motorcycle Club	Matt Beck
ORG-SVRGC	Salinas Valley Rock and Gem Club	Gary V. Beck
ORG-SFGMS	San Francisco Gem and Mineral Society	Kevin Anderson
ORG-SCVGMS	Santa Clara Valley Gem and Mineral Society	Comments submitted by individual members.
ORG-SCGMS	Santa Cruz Gem and Mineral Society	Comments submitted by individual members.
ORG-SCC	SaveClearCreek.org	Curt McDowell
ORG-TMC	Timekeepers Motorcycle Club	Martin Markham, Terry Pederson, Ross Ross, James Strenfel, Alex Wagner-Juaregg, Michael Zesiger, (cc: John Davis)
ORG-3ROCKS	Three Rocks Research	Ray Iddings
ORG-TGMC	Tule Gems and Mineral Club	Comments submitted by individual members.
ORG-VWA	Ventana Wilderness Alliance	Tom Hopkins
ORG-WOHVA	Wisconsin Off-Highway Vehicle Association	John Schnorr

Table X-2; Agency and Organization Comment Summary and Response

AG-EPA: United States Environmental Protection Agency

Comment: Resource Impacts	**Recommendations:**
For several resources, the Draft EIS presents the environmental impacts of the Preferred Alternative and the other alternatives in relative terms. However, a more quantitative comparative analysis should be presented to more clearly describe the differences in magnitude and significance of the direct, indirect, and cumulative impacts between the alternatives. For example, the Draft EIS does not provide emissions estimates for criteria air pollutants under each alternative.	The Final EIS should provide the projected emissions of criteria air pollutants for each of the alternatives and discuss the predicted effectiveness of measures to mitigate these emissions under each of the alternatives. The Final EIS should describe the air quality monitoring and mitigation effectiveness monitoring that would be conducted under each of the alternatives.
The Draft EIS does not present the average sediment yield predictions for different areas (e.g., undisturbed soil, barren hillclimbs, and the road network) of the CCMA under each alternative. This information would be useful in characterizing how each alternative would affect soil resources, water quality, watershed conditions, and aquatic life in the CCMA. In addition, based on Dynamac (1998)1, five mine areas in the CCMA were determined to pose the greatest risk to water quality from metals contamination (Draft EIS, p. 206). It is unclear from the Draft EIS what actions BLM has conducted since the publication of that study to reduce surface water contamination in CCMA watersheds, and what the results are for water quality monitoring conducted since that time, including monitoring conducted since the closure of the CCMA in May, 2008.	

BLM Response: The Final EIS provides the projected emissions of criteria air pollutants for the proposed action and measures to mitigate these emissions. The proposed action also includes air quality monitoring and mitigation effectiveness monitoring that would be implemented to ensure public health standards are enforced and hazardous emissions from management activities are minimized.

The DEIS reference to the Dynamac (1998) report characterizes the risk to water quality from metals contamination. Remediation of the areas identified in the study has been implemented through the BLM's abandoned mine lands program, and is described in Section 3.2.3.3 (DEIS, pg. 144). Management actions to address potential impacts of other abandoned mine lands to resources are common to all alternatives.

A summary of results for water quality monitoring conducted since the temporary closure order or the Serpentien ACEC was issued in May, 2008 are included in Section 3.9.4 of this PRMP/FEIS..

Comment: Dust Suppression Measures	**Recommendations:**
The Draft EIS identifies several dust suppression and surface hardening measures that could be implemented "as needed" on major routes under all alternatives. While the costs of various measures are estimated and compared in Table 3.3-1, neither the feasibility nor the potential effectiveness of each of these measures is discussed in the Draft EIS. In addition, it is unclear what BLM's decision criteria would be for selecting a specific method, how likely implementation would be, and how many miles of routes and which routes would be treated. Information regarding the feasibility and effectiveness of mitigation measures is essential to analyzing the realistic environmental impacts of alternatives. If the proposed mitigation is significantly underfunded or infeasible for other reasons and, therefore, not implemented, the potential environmental impacts could be significantly different than what is predicted for each alternative. In addition, the cost of each measure should be compared against its effectiveness so that BLM can make an informed decision about whether the project, as proposed, is cost effective. For example, BLM's 1999 Record of Decision for the CCMA (p. 10) committed to dust suppression at staging areas and along approximately 30 miles of main transportation routes "as appropriate" to reduce dust generation and associated asbestos exposure. However, we understand that only a few miles of roads were ever dust suppressed with water a few times between 1999 and 2004 because water was not available and road watering was not found to be very effective (pers. comm. between George Hill, BLM, and Jeanne Geselbracht, EPA, 9/9/04). In light of the projected cost, BLM's past findings regarding feasibility and effectiveness, and EPA's health risk assessment findings under moist soil conditions, we do not believe road watering has been proved to be a feasible or effective measure for the CCMA.	The Final EIS should identify the goals of the dust suppression and surface hardening measures identified in Table 3.3-1, include an evaluation of the feasibility and effectiveness of these measures, identify the decision criteria BLM would consider in selecting such measures, and describe how likely implementation of each measure would be. The Final EIS should also describe the effectiveness monitoring that would be conducted under each alternative to determine how well dust suppression and surface hardening measures are working and discuss contingency measures that may be needed if monitoring indicates that initial measures are not as effective as predicted.

BLM Response: Section 4.2.2 of the DEIS discloses the limits and constraints of the analysis, including Sec. 4.2.2.4 "Estimates of Asbestos Emissions Reductions, Cost, Effectiveness, and Feasibility of Mitigation Measures". The feasibility and the potential effectiveness of dust suppression measures are further discussed in Section 4.3.2 (DEIS pg. 358). Appendix V, under MP-17 (DEIS pg. 643) BLM describes how mitigation measures would be implemented and identifies the need for effectiveness monitoring to determine how well dust suppression and surface hardening measures are working.

Comment: Typographical Errors	**Recommendations**
Page 334: First paragraph refers to Figure ES-I of EPA's Risk Assessment, but this figure does not appear in the Draft EIS. Page 353: The first line of section 4.2.7.1 should say ">18" rather than "≤ 8." Page 193: Paragraph 2 states, "The air basin is designated as non-attainment for the Federal PM1O and PM2.5 standards." Please note that, although the San Joaquin Valley Air Basin is in non-attainment for PM2. 5, it is in maintenance status for the PM10 standard. Page 449: Paragraph 1 reiterates this misstatement and should be rectified. Page 449: Paragraph 7 also states that San Benito and Fresno counties are in non-attainment for the PM1O National Ambient Air Quality Standards. This should be changed to indicate that San Benito County is in attainment for PM1O, and Fresno County is in maintenance status for PM1O.	-none-

BLM Response: Page 334: Inserted reference EPA to risk assessment.
Page 353: The first line of section 4.2.7.1 should say ">18" rather than "≤ 8."
Page 193: Paragraph 2 states, "The air basin is designated as non-attainment for the Federal PM1O and PM2.5 standards." Please note that, although the San Joaquin Valley Air Basin is in non-attainment for PM2. 5, it is in maintenance status for the PM10 standard.
Page 449: Paragraph 1 reiterates this misstatement and should be rectified.
Page 449: Paragraph 7 also states that San Benito and Fresno counties are in non-attainment for the PM1O National Ambient Air Quality Standards. This should be changed to indicate that San Benito County is in attainment for PM1O, and Fresno County is in maintenance status for PM1O.

Thank you.

AG-USFWS: United States Fish & Wildlife Service [Sacramento Field Office]

Comment: CCMA Watersheds	Recommendation
The Clear Creek upper-watershed provides runoff into numerous west and east-flowing streams, [including a tributary (San Carlos Creek)] to Silver Creek which eventually connects with Panoche Creek in western Fresno County. During heavy rainfall events, Panoche Creek can influence water quality in downstream waters including the Grasslands Marshes and the San Joaquin River. The State Water Resource Control Board (SWRCB) listed Panoche Creek (from Silver Creek to Belmont Avenue) as impaired for mercury, sedimentation and selenium in 2006 (SWRCB 2006). The sources of selenium in this waterway were listed as agriculture, livestock grazing, and highway/road/bridge construction (SWRCB 2006). In the 2006 303(d) list of impaired waterbodies for California, the SWRCB recommended that the affected size of Panoche Creek be expanded to include the length from its headwaters to Silver Creek, which increased the entire segment by 27 miles.	We encourage BLM to consider downstream water quality impacts associated with land management of the upper-watershed in the DRMPIEIS. Further, we ask that BLM consider implementation of a preferred RMP alternative that would provide the greatest benefit to downstream water quality. Such management actions could include reduced grazing prescriptions on upper watershed lands within the Clear Creek Management Area.

BLM Response: The DEIS references a report prepared by Dynamac in 1998 that characterizes the risk to water quality from metals contamination in the CCMA. Remediation of the areas identified in the study has been implemented through the BLM's abandoned mine lands program, and is described in Section 3.2.3.3 (DEIS, pg. 144). Management actions to address potential impacts of other abandoned mine lands to resources are common to all alternatives.

AG-USFWS: United States Fish & Wildlife Service [Ventura Field Office]

Comment: **San Benito Evening Primrose & Other Listed Species That May Occur In CCMA**	**Recommendation**
The San Benito evening-primrose is restricted to serpentine-derived alluvial terraces and deposits near San Benito Mountain, within and adjacent to the CCMA (Service 2009). Of the 63 known populations of San Benito evening-primrose, all but 5 occur within the boundaries of the CCMA (Bureau 2009). Identified threats to this species include, but are not limited to, off-highway vehicle (OHV) recreation, camping, soil loss and erosion, facilities construction and maintenance, mining activities, and habitat alteration due to invasive species; the most significant of these threats being OHV use. Implementation of the Bureau's 2006 Record of Decision, specifically, the closing of some routes and barrens, in addition to the temporary closure of the CCMA and ongoing monitoring and management of the San Benito evening primrose and its habitat, has helped to reduce threats to the species and maintain populations (Service 2009). If the land use management alternative implemented by the Bureau has the potential to adversely affect the San Benito evening-primrose, consultation pursuant to section 7 of the Act is required.	We recommend that biological surveys for the previously mentioned species that have the potential to occur in the CCMA be conducted if suitable habitat is present. We recommend that survey results and any related appendices be submitted to our office for review.

BLM Response: Biological surveys for the rare species that have the potential to occur in the CCMA has been conducted throughout the management history f the CCMA and would continue under the proposed plan, and survey results are submitted to the FWS for review on an annual basis.

Comment: Land Disposal and Acquisition	**Recommendation**
We recommend that biological surveys for listed species be conducted on lands proposed for disposal or acquisition, and on any lands that may be redesignated for recreational purposes. We recommend that the survey results and any related appendices be submitted to our office for review. In addition, if the intent of use of lands that are disposed of, or acquired by the Bureau, may have an impact on listed species or their habitats, consultation pursuant to section 7 of the Act is required.	-none-

BLM Response: Biological surveys for listed species would be conducted on lands proposed for disposal or acquisition, and BLM shall consult with FWS on any actions that may have an impact on listed species or their habitats.

Comment: California Condor	**Recommendation**
The CCMA is located well within the range of the California condor, and there is additional concern regarding lands that may be left unmanaged by the Bureau following the designation of a land use management plan. For instance, the "Tucker Mountain Zone" proposed for disposal in the northwestern CCMA is located within approximately 16 miles of the Pinnacles National Monument, a California condor release site. Hunting, development, and construction of communications towers and/or wind turbines, are a few examples of land use that could be cause for concern in the area. For this reason, we recommend that the utmost consideration is taken when determining the use and long term goals of the proposed disposal lands to ensure the California condor is not adversely affected.	-none-

BLM Response: The proposed action analyzed in the Proposed RMP and Final EIS has been modified to retain the public lands in the Tucker Zone in order to preserve wildlife habitat in cooperation with the California Department of Fish and Game and private property owners in the area.

Comment: Bald and Golden Eagle Protection Act	**Recommendation**
On November 10, 2009, the Service implemented new rules (74 FR 46835) governing the take of golden eagles (*Aquila chrysaetos*) and bald eagles (*Haliaeetus leucocephalus*). The new rules were released under the existing Bald and Golden Eagle Protection Act, which has been the primary regulation protecting unlisted eagle populations since 1940. All activities that may disturb or incidentally take an eagle or its nest as a result of an otherwise lawful activity must be permitted by the Service under this act.	-none-

BLM Response: Comment noted.

Comment: Communication Towers	**Recommendation**
The Draft CCMA RMP/EIS includes management actions that would serve to mitigate impacts to visual resources, including regulating communications towers to appropriate areas. Construction of communications towers (including radio, television, cellular, and microwave) in the United States has been growing at an exponential rate, increasing at an estimated 6 percent to 8 percent annually. The construction of new towers creates a potentially substantial adverse impact on migratory birds, especially some 350 species of night-migrating birds.	We recommend that the Bureau review the enclosed interim guidelines the Service has adopted concerning the siting, construction, operation, and decommissioning of communications towers. These guidelines were developed because the number of communications towers in the United States has increased dramatically and evidence suggests that these towers pose a hazard to migratory birds. Implementation of these guidelines is voluntary, and the recommendations must be balanced with Federal Aviation Administration requirements and local community concerns where necessary. (Enclosure: U.S. Fish and Wildlife Service Interim Guidelines For Recommendations On Communications Tower Siting, Construction, Operation, and Decommissioning)

BLM Response: BLM decision makers have reviewed the interim guidelines the Service has adopted concerning the siting, construction, operation, and decommissioning of communications towers; and the recommendations would be balanced with Federal Aviation Administration requirements and local community concerns where necessary.

AG-USGS: United States Geological Survey

Comment:	Recommendation
The U.S. Geological Survey has reviewed the Draft Clear Creek Management Area California. We do not have substantive comments at this time.	NA

BLM Response: Thank you.

AG-DTSC: Department of Toxic Substances Control

Comment: General	Recommendation
DTSC agrees that the alternatives have been thoroughly established and continues to recommend that any alternative that is selected be evaluated for potential human health risk due to asbestos exposure and to implement mitigation measures as appropriate. As a recreational user of a proposed new area may encroach on the Atlas Asbestos Mine Operable Unit of the Superfund Site, the site should be secured as necessary from potential trespass.	1. Recommend all possible precautions be used to minimize potential exposure to asbestos. 2. Map 5 contains boundaries for serpentine and non-serpentine formation. Recommend the existing and proposed new recreational facilities identified in Alternative F outside the ACEC be verified with USGS maps as clearly outside the overlying serpentine formation. If found, recommend assessing the existing and proposed routes for the occurrence of asbestos and use of activity based monitoring and assessment of potential risk as deemed necessary. Appropriate mitigation measures should be considered for minimizing asbestos exposures to all proposed uses. Consider similar scenarios to those assessed by USEPA for the ACEC to determine potential risk to adults and children using OHVs in these areas. Develop an activity based scenario for any new uses as well (e.g equestrian). 3. Recommend the road proposed for the scenic route through the ACEC be resurfaced to reduce asbestos emissions. 4. Consider reducing speed limits of 15-25 miles per hour on the scenic route to no more than 10 unless resurfacing to mitigate asbestos emissions is completed. 5. For potential asbestos areas, consider establishment of public use vehicle washing and HEPA vacuuming stations at the entrance(s) with standard operating procedures so that vehicles can be cleaned upon leaving.

From review of the document, the grouping of the management actions and BLM's preferred alternative are well defined in section 2. From our review of the RMP/EIS, the following comments [i.e. recommendations] are provided:	6. Consider not allowing livestock grazing on the ACEC BLM managed lands in order to minimize dust generation and release of asbestos. 7. To the extent feasible, recommend adding precautions to protect fire fighters using Best management Practices from asbestos exposure during wildland fires and controlled burns within the ACEC. 8. Recommend for Best Management Practices (Appendix V) a) trigger for initiating each measure, b) conditions in which the management practices will \ be used, and c) measuring techniques and criteria for measuring effectiveness

BLM Response: Under the proposed action, BLM would prepare separate Travel Management Plans to designate routes outside the ACEC for vehicle use and identify appropriate mitigation measures to alleviate the effects to public land resources using the screening criteria and route designation methodology described in Appendix II.

Map 5 only depicts soils derived from serpentine parent materials. All recreational facilities outside the ACEC, including routes and trails to be considered in these Travel Management Plans, would incorporate the recommended information from USGS maps to minimize surface disturbance associated with management activities and visitor use within the serpentine formation and serpentine derived soils known to have high concentration of asbestos fibers.

AG-DPR-OHMVRD: Department of Parks and Recreation

Comment: Scope of the Draft RMPIEIS	**Recommendation**
The Division is concerned by the basic scope of the Draft RMP/EIS. As stated in its Introduction, the Draft RMP/EIS is a "stand alone" document designed exclusively to guide the management of the Clear Creek Management Area (CCMA). Alternatively, the Hollister Field Office Resource Management Plan (Hollister RMP) (2007) provides for management by BLM's Hollister Field Office of the remaining areas beyond the bounds of CCMA. Thus, the BLM presents a mutually exclusive situation in which management actions proposed in the Draft RMPIEIS are limited solely to the CCMA, independent of the surrounding area. Accordingly, the Division is concerned all relevant alternatives and other impacts are not thoroughly addressed within the Draft RMP/EIS. In particular, the Draft RMP/EIS offers no consideration to viable options or substitutes for the CCMA	The Division believes it essential for the BLM to examine every possibility before this important OHV recreation area is permanently lost

recreational opportunities. Instead, the establishment of new OHV recreation areas outside the CCMA is relegated to the Section 1.3.3 — "Issues Considered but Not Further Analyzed" (page 8). The subsequent suggestion in the Draft RMP/EIS (page 9) that the Hollister Field Office and OHMVR Division work together at a later date to find additional OHV recreation areas elsewhere in the Hollister Field Office, while a welcome proposal, is seemingly counter to the scope of the document and not a satisfactory solution. In fact, the Hollister RMP offers no OHV recreational opportunity on par with the CCMA. Indeed, few areas in the country offer an OHV experience like that provided at CCMA.	

BLM Response: The Hollister RMP (2007) provides for management by BLM's Hollister Field Office and considers viable options for motorized recreational opportunities in the remaining areas beyond the bounds of CCMA. The CCMA Draft RMP/EIS also includes a range of alternatives that considers viable options for motorized recreation opportunities both inside and outside the Serpentine ACEC based on the purpose and need described in Chapter 1.

Comment: Purpose and Need	**Recommendation**
The BLM asserts the need for the CCMA RMP/EIS arises from numerous changes in circumstances since the current land use plan decisions were adopted. As evidence, the BLM suggests the existing RMP and subsequent amendments do not address current public health and safety and resources protection issues in CCMA. However, the list of factors that illustrate the "Purpose and Need" for the RMP appear disingenuous: First, the BLM claims the May 2008 CCMA Asbestos Exposure and Human Health Risk Assessment (Health Risk Assessment) prepared by the United States Environmental Protection Agency (EPA) "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." Second, the BLM asserts 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." Lastly, the BLM suggests "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." Of the three items listed above, the first (asbestos) is clearly the driving force of the entire document. However, the	-none-

significance and accuracy of the information presented in the Health Risk Assessment is subject to debate. The second item is irrelevant to the Draft RMP/EIS. The California condor does not exist within the CCMA and is only found to be "potentially present within the CCMA" (pg. 174). The red-legged frog is present fifteen miles or more downstream from the CCMA and has never been recorded in or near the CCMA (pg. 174). Further, the tiger salamander has "never been recorded in the environs of CCMA" (pg. 174). The third item, changes in socio-economic conditions, is poorly supported. The purported increase in demand and social awareness are not demonstrated in the discussion of the affected environment.	

BLM Response: Refer to Common Response Section 2: Purpose and Need.

Comment:	**Recommendation**
The BLM actions are prompted predominantly by the EPA's Health Risk Assessment. The BLM believes the Health Risk Assessment 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." However, the EPA report included substantial caveats regarding the accuracy and assumptions used to develop the report. The following items appear in the "Limitations of the Assessment": - "... there are assumptions and variables that can cause the calculations to either overestimate or underestimate the actual risk." - "The CCMA assessment may overestimate or underestimate risk if EPA's measurements of exposure and the assumptions of exposure frequency are either greater or less than actual conditions." - "Additional uncertainty is introduced because both the IRIS and the OEHHA toxicity values for asbestos are based on epidemiological studies of work place exposures to intermittent high asbestos concentrations over extended periods. While the concentrations measured for activities at CCMA are significantly elevated, the exposure is infrequent and episodic." - "Because there is no clear mode of action for asbestos-induced disease and no threshold for cancer health effects, using a direct time-weighted extrapolation from the longer, chronic occupational exposures to shorter-term, episodic exposures may underestimate or overestimate the risk." - "The risks could be much lower because the exposures may be too infrequent or the total retained fiber burden too few to initiate the asbestos disease process." Given the uncertain conclusions of the document, it seems inappropriate for BLM to rely on the document to guide	-none-

substantial and controversial land management actions. Decisions based on such variable and imprecise studies should be cautiously and conservatively implemented, if at all. Instead, the preferred alternative reduces the acreage available within the Area of Critical Environmental Concern (ACEC) for OHV recreation to 1.5% of the area, defined as a "Scenic Route," and restricts use in the ACEC to single vehicle class during the day. Such a dramatic reduction of opportunity should only be recommended if the supporting documentation is considerably more definitive. The Division believes serious questions have been raised about the Health Risk Assessment, such as identification and differentiation of chrysotile and amphibole asbestos, asbestos-related epidemiology, appropriateness of risk models, and activity based sampling methods. The Division contends further research and characterization of the potential hazard at the CCMA is warranted. Since the preferred alternative effectively closes the CCMA to OHV recreation, the Division finds it imperative the hazard risk be independently verified before a final decision is made.	

BLM Response:

During the public comment period on the Draft CCMA RMP/EIS, the California State Park Off-Highway Motor Vehicle Recreation Division (OHMVRD) requested that BLM wait until an independent asbestos exposure study in the CCMA could be prepared before issuing the CCMA Proposed RMP and Final EIS.

The BLM agreed to the OHMVRD's request, and on March 22, 2011 the OHMVRD released the report, titled "Preliminary Analysis of the Asbestos Exposures Associated with Motorcycle Riding and Hiking in the Clear Creek Management Area (CCMA) San Benito County, California." The report was completed by scientists from the International Environmental Research Foundation (IERF), and is linked on the OHMVRD's website: http://ohv.parks.ca.gov/pages/1140/files/ierf_ccma_final_3_8_11-web.pdf

The purpose of the OHMVRD commissioned report was to determine if management and operational strategies could be employed at the CCMA to mitigate risk while still allowing access for off-highway vehicle recreation. However, BLM has determined the IERF report does not offer any new technical or scientific information that alters analysis of human health risks and impacts to the environment associated with exposure to airborne asbestos emissions from the range of alternatives described in this PRMP/FEIS.

Both the EPA and the California Department of Toxic Substances Control's (DTSC) Human and Ecological Risk Office (HERO) prepared comment letters that identified significant concerns about the IERF report. These comment letters are also linked on the OHMVRD website:

http://www.parks.ca.gov/pages/1140/files/ccmaepacommentsierfreport12may11.pdf

http://www.parks.ca.gov/pages/1140/files/dtsc-analysis-ierf-report.pdf

IERF's rebuttal to the comments from EPA and DTSC are also linked on the OHMVRD website:

http://www.parks.ca.gov/pages/1140/files/ierf-epa-rebuttal-ccma.pdf

http://www.parks.ca.gov/pages/1140/files/ierf-dtsc-hero-rebuttal-ccma.pdf

Upon evaluation of the IERF and EPA studies as well as comments received on the CCMA Draft RMP/EIS, BLM determined that adaptive management criteria would be needed to allow for adjustments to land use in light of new information regarding asbestos exposures. The variability of meteorological conditions and soil moisture in the Serpentine ACEC indicate that greater attention to detail and more information will be helpful to manage all forms of use in the area. The IERF and EPA studies conclude there is a need for more detailed management and a need to consider forms of mitigation to offset exposures to the public while using the area. Through adaptive management BLM is committed to evaluating all new and credible information on strategies for continued public use in the area.

BLM acknowledges that controversy exists regarding the human health risks associated with exposure to naturally occurring asbestos. The EPA risk assessment and the IERF report both highlighted the need for further research to determine effective strategies to reduce risk to CCMA visitors. Therefore, the preferred alternative identifies "adaptive management criteria" that would allow the BLM to make changes to designated route systems and addresses how routes may be modified within the transportation network in the future. The adaptive management criteria were developed in response to the issues and concerns identified in the IERF study and public comments on the CCMA Draft RMP/EIS (2009). If one of these criteria are met, then BLM would reassess CCMA RMP land use decisions associated with human health risks from exposure to airborne asbestos fibers, and potentially apply adaptive management should significant new information become available that warrants modifications to the limits on annual visitor days or the total miles of routes available for motorized use in the ACEC. At a minimum, the BLM will re-examine the body of peer-reviewed data available on this subject within three years following issuance of a record of decision for the CCMA RMP.

It should be noted that routes designated "open" for motorized use under the range of alternatives analyzed in this PRMP/FEIS satisfy the 43 CFR 8342.1 "minimization criteria" for protection of public land resources. Whereas, the miles of designated routes and restrictions on vehicle types in the ACEC are based on the "limited" area designation, and the need to reduce asbestos emissions from BLM management activities and minimize human health risks associated with exposure to airborne asbestos in the CCMA.

Comment: Waiver of Liability and Indemnification of Risk	**Recommendation**
A waiver of liability has been consistently proposed as an option to allow continued recreational use of the CCMA.	-none-

However, BLM dismisses the concept of a waiver for recreational users of CCMA in the discussion of Section 4.2.6.2 Mitigation (page 352). In the BLM's view, "developing a waiver of liability, or establishing indemnification of risk, would have no beneficial impacts on public health and safety because neither approach would actually reduce exposure to airborne asbestos or improve overall protection of human health and the environment." The Division disagrees with this assertion and contends a waiver should be considered as a practical option to mitigate the concerns of the BLM. The prospect of a waiver of liability should give a reasonable individual cause to consider participating in an activity at that location. On an individual basis, potential exposure to airborne asbestos may be reduced or avoided should a person opt not to enter the CCMA due to the waiver and potential hazards identified therein. The waiver discussion in the Draft RMP/EIS continues, ". . . the potential for waivers of liability or indemnification of risk as 'stand-alone' mitigation measures for human health and safety do not satisfy the purpose and need for the CCMA RMP/EIS." This statement is contrary is to the stated purpose of the Draft RMP/EIS, which is to "establish goals, objectives, and management actions for BLM-administered lands in CCMA that address current issues, knowledge, and conditions." Requiring a waiver is undeniably a management action within the purview of BLM, and there is no obligation that it be implemented on a "stand alone" basis. Furthermore, BLM finds the waiver of liability to be an acceptable tool when used in conjunction with other management circumstances in the Draft RMP/EIS, including the preferred alternative. For example, requiring ". . . signed waivers of liability to indemnify BLM against risk of tort claims associated with CCMA visitor use and exposure to airborne asbestos fibers" is presented in the Management Actions Common to Alternatives B through G (page 41). A similar statement also appears in the presentation of the preferred alternative (page 86) and in the discussion of mitigation measures (page 351). The Draft RMP/EIS further states, the action of providing waivers of liability or indemnification of risk as "stand-alone" mitigation measures, "would likely have major long-term adverse impacts on human health and the environment due to the perception that exposure to airborne asbestos fibers above the acceptable risk range established under the EPA Superfund Act is permissible and authorized by the Federal government." This statement is entirely speculative in nature. The statement also contradicts Table 2.6-2, which presents a comparison of impacts to public health and safety and hazardous materials (page 100). Discussing HAZMAT Mitigation Measures, this table identifies 'moderate (emphasis added) adverse effects from signed waivers of liability..." The justification for the different level of impact is unknown. Moreover, it is counterintuitive that a waiver disclosing potential risks would serve to lessen the public's perception of the risk.	

BLM Response: Refer to Common Response Section 3: Range of Alternatives.

Comment: Alternative OHV Recreational Management Strategies Not Considered	**Recommendation**
The EPA's Health Risk Assessment of CCMA demonstrated that risk regarding exposure to naturally occurring asbestos is present when different recreational activities are conducted at CCMA, including OHV recreation. The Health Risk Assessment did not evaluate how the risk might be lowered if mitigative management measures were implemented. Consequently, mitigative OHV management measures - short of eliminating OHV recreation at CCMA - were not truly given consideration from a risk analysis perspective. The Division believes there are many management strategies that could be implemented that could reduce asbestos exposure risk, such as seasonal operation of CCMA, trail re-routing and reducing trail widths, and limiting single-track trail use to motorcycles only. These and similar strategies should be evaluated from a health-based risk assessment perspective to determine if risk from potential asbestos exposure is reduced to a degree that is acceptable by BLM.	The Division is troubled by the ramifications of this proposed RMP/EIS and its adverse impacts to OHV recreation. As always, the Division is prepared to work closely with the BLM in developing alternatives which will lead to reopening the CCMA to continued OHV recreation.

BLM Response: Refer to Common Response Section 3: Range of Alternatives.

AG-CALFIRE: Department of Forestry and Fire Protection

Comment:	**Recommendation**
After reviewing the Draft Environmental Impact Statement for the Clear Creek Management Area, I have no significant concerns. CAL FIRE and the Bureau of Land Management have long enjoyed an excellent, cooperative working relationship on fire management issues in the Clear Creek area and I would expect that to continue in the future.	-none-

BLM Response: Thank you.

AG-DWR: Department of Water Resources

Comment: Impacts from Increased Recreation Activities	**Recommendation**
(BLM) is proposing to increase the recreational activities of the Clear Creek Management Area (CCMA) which was closed to the public in May 2008" and that "as a State Agency with lands and facilities that may be affected by the change in land use in the CCMA, we have reviewed this plan from a flood and sediment management perspective.	-none-

BLM Response: All the alternatives in the Draft CCMA RMP/EIS (except for the No Action Alternative) would actually reduce the amount of recreation activities in the CCMA. Refer to Common Response Section 3A and 3B.

Comment: Impacts to California Aqueduct	**Recommendation**
The CCMA is located in San Benito and Fresno Counties in Central California. It includes part of the New Idria Formation, a serpentinite rock body that contains the largest asbestos deposit in the country. This area is part of the Arroyo Pasajero watershed which ultimately drains into the ponding basin along the California Aqueduct. DWR and Reclamation owns, operates, and maintains the ponding basin as part of the California Aqueduct which serves 25 million people in Southern California and hundreds of thousands of acres of farmland in the San Joaquin Valley. DWR cannot support any increased recreational activity in the CCMA because it will likely increase sedimentation into the Arroyo Pasajero Ponding Basin including sediments containing naturally occurring asbestos fibers sourced from the New Idria Serpentinite outcrop within the CCMA and therefore could potentially affect our operations and maintenance activities in the basin. These activities include maintenance of a channel in the Arroyo Pasajero to guide its flows into the ponding basin to reduce flooding along Lassen Avenue and the town of Huron. The watershed is drained by several streams that drain into Los Gatos Creek, which in turn drains into the Arroyo Pasajero ponding basin managed by DWR. Historical flood events have brought a significant amount of floodwaters and asbestos-laden sediments into the ponding basin at the California Aqueduct. Many of these flood events cause significant damage to roads and surrounding farmlands and can be a threat to the aqueduct. DWR is concerned that any increased activity in the CCMA would increase sediment loads and naturally occurring asbestos concentrations in floodwaters, potentially reducing the ability to effectively operate the ponding basin during flood events and send floodwaters into the aqueduct. We are further concerned that these increased sediment loads would reduce the storage capacity of the basin and reduce the flood protection that the basin provides to surrounding farmlands and State and federal water users who depend on the high quality deliveries from the California Aqueduct. In 2005, DWR and Reclamation spent over $16 million to restore storage in the basin. Increased sediment deposition in the basin will require DWR to conduct this work more often at a further cost to water users. DWR is also concerned that any increased activity within the CCMA could potentially further restrict maintenance activities of DWR and Reclamation in managing the ponding basin at the California Aqueduct. In coordination with EPA due to the Superfund sites that formerly existed on the Los Gatos Creek drainage of the New Idria Serpentinite outcrop, DWR and Reclamation have significantly restricted the activities in the ponding basin to ensure that the basin is managed to reduce airborne asbestos and the inflow of floodwaters into the California Aqueduct that may	The RMP/EIS does not describe the impact of increased activities in the CCMA on the operation and maintenance activities in the ponding basin at the California Aqueduct. Asbestos is a known carcinogen according to the U.S. Environmental Protection Agency (EPA), and the CCMA is part of the Atlas Asbestos Mine Superfund Site. It should be noted that an overwhelmingly vast majority of the asbestos fibers contained in sediments from this area are from naturally occurring outcrops and not the superfund sites; these superfund sites encompass approximately 1,300 acres or about 4 percent of the total exposed asbestos-bearing

contain asbestos. EPA continues to make certain that DWR's and Reclamation's maintenance activities in the ponding basin reasonably reduce the amount of airborne and waterborne asbestos. Several studies have documented the flood-sediment-asbestos problems within the Arroyo Pasajero watershed and ponding basin. These studies show that prudent watershed management is necessary to reduce the magnitude of floods and transported sediments and asbestos from flood runoff. The Coordinated Resource and Management Planning (CRMP) groups formed inthe watershed have worked hard to inform landowners that responsible watershed management is necessary to reduce floods and preserve the water quality in the watershed. DWR, Reclamation, and BLM have all participated in the CRMPs and we should also ensure that our activities are also protecting the valuable resources in the area.	serpentinite body. The RMP/EIS does not describe the impact of increased activities in the CCMA on floodwater runoff, sediment transport, and suspended asbestos fibers in the creeks that drain the CCMA.

BLM Response: Section 4.9 of the CCMA Draft RMP and EIS and the Prospoed RMP and FEIS describe the potential impacts from seven management alternatives and various land use allocations on the water quality and quantity in creeks that drain the CCMA.

AG-OPR: California Governor's Office of Planning and Research, State Clearinghouse

Comment: CCMA Draft RMP/EIS SCH#: 2004074007	**Recommendation**
The State Clearinghouse submitted the above named Draft EIS to selected state agencies for review. The review period closed on March 8, 2010 and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.	-none-

BLM Response: Thank you.

AG-MBUAPCD: Monterey Bay Unified Air Pollution Control District

Comment: Health Risk to Exposure to Naturally Occurring Asbestos in the CCMA (Page 1) and Enforcement of Health Risk Standard	**Recommendation**
Given the recommended health-based limitation of no more than one visit per year, please explain how the BLM would enforce such a policy. Would an individual be issued a CCMA Passport that would be checked each time he/she visited the CCMA?	-none-

BLM Response: The Proposed Plan would limit the type and duration of public use that can occur in the ACEC, and would enhance opportunities for public use in the surrounding management zones within the CCMA. Roads entering the ACEC would be gated to provide for controlled access. An access permit system would be implemented to address frequency and duration of public use.

Comment: State Regulatory Requirements	**Recommendation**
As specified in the environmental document, asbestos can be released from serpentine and ultramafic rocks when the rock is broken or crushed. "At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards." (Technical Advisory, CEQA and Asbestos: Addressing Naturally Occurring Asbestos in CEQA Documents. State of California, Governor's Office of Planning and Research, July 2008.) Serpentine and asbestos-bearing ultramafic rock materials used for surfacing applications subjected to vehicular, pedestrian, or non-pedestrian use, such as cycling and horse-back riding, may not contain more than 5% asbestos under the Asbestos Airborne Toxic Control Measure (ATCM) for surface applications adopted by the California Air Resource Board (CARB) in 1990. In July 2000, CARB amended the ATCM to lower the allowable asbestos content to less than 0.25% for surfacing applications. In addition, the amended rule prohibits the use of surfacing material from ultramafic rock units identified on specific geological maps developed by the California Department of Conservation unless testing of the material demonstrates that it is below the 0.25%. Exemptions for exemptions can be filed with local air pollution control districts. In July 2001, CARB approved the ATCM for Construction, Grading, Quarrying and Surface Mining Operations to minimize naturally occurring asbestos (NOA) through application of best management practices for fugitive dust. Prior to commencement of project activities, this ATCM requires notification to the local air pollution control district, which would require the Bureau of Land Management to contact the Monterey Bay Unified Air Pollution Control District (MBUAPCD).	The MBUAPCD would like to work with the BLM to ensure that human health risk associated with activities within the CCMA is reduced to an acceptable level and that those activities do not result in the release of airborne asbestos that could affect the general public. This would include an evaluation of the health risk posed by any of the Alternatives except Alternative G, which would make permanent, the current temporary closure order "designating the entire Serpentine ACEC as "Closed" to vehicle use, and prohibit all forms of public entry into the 30,000-acre area of serpentine high in asbestos fibers." (Page 31)

BLM Response: Per the ATCM requirements, the BLM would contact the Monterey Bay Unified Air Pollution Control District (MBUAPCD) to provide notification to the local air pollution control district prior to commencement of project activities to implement the proposed land use plan.

Comment: Section 4.7, Air Quality. Page 444.	**Recommendation**
"The goal for air quality management is to ensure that BLM authorizations and management activities comply with local, State and Federal air quality regulations, requirements, State Implementation Plans, and Regional Air Board standards and goals." As specified in Section 3.7, Air Quality (pages 190 et seq.); the North Central Coast Air Basin (NCCAB) is currently designated as attaining all federal air quality standards. It is designated non-attainment for the state ozone and P1M0 standards. However, the recent EPA proposal to lower the ozone standard to 0.060-0.070 parts per million would result in the NCCAB being designated non-attainment for the federal standard.	-none-

BLM Response: Comment noted.

Comment: Section 4.7.3.3, Mitigation. Page 446.	**Recommendation**
Mitigation of the impacts associated with various project alternatives is described in terms of compliance with various federal, state and local regulations, but does not provide sufficient detail to allow a meaningful analysis.	-none-

BLM Response: Comment noted.

Comment: Section 4.7.7.3, Climate Change. Page 451.	**Recommendation**
Despite references in the document to the growing population of California and increasing demand for recreational resources, as well as the travel (vehicle miles traveled) induced by the recreational opportunities currently offered and planned for the CCMA, the document provides no plan or strategy to address California's Global Warming Solution Act of 2006 (AB 32) requirement to reduce greenhouse gases to 1990 levels by 2020.	-none-

BLM Response: Comment noted. The DEIS (pg. 451) and CCMA Proposed RMP and FEIS (Section 4.7.1.2.2) state the following wuth regards to climate change. "This analysis assumes that global climate change will make the planning area warmer and drier by the end of the 21st century. However, the body of information and predictive models for climate change is in its infancy regarding prediction of site specific impacts to areas such as the CCMA, and the plan assumes that knowledge will advance quickly with the current emphasis on climate research and model development. As the RMP is implemented, BLM managers would place a continued emphasis on research, and studies may include components to assess the impacts of changing climate. In the event that climate change made achievement of RMP objectives themselves infeasible, the plan would need to be amended accordingly."

Comment: Impacts of Proposed Resource Management Plan and Potential Non-Attainment Designation of the NCCAB and General Conformity	**Recommendation**
As specified on page two of this comment letter, EPA's recent proposal to further lower the federal ozone standard to 0.060 - 0.070 parts per million would increase the efforts already needed to bring air quality in the NCCAB into compliance with both federal and State ozone standards. The BLM's Resource Management Plan for the CCMA is a project subject to the National Environmental Policy Act with its potential to degrade air quality and obstruct implementation of federal and State air quality standards. When the NCCAB is designated non-attainment for the federal ozone standard, all federal actions would become subject to the Clean Air Act's General Conformity Rule. One effect of being designated non-attainment for a federal air quality standard is becoming subject to federal conformity requirements, which include transportation conformity and general conformity. Established under the Clean Air Act (Section 176 (c), the General Conformity Rule requires that "...no department, agency or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to an applicable implementation plan." (42USC7506(c))	As previously stated, the MBUAPCD would like to work with the Bureau of Land Management to ensure that all air quality impacts are minimized to the lowest possible level.

BLM Response: The CCMA Draft RMP and EIS (pg. 191) and the Proposed RMP and FEIS (Section 3.7.3 provide the following information regarding conformity with state implementation plans. "The BLM's National Science and Technology Center prepared an Air Conformity Analysis and updated PM emission inventory for the CCMA based on soil type, silt loading, and vehicle type to analyze the impacts to air quality from the Proposed CCMA RMP Amendment and Final EIS for Route Designation (2005). This data quantifies the PM_{10} and $PM_{2.5}$ contribution from vehicles under current management (i.e. No Action Alternative) and is located in Appendix IX. The results of the 2005 Air Conformity Analysis determined that emissions associated with BLM's land use decisions and public vehicle use in the CCMA are below *de minimis* levels."

Section 4.7 of the CCMA Draft RMP and EIS and the Prospoed RMP and FEIS describe the potential effects of the seven management alternatives considered for CCMA, and all the alternatives in the Draft CCMA RMP/EIS (except for the No Action Alternative) would actually reduce the amount of emmissions from the recreation activities in the CCMA analyzed in 2005.

AG-SBC: County of San Benito

Comment: Potential Effects for San Benito County	**Recommendation**
Air Quality: • Prescribed fires are mentioned as a vegetation management measure in all alternatives, but the specific procedures to be used could be further detailed.	-none-

BLM Response: Section 2.4.17 of the CCMA Draft RMP and EIS and Section 2.5.17 of the Prospoed RMP and FEIS describe BLM's proposed wildland fire strategies and targets for prescribed fire and mechanical treatments in CCMA fire management units. Resource condition objectives and management action specific to prescribed fire are identified under the Proposed Action for fire management (Section 2.5.17). The Hollister Fire Management Plan (FMP) identifies high priority wildfire risk areas (e.g., wildland-urban interface, critical habitats and cultural areas) and the communities at risk within each FMU. (These lists may change as communities are removed or added each year). BLM would work collaboratively with appropriate Federal and State agencies, the San Benito Fire Safe Council, and other local partners to develop cross boundary fire management strategies, plans for risk reduction. and implement prescribed fire and fuels management projects across agency boundaries where this interaction would improve the overall success of the project. Management actions for prescribed fire and mechanical treatment activities on BLM-administered lands in the CCMA under the Proposed Action are summarized in Tables 2.5-6, 2.5-7 and 2.5-8.

Comment: Potential Effects for San Benito County	**Recommendation**
Transportation: #1. The document focuses on closure of public right of ways to mitigate asbestos issues. The County is concerned with reverse condemnation issues and the potential devaluation of privately-owned property. There is no discussion of proposed alternative routes or analysis of condemnation to mitigate the devaluation issue. #2. Many of the alternatives within the EIS show the closure of Clear Creek Road. The document does not address new or increased use of New Idria Road that could result from this closure. New Idria Road is currently not maintained, and is posted as such. There is no analysis of the level of effort required to bring that road to a usable condition or the potential associated health risks associated with traversing the old New Idria mine property. There do not seem to be any data, such as a traffic study, that would indicate what impacts existing residents on New Idria Road would experience. #3. In addition to New Idria Road, the document should also address impacts to other roads in San Benito County that will see an increase in traffic due to the Clear Creek closure. Special attention should be paid to Cienega Road, as it is the access road for the Hollister Hills State Vehicular Recreation Area. #4. There are statements that indicate that roads should be closed to lessen the impacts on storm runoff and vegetation. The construction of new routes identifies the impacts as minimal. This is a discrepancy that needs to be addressed. Where are the new routes and why are those impacts minimal? #5. There is discussion of acquiring land as it becomes available to mitigate health risks, yet no discussion of condemnation or eminent domain of private or public (County-owned) land. This item needs to be addressed. #6. There are provisions for limiting access based upon rainfall totals. When the seasonal rainfall total reaches eight inches, a series of measures designed to control and maintain runoff go into effect. This proposed policy is flawed. A severe storm could bring substantial rainfall early in the year and the control measures would be unavailable. Conversely, if rainfall is	-none-

spaced throughout the season and eight inches are achieved in March, there may be no reason to enact these measures. An alternate strategy would be to base mitigation measures on individual storms or a much smaller 'rolling' window of time (e.g., measures could kick in when two inches of rainfall are exceeded in two weeks). #7. Alternatives B and C propose to extend the dry season use restriction period for roads from April 15 to December 1 and to enforce wet season closures when eight inches of precipitation has been reached (additional rainfall exceeding half an inch with a 24-hour period or one inch within a 72-hour period would result in a three-day closure). The reasons for wet season closure could be expanded. #8. Page 87 mentions designating the Cantua, Condon, and Tucker Mountain Zones as "limited" vehicle use areas under Alternative E, with only full-sized vehicles and ATV/UTVs allowed on designated routes. The map for Alternative E does not show any designated routes for the Tucker Zone. A "potential public route" is shown in the Cantua Zone, but it is not clear from the map legend what type(s) of vehicles will be allowed to use this route.	

BLM Response:
#1. Refer to Common Response Section 3A. Section 2.4.3 of the CCMA Draft RMP and EIS and the Prospoed RMP and FEIS describe BLM's proposed routes under each alternative. Analysis of private property condemnation and devaluation is outside the scope of the CCMA RMP/EIS.

#2 & #3. The Draft RMP and EIS and the Proposed RMP and Final EIS both address the impacts of transportation and travel management actions from the range of alternatives and the BLM's "preferred alternative" in Chapter 4, Seciton 4.3. Alternatives E, F, and G include proposals to decommission or vacate Clear Creek Road. The analysis of impacts to other roads in the Planning Area that could result from these alternatives is described in Secitons 4.3.8, 4.3.9, and 4.3.10, respectively.

BLM's Proposed Action (Section 2.5.3) would allow for continued public access on Clear Creek Road (R1) for most popular uses, except OHV recreation, due to the human health risk identified in Chapter 4 and the EPA Asbestos Exposure and Human Health Risk Assessment (2008). Section 4.3.11 says the impacts to the transportation network in the Planning Area would be minor because the designated route network would maintain access for highway-licensed vehicles on all the existing major roads that provide public access to BLM-administered land in CCMA.
#4. Refer to Section, 4.8.10.2 (Soil Disturbance by Travel and Transportation Management).

During the mid-90's, BLM funded research and field studies on the roads and trails network in the CCMA for two major watershed and geomorphic studies to evaluate road related erosion and sediment problems for over 100 miles of roads and trails in the CCMA and to determine which barrens are at most risk due to accelerated erosion which delivers increased sediment to surface water.

The 1998 Pacific Watershed Associates (PWA) report identified the portion of the CCMA route network having erosion and sediment problems and also recommended specific engineered treatments at selected problem locations. This report further characterized that 40% of the accelerated

erosion was related due to poor road design and lack of maintenance and recommended that 9 miles of major roads be re-shaped to reduce sediment from entering into Clear Creek and other surface water.

Under the Proposed Action, reclamation or restoration of closed roads in the Serpentine ACEC on routes with stream crossings, or other areas with high potential for sedimentation of waterways would have the potential to create moderate to major long-term beneficial impacts to water resources through decreased soil erosion, vehicle-related contaminant introduction to water bodies, and enhanced watershed functions.

As described in Section 4.3.2, closure of redundant routes can result in beneficial impacts on water and biological resources and visual quality; however, the potential added burden on the remaining open routes may result in negative impacts such as soil erosion or compaction, loss of vegetative cover, or traffic congestion on the remaining route network. The development and construction of new routes and the abandonment and restoration of existing routes would also have minor negative, indirect impacts on private property owners and other existing rights-holders that would be required to obtain rights-of-ways to travel across BLM public lands on authorized on specific routes. Similarly, changes in the level and types of traffic on roads accessing CCMA could result in minor negative, indirect impacts on local and State governments that manage the road system if additional maintenance or patrol becomes necessary.

#5. Eminent domain is not an issue or concern that was identified during scoping. BLM considers eminent domain to be beyond the scope of the CCMA RMP because it is not reasonably foreseeable. Under the range of alternatives and the Proposed Action, BLM would cooperate with valid exisitng rights holders, including private property owners, to provide access to non-federal lands in the CCMA and consider land tenure adjustments from willing sellers.

#6 & #7. During periods of extreme wet weather, sustained vehicle use may compromise the integrity of the road surface and public land resources as a result of rutting of roads and trails and sediment transfer. Under current management (No Action Alternative) BLM restricts vehicle access after the seasonal rainfall total reaches eight inches and 1 - 2” of rain falls within a 24-72 hour period. This is an implementation-level decision that is based on the need to ensure public safety and reduce impacts to roads and resources during extreme weather conditions.

Dry season use restrictions were also considered among the range of alternatives to mitigate human health risks. However, EPA determined that wet weather reduces but does not eliminate exposure, and there are still unacceptable risks associated with vehicle use during the “OHV use period” that would be authorized under Alternative B and C.

Therefore, under the BLM’s Proposed Action, the Hollsiter Field Office would develop a more flexible strategy (i.e. through adaptive management) to determine when it is necessary to restrict vehicle use during periods of extreme dry and wet weather in areas where vehicle use may compromise the integrity of the road surface and/or public safety.

#8. Under Alternative E and the BLM Proposed Action (TRANS-E3 & TRANS-E4), BLM would designate the Tucker, Condon, Cantua, and San Benito River Zones as "Limited" vehicle use areas and prepare Travel Management Plans to designate routes of travel. Vehicle use in the Tucker, Condon, Cantua, and San Benito River Zones would be limited to highway licensed vehicles and ATV/UTV use only on designated routes (including potential routes and route construction proposals) identified on the Proposed Action Map in Appendix I.

Within 5 years of the Record of Decision for the CCMA RMP, BLM will prepare a Travel Management Plan to designate approximately 30 miles of routes and trails in the Tucker and Cantua Zones that would be developed and maintained to support non-motorized recreation opportunities using the route designation methodology described in Appendix II and 43 CFR 8342.1 minimization criteria.

Comment: Potential Effects for San Benito County	**Recommendation**
Biological Resources: • The management of biological resources discussion includes control of non-native wildlife species (pages 51 and 89). Further specification of what control measures will be used is needed.	-none-

BLM Response: There are no actions planned to control non-native wildlife species in the CCMA. Specification of control measures would be provided to the appropriate agencies in the event control on non-native wildlife species is needed.

Comment: Potential Effects for San Benito County	**Recommendation**
Recreation: • San Benito County is very concerned that restrictions on motorized vehicle recreation within the CCMA will adversely affect recreation opportunities and related businesses within the County and the region as a whole. Additionally, the RMP does not appear to contain a discussion about how restrictions in the CCMA will impact Hollister Hills State Vehicular Recreation Area in the long-term, though mention is made that increased wear and tear on Hollister Hills may encourage some people to seek out OHV opportunities in other locations, legal or not. • Page 85 mentions improved recreation opportunities in the Cantua, Condon, and Tucker Mountain Zones under Alternative E. More specific information about these opportunities would be useful in analyzing their impacts. The alternative maps do not elaborate about the specific location, type, or size of these facilities. Is the "potential public route" in the Cantua Zone related to these proposed recreation opportunities?	-none-

BLM Response: Please refer to BLM Common Response Section 4B, 4C, and 4D.

Comment: Potential Effects for San Benito County	Recommendation
General: • BLM has utilized a preferred project alternative with a menu approach to responding to the issues before them. Under Section 15126.6(d) of the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) would typically present environmental impacts of the proposal and alternatives in a comparative form, allowing for meaningful evaluation, analysis, and comparison. While an EIS prepared by a Federal Agency is not required to follow CEQA guidelines, the Preferred Alternative does not include all actions that would take place from the menu approach. This alternative could be further clarified. • The Superfund Atlas Operable Unit and Coalinga Operable Unit are delineated on all of the alternative maps except for Alternative E. Was this an oversight? • Since the temporary closure of the CCMA, significant revenue has been and will continue to be lost adversely affecting local and regional businesses due to the closure. Due to the temporary closure of Clear Creek, the Hollister Hills OHVA is full by 10:00 a.m., and frequently has to turn people away, further hurting the economy of the area, and forcing people to go further away for OHV activity. More analysis should be provided on this important issue, as area businesses and the County are very concerned. • Resource damage is occurring due to the temporary closure, both within Hollister Hills, as well as the general area. • More independent research and peer review needs to be done regarding the specific health risks of the asbestos, and more research needs to be conducted on the difference between asbestos and chrysotile, as the latter appears common to many counties in California and appears to be more benign. The EPA study needs to be peer reviewed prior to adoption of any permanent closure.	-none-

BLM Response: Table 2.6 of the PRMP/FEIS presenta summary of environmental impacts from the range of alternatives to allow for a meaningful evaluation, analysis, and comparison to inform the public and decision-makers.

The Superfund sites should have been included on the Alt. E map in the Draft RMP/EIS.The Superfund Atlas Operable Unit and Coalinga Operable Unit are delineated on all of the alternative maps in the PRMP/FEIS.

Please refer to BLM Common Response Section 1A and 1B.

AG-CAOHVC: California State Off-Highway Motor Vehicle Recreation Commission

Comment:	Recommendation
The Commission understands and recognizes the BLM is facing many challenges and is under significant	On behalf of the California Off-

pressure to meet project deadlines throughout the state. However, the CCMA is currently closed and therefore poses no health risk to the public at this time. In view of this, it is the belief of the Commission that an action as significant and far-reaching as permanently closing the CCMA to OHV use requires thoughtful consideration by all interested parties. Therefore, given the amount of time required by the BLM to prepare the in-depth Draft RMP/EIS, it is only fair the public be given further consideration, and for that reason, sufficient time to review these large and complex documents. The decisions generated by this Draft RMP/EIS will have far-reaching impacts and are important to the entire California OHV community. To this end, the constituents of the Commission and the BLM should be afforded the necessary time to provide thoughtful comments. Thank you for your consideration.	Highway Motor Vehicle Recreation Commission (Commission), I respectfully request an extension of the public comment period for the Clear Creek Management Area (CCMA) Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS).

BLM Response: The public comment period was extended for an additional 45 days.

AG-CANAHC: California Native American Heritage Commission

Comment:	**Recommendation**
The Native American Heritage Commission (NAHC), the State of California Trustee Agency for the protection and preservation of Native American cultural resources (c.f. CA Public Resources Code §21070; also of. Environmental Protection Information Center v. Johnson (1985) 170 Cal App. 3'' 604), was able to perform a record search of its Sacred Lands File (SLF) for the affected project area (APE) requested. The NAHC SLF search **did not indicate** the presence of Native American cultural resources within one-half - mile radius of the proposed project (APE). There are, however, Native American cultural resources in close proximity to the APE.	Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. Consultation with tribes and interested Native American consulting parties, on the NAHC list should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f)]et seq), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ: 42 U.S.C. 4371 at seq) and NAGPRA (25 U.S.C. 3001-3013), as appropriate..

BLM Response: Thank you.

AG-WRCD: Westside Resource Conservation District

Comment: General	Recommendation
The death and destruction caused by the 1995 Arroyo Pasajero flood was due largely because of the abnormally high sediment load in-stream at the time of the flood. Since 1996 the Westside Resource Conservation District has supported the efforts of the Stewards of the Arroyo Pasajero to stabilize soils in the upper watersheds of Clear Creek and Los Gatos Creek. Livestock ranchers have developed ranch plans that include distributing water to areas far from streams to minimize the trampling of stream banks, which causes soil erosion. The soils in the upper Los Gatos Canyon watershed are extremely erodible. The construction and use of new dirt roads in the upper Los Gatos Canyon watershed would cause a huge increase in soil erosion and sediment loads in Los Gatos Creek. This is precisely the environmental degradation the Stewards of the Arroyo Pasajero have sought to reduce. Any activity that increases soil erosion and sediment loads in Los Gatos Creek categorically contradicts long standing Westside Resource Conservation District policy of stabilizing upper watershed soils in the Arroyo Pasajero catchment basin. The Westside Resource Conservation District has also supported the closure of the Hazardous Asbestos Area for public health reasons. Any new or renewed off-road vehicle activity in that area will cause human respiratory illness and is opposed by the Westside RCD. The Westside Resource Conservation District also opposes a shift away from grass-fed beef production to accommodate recreational uses of Bureau of Land Management properties in the upper Clear Creek watershed. Range fed beef is the low carbon sector of our domestic beef production in the United States. Replacing natural forage-based meat production with carbon-intensive ORV activity denies the reality of the carbon restricted economy of the twenty-first century. For the above reasons, the Westside Resource Conservation District opposes any new or renewed use of off-road vehicles in the Clear Creek Management Area. Of the seven alternatives set out in the Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement, Alternative G comes the closest to restricting ORV use sufficiently. Any off-road vehicle activity would cause increased sediment in area streams and larger flood flows than if ORV use were banned altogether. The Westside Resource Conservation District supports the complete closure of the Clear Creek Management Area to off-road vehicle use.	-none-

BLM Response: Soils of the CCMA are introduced and described in the CCMA RMP Chapter 3.8 (includes Soils Map 5) and analyzed in Chapter 4.8. Table 3.8-1 and Map 5 identify soil series of the CCMA and factors important to soil erosion including slope, permeability, surface run-off class, and erosion hazard.

Soils within the Serpentine ACEC of the extreme uppermost reaches of White Creek within the Los Gatos Canyon watershed are primarily of the following series: Atravesada-Pits; Atravesada-Pits, asbestos complex; Hentine-Franciscan rock outcrop complex; and Dumps-Pits, complex, asbestos. There are extensive natural serpentine barrens and disturbances associated with asbestos exploration and mining (Atlas Mine). Erosion hazard is generally moderate to severe due to steep slopes and poor vegetative cover on the natural serpentine barrens and asbestos exploration disturbances. This results in very high sediment and debris (cobble – boulder-sized rocks) loads within White Creek, much of which is due to high background sediment levels from the natural barren areas.

Nonserpentine soils outside of the Serpentine ACEC, but within the CCMA, include the following series: Roacha-Millsholm-Lilten association; Lilten-Millsholm association; Millsholm-Borreguero complex; Anela-Vernalis association; Millsholm-Wisflat-Lilten association; Lilten-Grazer-Arburua association; and Rock outcrop-Borreguero complex. Erosion hazard is generally moderate to severe due to steep slopes.

Construction of any new routes within the CCMA would take soil erodibility into account, resulting in avoidance of soils having high erosion hazard and incorporating erosion control measures into route design. By taking these measures, soil erosion within- and sediment loads to the Los Gatos Creek watershed can be reduced.

AG-SJVRCD: San Joaquin Valley Resource Conservation and Development Council

Comment: General	Recommendation
The San Joaquin Valley Resource Conservation and Development Council promotes the wise use of natural resources throughout the seven county area from Stanislaus County to Kern County. We support conservation practices that prevent soil erosion, minimize sediment loads in streams and rivers, keep our air clean, and foster low carbon food production. The Bureau of Land Management proposals that would increase off-road vehicle use in the Coastal Range of western Fresno County would increase soil erosion, flood damage, air pollution, and the carbon footprint of local meat production. Given the fragility of the soils in the upper Los Gatos Canyon watershed, the construction and use of new dirt roads in the upper Los Gatos Canyon watershed would cause a huge increase in soil erosion and sediment loads in Los Gatos Creek. You may recall that it was Los Gatos Creek along with the other streams of Arroyo Pasajero that tore out the bridge on Interstate 5 in 1995, resulting in five deaths. This is precisely the kind of environmental degradation and public safety hazard our Council seeks to prevent. With regard to air quality, the dust stirred by off-road vehicles, the fine particulate matter emitted by their engines and the emissions of oxides of nitrogen from their engines are all harmful to human health. One in six school children in the San Joaquin Valley has asthma exacerbated by bad air quality. Bad air quality in the San Joaquin	-none-

Valley also shortens the lives of 1,200 elderly people annually. To knowingly increase fugitive dust, PM 2.5 engine emissions, and oxides of nitrogen by establishing new ORV roads and campground facilities for new and renewed off-road vehicle use in the Coastal Range amounts to a willful disregard of the resulting respiratory illness among our most vulnerable Valley residents.	

BLM Response: See response to comments from Westside RCD above.

Table X-2 (cont.) Comments from Organizations and BLM's Response

ORG-AMA36: American Motorcycle Association, District 36

Comment: Organized Events	**Recommendation**
As your office is well aware, many of our bay area members and indeed thousands of our riders and clubs throughout northern California have used this unique facility for decades. In fact the Salinas Ramblers regularly hosted what was the longest running nationally sanctioned enduro at the CCMA for many years. Additional events at the CCMA hosted by other clubs and groups have a long-standing history and would be a huge loss to the surrounding area both socially and economically.	-none-

BLM Response: Section 3.1.4.1 of the Draft RMP/EIS acknowledges the long history of organized events in CCMA, and Section 4.1.4.1 states "the restrictions on [special recreation permits] for organized events in the ACEC would have major long-term negative impacts on OHV clubs and groups that have historically held competitive motorcycle races, jeep tours, and other events; as well as any other organizations or clubs that promote group activities in the Serpentine ACEC because of the lost opportunity for fundraising and events sanctioned by the American Motorcycle Association."

Comment: Social and Economic Impacts	**Recommendation**
The financial repercussions from the current closure at the CCMA have been felt throughout the surrounding communities. Aside from the local motorcycle shops, numerous other local business owners, many of whom may have no personal interest in motorized recreation, expressed concerns with the effects they have experienced first hand. Loss of revenue to local stores, hotels, gas stations and the carry-over effect created in these communities cannot be overstated. Likewise loss of income from ongoing projects at the CCMA, and the job losses directly and indirectly associated with them can only further compound the effects of this closure.	We further request that BLM formally announce its intent to re-initiate scoping, which must involve all affected organizations, private property owners and individuals. This should

A full review and documentation of the economic impact this closure corresponds to must be undertaken. The fact that the BLM only saw fit to reach out directly to the business community less than 2 weeks ahead of the comment deadline was a serious oversight on the agencies part. These proprietors need time to fully articulate and document the financial effects they have experienced during the current interim closure. Equally important, this data will fully illustrate the future monetary impacts of a permanent closure of the CCMA would have on local businesses. It is our contention that The DEIS is fatally flawed because it did not properly analyze the socioeconomic impacts to local and regional businesses including restaurants, motorcycle shops, hotels, sporting goods stores, gas stations, and grocery stores. This important omission must be addressed prior to a record of decisions being issued.	include a thorough analysis of an alternative that will both maximize resource protection and recreational opportunities in the Clear Creek Management Area.

BLM Response: The CCMA Draft RMP/EIS and the Proposed RMP and Final EIS present the baseline for current social and economic conditions in Section 3.15. In particular, Section 3.15.4.4 describes the contributions of recreation opportunities to social and economic conditions within the Planning Area, specifically noting that "data shows that travel and recreation in San Benito County generate some $78,300,000 in spending in the county, $25,300,000 in earnings, and 940 jobs in the county (directly and indirectly). This amount ranks San Benito number 47 of 58 counties with revenues generated and number 52 of 58 counties with jobs created from travel and recreation tourism (Dean Runyan Associates, Inc. 2009)." Additionally, the CCMA Draft RMP/EIS states "much of the economic benefit for income and employment, from people's expenditures for motorized recreation, appears closer to the urban homes in the visitor-shed, than in the communities near the CCMA. Other factors that influence economic conditions are associated with restaurants, lodging, and gas stations where visitors spend money traveling to and from the CCMA. Purchases of vehicles for recreation use are prime examples of big-ticket expenditures that occur at considerable distances from the CCMA, although several notable retail motorcycle and OHV businesses are located in San Benito County."

Section 4.15 describes the socioeconomic impacts to local and regional businesses from CCMA land use decisions unde the range of alternatives and the Proposed Action. More specifically, Section 4.15.2.4 provides an overview of impacts from recreation and transportation management actions. Based on likely increases in visitor use levels as the population increases and "competition for recreation space accelerates", BLM determined that "annual expenditures in support of recreation on public lands in the CCMA might reach as much as $4 million in current dollars."

During the social and economic workshop to discuss effects to social and economic values, participants insisted that BLM overlooked the financial repercussions of CCMA land use decisions on other local businesses, many of whom may have no personal interest in motorized recreation, still experienced loss of revenue.

Based on these public comments, the following statement has been added to Section 4.15.2.4 of the CCMA PRMP/FEIS:

Aside from the local motorcycle shops, recreation opportunities in the CCMA also contribute revenue to other local and regional businesses including restaurants, hotels, sporting goods stores, gas stations, and grocery stores in these communities. Likewise, income from ongoing

projects at the CCMA, and the job directly and indirectly associated with them provide benefits to social and economic conditions in the Planning Area.

Comment: Range of Alternatives	**Recommendation**
On numerous occasions the BLM staff has repeatedly and publically encouraged riders to request a major modification to or the creation of an entirely new trail system at the CCMA. It is well know that the Salinas Ramblers Motorcycle Club worked hard to formulate their draft alternative, incorporating their preferred management alternative. They did this both to assist the agency and better convey their desired management strategy in a comprehensive manner. Serious consideration must be given to this proposal as it represents a good balance between protection of both specific areas and recreationists and providing sufficient recreational opportunities for the future. The BLM would indeed find wide spread support for this idea, however given that a "citizens prorecreation alternative" has in fact been previously submitted and rejected (during the 2007 DEIS process) it is difficult to again request the recreation community put much effort into developing yet another alternative. Instead we request the staff revisit and reconsider the previously submitted documents (we can assist with providing another copy if necessary). This "new trail system" idea, while encouraging, further illustrates the ongoing frustration felt by many who have tried to work with the BLM previously. A re-route of those trails that the agency feels present the highest potential for exposure should have been included in this document. Literally years have gone by yet this idea is no more developed than it was the last time the public was asked to be involved.	Creation of a viable, challenging and long term sustainable trail system at the CCMA has long been the goal of many in the riding community. Access to privately held lands, opportunities for other motorized recreationists as well as protection of the resources are all part of a well developed and managed facility, and something the public has repeatedly requested and demonstrated a willingness to support. Indeed direct financial support (day use permits, annual passes and OHV grants) as well as volunteer efforts (such as fencing of threatened and endangered species) had been ongoing until the emergency closure was implemented. The agency has a ready partner but has simply not taken full advantage of the opportunity presented. As a result of this deficient process one or more viable, if not superior, alternatives have been omitted from the DEIS.

BLM Response: Refer to Common Response Seciton 3A.

Comment: Health and Safety Mitigation Measures	**Recommendation**
In the current DEIS the BLM incorrectly asserts that OHV users would not be willing to use a wash rack at the agency's new decontamination center located at the main entrance to the CCMA. In fact it is our contention that the vast majority of riders would jump at the chance to wash off their vehicles before leaving the area. If needed, a study should be done to analyze user compliance with a wash rack facility before assuming and incorporating the idea that it wouldn't be utilized into any alternative.	-none-

Likewise if the plan for the newly constructed washout station had been fully presented to the public the BLM could have better utilized the facility as both a clean up station and welcome center for arriving visitors. The chance for agency staff to have a face to face conversation with riders and help explain any current issues facing the CCMA would only help the public to better comply with and understand agency management decisions and strategies. A valuable opportunity was lost when the decision to construct this expensive facility didn't include a welcome center component.	

BLM Response: Inserted the following paragraphs into Section 4.2.4.1:
"Public comments from representatives of the American Motorcycle Association District 36 (and other planning participants within the OHV community) contend that the vast majority of riders would jump at the chance to wash off their vehicles before leaving the area and recommend the newly constructed decontamination facility be utilized as both a cleanup station and welcome center for arriving visitors. This would provide the opportunity for visitor outreach and education to explain CCMA resources concerns and land use management issues.

Although many CCMA visitors may be willing to use vehicle wash racks, it is not feasible to maintain the cost of operating a state-of-the-art decontamination facility to industrial hygiene standards for public use. Furthermore, the effectiveness of this mitigation measure is limited because only one vehicle can be decontaminated at a time and it is unclear whether there are water resources available for public use of the decontamination facility to support the visitor use levels under the range of alternatives."

Comment: EPA Risk Assessment	**Recommendation**
If the agency is serious about their desire to create a new system of routes one of the first issues it must address is the visitor use scenarios regarding time spent traveling on routes in the ACEC. The human risk analysis contains a number of flawed assumptions, such as stating the average speed dirt bikes travel on single-track trails is 15-20 mph. With the exception of a few national caliber riders few if any have ever maintained such speeds over any long time frame on single-track trails. The DEIS is also flawed because it ignored the recent 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. The BLM must analyze all currently available science before permanently closing CCMA to OHV recreation. 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." Incredibly this narrative does not	-none-

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 actually try to avoid riding in a dust cloud. The EPA Risk Assessment is also fatally flawed because a majority of the samples were collected during dry periods when Clear Creek was in fact closed to the public. Also over use of Clear Creek Road during sample collection presents a major flaw in the riding simulation as it does not accurately represent the trail based experience the vast majority of riders come to the CCMA for. The vast majority of rider would in fact avoid the road as it lacks the very challenge they are seeking. Safety concerns would in fact force riders to alter greatly their typical riding style (speed and distance between riders for example) when on the road due to potentially encountering larger vehicles. While it appears the sample includes a 30% road use average a more realists one would be less than 10% and as such could have had a major impact on sampling and test results observed.	

BLM Response: Refer to Common Response Section 1C.

Comment: Cumulative Impacts Analysis	**Recommendation**
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 both the Economic impact meeting and the OHMVR Commission meeting illustrated that displaced CCMA OHV riders are now threatening to overcrowd other regional OHV areas that include the Jawbone OHV Area, Hollister Hills, Prairie City and Carnegie. A Cumulative Effect analysis must be included in this planning process. Visitor surveys have shown that 80% of the past visitors at the CCMA were in fact motorcyclists yet the agency identified and historical use at CCMA. The preferred alternative should include a similar motorcycle trail mileage to what was preferred alternative has no provisions for motorcycle recreation. This would represent a total reversal of the current available before the emergency closure.	If indeed a visitor health risk is identified by a new assessment or a review of the EPA's latest report, the BLM should use signs and educational outreach as a way to inform the public and allow them to make their own decisions rather than closing this important OHV area on a permanent basis. Other state and federal agencies have utilized similar methods to both inform the public and minimize liability and there is no reason to discount the value of such efforts in this case.

BLM Response: Refer to Common Response Section 4D and 4E.

ORG-ALAA: American Land Access Association

Comment: American Lands Access Association Proposal	**Recommendation**
As an American Lands Access Association Representative I am proposing the Bureau of Land Management Hollister Field Office follow other California BLM District's proven procedures for dealing with public land use issues which are so complex and set up a Clear Creek Management Area Advisory Council Committee. This approach is working in other California BLM Districts and provides the Public, Elected Officials, Professional Consultants, Geologists, Ecologists, Botanists, Federal Grazing, National/Regional Environmental, Wildlife, Non-Renewable Resources, Renewable Resources, Transportation/Rights of Way, and Recreational interests opportunities to work with the Bureau of Land Management in Using, Sharing, and Appreciating the Clear Creek Management Area while complying with the National Environmental Policy Act (NEPA). This is a reasonable proposal which promotes an environmentally harmonious approach to providing respectful, compliant, and cooperative solutions to CCMA's social, political, and environmental concerns.	The American Lands Access Association (ALAA) respectfully requests an opportunity to be represented in a Hollister BLM Field Office CCMA Advisory Council to ensure the American Lands Access Association's concerns are reasonably and appropriately addressed.

BLM Response: BLM currently supports a Central California Resource Advisory Council (RAC), including an OHV sub-committee, which comprises a diverse group of representatives from various backgorounds (i.e. recreation, ranching, conservation, elected officials, etc.) that meet quarterly to address resource management issues and promote public participation in BLM decision-making processes.

The Central California RAC consists of 12 members that advise BLM officials for the Hollister, Mother Lode, Bakersfield and Bishop field offices aimed at achieving a balanced outlook that the BLM needs for its mission, which is to manage the public lands for multiple uses.

Individuals may nominate themselves or others to serve on an advisory council. Nominees, who must be residents of the state or states where the RAC has jurisdiction, will be judged on the basis of their training, education, and knowledge of the council's geographical area. Nominees should also demonstrate a commitment to consensus building and collaborative decisionmaking. All nominations must be accompanied by letters of reference from any represented interests or organizations; a completed background information nomination form; and any other information that speaks to the nominee's qualifications.

Nomination forms and additional information about the Central California RAC are available on the web at http://www.blm.gov/ca/st/en/info/rac/ccrac.html

ORG-BAM: Bay Area Mineralogists

Comment: General	**Recommendation**
Most rockhounds live some distance from CCMA and must drive 2 hours or more to get to the CCMA entrance. Carpooling is commonly practiced, and passenger loads of 2-3 persons per vehicle are the norm for day trips. Arriving at or before dawn is generally not practical. Typically another hour(+/-) of low speed driving over the CCMA road system is required to reach a rockhounding destination, and typically trips are limited to one or, at most, two collecting destinations per trip. Trips may be planned for 1, 2 or in the case of long weekends, 3 days duration. Multi-day trips necessitate overnight camping, which usually involves sleeping inside one's vehicle; tents are rarely used. Because the known and probable rockhounding sites are widely dispersed within CCMA; the serpentine zone is not suitable for extended hiking; and most rockhounds are too old to endure extended hiking, rockhounds have always utilized the network of roads and jeep trails maintained by BLM to drive to within a few (i.e. less than 100) yards of their collecting destination. Steel hammers, chisels and pry bars are the usual equipment, and these tools militate against long treks from one's car. The preferred seasons for rockhounding are Spring and Fall when roads are clear, and temperatures are moderate. Arbitrarily selected closure dates frequently do not reflect these conditions. All rockhounds polled for this document indicated that their needs can be accommodated by 6 visits per year or less. The economic impact to the local economy for the Bay Area groups included in this proposal is probably $100-150 per vehicle per Clear Creek visit, that money being spent in Hollister and/or Tres Pinos for meals, gas and groceries.	In the spirit of a "menu driven" approach to the Alternatives, we suggest that **Alternative E (or whatever Alternative BLM adopts) can be modified to accommodate rockhounds by including the following features:** **a) Explicitly and formally designate rockhounding as an authorized recreational activity in CCMA** **b) Authorize up to 6 rockhound visits per year under permit** **c) No visit to exceed 3 days/2 nights** **d) Authorize rockhound access to the existing network of roads and jeep trails within CCMA, including the serpentine zone.** **e) Authorize up to two consecutive nights of overnight camping per visit adjacent to rockhounding sites.** **f) Authorize visits at any time of year that temperature and road conditions permit** **g) Rockhounds to use full size vehicles only and only on R- or T- designated roads**

BLM Response: Refer to Common Response Section 3D.

Comment: Asbestos Exposure	**Recommendation**
Given the statistical padding and methodological uncertainties of the 2008 EPA Risk Assessment (the "EPA Study") it is our position that up to 6 visits per year can be accommodated for rockhounding activities without exceeding the CERCLA Acceptable Risk Limit. Noteworthy components of this position are as follows:	Even accepting EPA's risk assessments (which in general, we do

a) Our greatest exposure to dust occurs during the drive in/drive out activities on the primary access roads, i.e., R001 and R011. By authorizing overnight camping at the collecting sites, we can eliminate successive drive in/drive out events related to a 2- or 3-day visit. We do not object to the imposition of speed limits or the posting of minimum following distances. Due to road conditions, travel on the interior roads of the ACEC (i.e. roads other than R001 and R011) is generally done at speeds significantly less than 10 mph, which generates very little dust. CONTINUED ACCESS TO THESE INTERIOR ROADS IS CRITICAL TO THE ROCKHOUNDING COMMUNITY. b) Because we tend to be stationary in our on-site activities, it is our view that while actually recreating in CCMA, we would generate less dust than hikers or hunters, which is to say, virtually none. c) EPA explained that camping activities produced unexpectedly high asbestos readings because campers slept close to the ground, and the activities associated with setting up camp, cooking, socializing generated dust. Rockhounds generally do not camp in tents or on the ground as theorized by EPA, preferring to sleep in their vehicles. Moreover we tend to go to bed early and do not ordinarily stay up to socialize. Meals are simple; cookouts are not the norm.	not), rockhounding in accordance with the above proposals should keep rockhound asbestos exposures within limits that are acceptable by EPA/CERCLA standards.

BLM Response: Refer to Common Response Section 1D and 4B.

Comment: Explicit Authorization of Rockhounding	**Recommendation**
As often is the case in Federal land law, rockhounds' rights to access and collect are not explicitly addressed in the Draft. Rather it is necessary to infer from the various proposals and analyses in the Draft what rockhounds may do without violating the various restrictions. Moreover, rights implied but not explicitly granted can be more easily taken away at a later date. We believe that in view of the unique mineralogical values present in CCMA, the final RMP should explicitly authorize rockhounding in CCMA and make specific provisions related to that activity.	The East Hernandez Landowners have made a proposal to provide BLM and the public with rights-of-way to the Tucker Zone if BLM designates the latter a "Wildlife Conservation and Wilderness Study Area". Although not explicitly stated in their February 20 proposal, it is the landowners' intent that rockhounding and fossicking should be permitted in this area. This was explicitly stated in the February 22 meeting at San Juan Oaks. Subject to BLM's acceptance of this condition, the rockhounding community supports the landowners' Tucker Zone proposal

BLM Response: Refer to Common Response Section 3D.

Allowable uses under the range of alternqatives for the CCMA Draft RMP and EIS (2009) and this PRMP/FEIS are identified in Table 2.4-1. Under the "Proposed Action" analyzed in this PRMP/FEIS, non-motorized recreation opportunities, including hobby gem and mineral collection (i.e. rockhounding), would be considered an allowable use in the Serpentine ACEC and the Tucker management zone (ref. Table 2.5-1).

Comment: Access Routes & Times	**Recommendation**
Collectible mineral species are usually found at the contact of two rock types, such as the basaltic serpentine intrusion and the surrounding or enclosed Franciscan rocks of San Benito and Fresno Counties. Not surprisingly, therefore, collectible minerals in CCMA are almost exclusively found on the immediate perimeter of the serpentine emplacement (the ACEC) and in the calc-silicate outcrops <u>within</u> the serpentine zone. These outcrops are scattered around the ACEC, some near the periphery but some also in the heart of the ACEC. Alternative E would restrict vehicles to R011 and permit only foot access to areas within hiking distance of R011. This is not acceptable. Most rockhounds accessing CCMA are over the age of 45, some over 70. For people in this age group rockhounding offers an ideal means of obtaining light recreation in the out-of-doors. However, for this age group extended hiking in potentially extreme weather conditions on hilly terrain is not practical and is potentially dangerous. Alternative E as currently proposed (traffic limited to R011) would so limit the access by Seniors to CCMA that it would effectively constitute **age discrimination.** Historically the rockhounding community has been able to utilize the road and trail network maintained by BLM <u>within</u> the serpentine ACEC to gain access to collecting sites that could be reached only with a great deal of difficulty on foot. The ability to drive to close proximity of collecting sites has always been an important consideration in the popularity of CCMA. **THIS IS CRITICAL. Any proposal intending seriously to meet the needs of rockhounds, mineralogists and geologists must provide for continued access to the unpaved roads and trails network within the ACEC as well as for the continued maintenance of said roads and trails.** Permits would be an acceptable means of securing such access. It is noteworthy that while mineral collectors are interested in the entire spectrum of mineral species in CCMA (including those at the Clear Creek Mine), lapidarists are interested primarily in CCMA's jade and "plasma agate" which are only found at or in close proximity to the Clear Creek Mine. **For purposes of accessing these resources, some means of permitting limited access to R001 must be provided.** The Draft prominently proposes "surface hardening" and "dust suppression" treatments of the "designated route	Our proposal is that visits should be permitted 6 per year with potential duration not to exceed 3 days per visit. This scenario will accommodate even the most active members of our fraternity. For the vast majority of rockhounds actual usage will probably not exceed 3 visits/6 days per year under this proposal. Seasonal restrictions should be governed by the practical realities of CCMA. In the summer it can become too hot to collect, and in the winter it may to too cold, too rainy or the roads too impassible. Access and collecting should be broadly permitted as the seasons dictate, including warm winter days or cool summer days. Arbitrary date cut-offs may needlessly limit collecting opportunities. Dawn-to-dusk access limits and

network". If these measures are feasible and money is available for them, they would be welcome improvements. However, treating R011 at the cost of prohibiting travel on the existing network of roads and jeep trails is not a fair trade-off and would benefit environmentalist sightseers, whose destinations lie on or within easy reach of R011, at the expense of rockhounds whose destinations do not lie on R011. Preliminarily we would like to point out that the EPA Scenarios were constructed to simulate fiber exposures per visit, not per day. The Draft seems to have dropped that distinction, as use restrictions seem invariably to be stated in "days". This becomes an issue when evaluating the most expedient way to reconcile the practical needs of the activity with the restrictions that BLM deems necessary to promote health and environmental values, such as minimizing "drive in/drive out" exposure through overnight camping.	day-use-only restrictions would, in most cases, negatively and severely impact rockhounding activities, especially if combined with road access limitations (such as limitation to R011). From an asbestos-avoidance perspective as well as a practical one, rockhounds need the ability to camp over and not have to leave at dusk.

BLM Response: Refer to Chapter 2: Section 2.3.1, which describes major changes to the "preferred alternative", which include "approximately 21 additional miles of vehicle routes in the Serpentine ACEC have been added to the area designations for limited vehicle use under the Proposed Action that include major routes R1, R10, R13, R14, R15, and other minor routes including T103, T104, T151, T153, and T158."

Comment: Camping	**Recommendation**
The Draft is not very explicit about where and under what circumstances camping will be permitted. It seems to suggest that camping will only be permitted in the Jade Mill campground. That would seem to benefit only hunters, as the Jade Mill will not be accessible from the New Idria entrance and R001 would be closed. This is not practical for rockhounds.	Most rockhounds drive 100 miles or so to access CCMA, so they are usually loathe to limit their visits to a single day trip. Two-day excursions are preferred, which necessitates camping at least one night, usually sleeping in the back of one's vehicle. Permission to stay over one night (two nights in the case of 3-day weekends) must be granted by BLM

BLM Response: Refer to previous response regarding publc access and vehicle use on major roads in the Serpentine ACEC. As indicated on page 35 of the CCMA Draft RMP and EIS (2009), recreation management action **REC-USE-B1** would prohibit camping in the Serpentine ACEC, except for Jade Mill campground because this site has already been developed and overlays non-serpentine soils that reduce exposure to airborne asbestos emissions to acceptable levels. Under the "Proposed Action" analyzed in this PRMP/FEIS, non-motorized recreation opportunities, including overnight camping, would be an allowable use in all the non-ACEC management zones (ref. Table 2.5-1).

Comment: Access Permits	**Recommendation**

To the extent that BLM wishes to control access by means of permits, rockhounds should not, in general, find them objectionable per se. Administrative procedures should be implemented to make the permits easy to obtain, e.g., by mail.	-none-

BLM Response: Under the proposed permit system, BLM would develop a process to make permits easy to obtain similar to other special recreation management areas administered by BLM.

Comment: Collecting Sites	**Recommendation**
Beauty is in the eye of the beholder. Conservationists may see a scattered mine dump as an eyesore to be remediated and strewn with wildflowers. To mineralogists, these same dumps are virtual playgrounds, some with on-site antiques to be photographed or painted. Abandoned mines and mine dumps are rich mineral collecting sites where mining activities have utilized the mechanized tools of the industry to bring mineral specimen material from the depths of the mines and put it on the surface where it can be examined by mineralogists. The Clear Creek Mine, in particular, has been the source of many newly described mineral species which would have remained undiscoverd if not revealed by mining activities. In contrast, the reclaimed Aurora Mine property is now a mineralogical/rockhounding dead zone. While we recognize the possible need to prevent contamination of streams and groundwater by mine wastes, such remediation should be planned and executed with an eye to preserving access to these mineralogical resources to the maximum extent possible. Burying these valuable mineralogical resources would be a crime. The rockhounds' aesthetics are no less valid than those of the conservationists. Where naturally occurring contamination is the source of undesired stream runoff, remediation is unlikely to eliminate pollution in any event, and it is preferable to preserve the availability of collectible mineral species at such sites.	-none-

BLM Response: Refer to the energy and minerals discussions in Sections 3.12 and 4.12 of this PRMP/FEIS for an explanation of BLM's abandoned mine lands program and the associated impacts to the enviropnment.

Comment: Integrated Risk Information System (IRIS)	**Recommendation**
The formal basis for EPA's risk assessments at CCMA is EPA's so-called "IRIS" standard, which was developed in 1986. IRIS in turn was based on 14 epidemiological studies performed by researchers in the 1970's and 1980's. Generally these studies correlated, for persons who had been subjected over several decades to substantial occupational exposure to "asbestos" fibers, death records of respiratory disease with the length and extent of asbestos exposure. In these studies "asbestos" was presumed to mean one or more of six commercially used mineral species. Although a primary species was generally identified, none of these studies examined the specific mineral content of the asbestos in any detail. These studies relied for quantification of "asbestos" fiber counts in the workplace on PCM technology or, worse, subjective estimates of what had been present in the workplace decades before. The author of the IRIS study, Dr. Nicholson, was also the author of one of the anti-asbestos studies included. Thirteen of the 14 studies were anti-asbestosis studies, and Dr. Nicholson re-wrote	-none-

the 14th study to comply with his vision. The study calculated mean risk values for occupational exposure (now used by OSHA) and more conservative 95th %ile Upper Control Limit ("UCL") values (or some similarly padded number) for environmental exposure which have been used by EPA at CCMA and elsewhere. These UCL factors estimate a significantly higher risk of disease by a factor of between 2 and 20 than the OSHA number. The Nicholson study precipitated the public hysteria over asbestos in schools and public buildings which has since been determined to have been unwarranted. Since 1986 the IRIS standard has not been revised despite new studies relating to specific mineral species and their culpability in lung disease. Significantly, new studies have indicated that chrysotile (the most common asbestos type in CCMA) is relatively harmless in recreational exposure doses; that non-asbestos minerals have been implicated in lung diseases in Asia Minor that were previously attributed to asbestos; and that tremolite (previously regarded as a contaminant in commercial asbestos) was implicated in the highly publicized employee mesothelioma scare at Libby, Montana where it comprised a whopping 25% of the ore mined for "vermiculite" products. ATSDR subsequently determined that the Libby employees were contracting asbestosis, rather than mesothelioma. Therefore the situation facing EPA is that their formal IRIS standard is now suspect with respect to chrysotile, while evidence is pointing to the 5 asbestos minerals known as amphiboles as the more likely health hazards. **The nature of the health hazard attributable to amphiboles, however, has not been quantified in any generally recognized study.** In this situation EPA has continued to defend the IRIS standard while alleging, **without government standards to support them**, that the amphibole minerals are even more dangerous than the IRIS standard would imply. In the context of CCMA, EPA has therefore collected numbers to demonstrate that the overall fiber load presents a risk according to IRIS but has also analyzed amphibole fibers in an effort to demonstrate that even if chrysotile turns out to be less dangerous than previously thought, there is still a dangerous amphibole burden at CCMA.	

BLM Response: Refer to Common Response Section 1C.

Comment: EPA Risk Assessment Methodology	**Recommendation**
The methodology of EPA's Clear Creek study is riddled with methodological problems which seem to have been contrived to assure the shutdown of CCMA. BLM's own toxicologist addressed some of these issues in his letter to Rick Cooper (Dr. Karl Ford, Feb 8, 2008), at the end of which Ford concluded that "a combination of some additional analyses…and continued monitoring and institutional controls governing where, when, how, and who can ride, may reduce risk into the [EPA defined] acceptable range…." Methodological issues with the EPA study, including those cited by Ford, include the following: 1. The CCMA study specified vehicle runs in northern CCMA to determine asbestos dust levels associated with scenario-	-none-

specific activities. All such runs were limited to Clear Creek Road between staging areas 1 and 4 and the trails immediately north and south of the road, including the Indian Hill and Alpine Mine areas. This area was known to be the historical center of mercury related industrial activity and concommitant pollution, and the geology of the Indian Hill area is known to contain amphibole minerals. Clear Creek Road itself is notoriously dusty. This area seems to have been selected to produce the worst possible dust readings in all of CCMA. Substantial tracts of CCMA land to the east, south and west of the survey area were not included in EPA's study. Trailing riders in the vehicle runs deliberately violated posted BLM rules about minimum trailing distances, intentionally riding in the dust plumes of the leading vehicles. 2. No record was kept of the specific routes taken by each rider in the study, making it impossible to correlate dust readings with soil samples. 3. Dust readings were correlated to rainfall records, but as Dr. Ford pointed out, they were not correlated to actual soil moisture readings which would have been more meaningful. The years in which the surveys were performed were particularly dry years and modest rainfall did not necessarily improve dust conditions, leading to higher dust/asbestos and amphibole readings. 4. The EPA study claims that nearly 8% of the fibers detected on the survey runs were amphiboles. However, 3/8 of those detected amphiboles were identified as "other amphiboles" which means any of approximately 75 mineral species in the amphibole family, none of which has historically been identified as "asbestos". This 3% is therefore presumably harmless, and its inclusion in the "nearly 8%" number is highly deceptive. The number of "asbestos" amphibole species detected is in truth barely 5% of the total fibers, virtually all of which were identified as actinolite. As noted at item12 below, there have been <u>no</u> epidemiological studies of the effects of actinolite on humans, and therefore there is no scientific basis for calculating risk posed to humans by actinolite in any kind of activity. EPA's assumption of human health risk from actinolite is purely speculative at this time. 5. The Nicholson IRIS study asserted that there is no threshold for adverse health effects due to asbestos, which is to say that any small amount could trigger negative health impacts. EPA has upheld this notion in its discussions relating to CCMA, especially with respect to amphibole minerals. Recent studies, however, have found that dose levels and the duration of time over which those doses accummulate are critical for even the most dangerous types of asbestos. In other words there is an exposure threshold under which health risks are not significant. EPA just doesn't have enough data to pinpoint those thresholds. 6. The EPA study is a case study in how to use statistics to distort the truth. Some of these "statistical" devices include the	

following:

- The inclusion of "other" amphiboles in the "nearly 8%" amphibole calculation referred to above.
- The omission of relatively asbestos-free lead rider data from from all scenario risk calculations. EPA 's rationale for this is that they are using "health protective" (i.e. worst case) assumptions.
- "Health protective" rounding of calculations in the computation of risks in the various study scenarios. Multiple calculations are required for each scenario. They add up.
- Redundant use of the "95th percentile Upper Control Limit" ("UCL"). EPA has asserted that this is a standard statistical tool. Indeed it is if one desires to make extremely conservative estimates of risk. It should be understood that OSHA adopted from the IRIS study a mean or average risk value for workplace safety issues, whereas EPA adopted a more conservative, padded number. There is some question whether it was a 95th UCL or not, but it is greater than the mean number used by OSHA. Using this already padded number as its risk factor, EPA calculated scenario-specific risks for CCMA, again calculating the 95th UCL of those field calculations and asserting that these artificially elevated numbers should be compared to EPA's acceptable exposure limit. This device alone virtually guaranteed a failing grade for most of the activity scenarios in Clear Creek.

Again, Dr. Ford said in his memo to Rick Cooper, "It is understood that EPA guidance has a preference for arithmetic means and 95% UCL, however, the limited information available to me suggests the data are probably log-normally distributed. If true, the arithmetic mean and 95% UCL may overestimate the true concentrations." Indeed.

7. The EPA Study was planned specifically to take advantage of newly available Transmission Electron Microscopy ("TEM") for the analysis of air samples. EPA's belief was that TEM is better able to identify individual mineral fibers and therefore counts made using TEM would be more accurate. The methoodological flaw in this thinking is that TEM will indeed produce a higher count on a given sample than PCM. However, the IRIS standards were derived by comparing health data with counts made using PCM. Using an analytical method that produces higher counts in conjunction with a PCM-derived IRIS standard will necessarily imply a higher level of risk than if the count had been made with PCM. In the words of Dr. Karl Ford, "The IRIS cancer slope factor is probably based on PCM, so use of TEM may overestimate risk."

8. EPA has routinely ignored and/or disparaged competent studies that have arrived at findings contrary to EPA's. EPA regularly asserts that such studies are biased or incredible because they are funded by industry and/or published in industry journals. (If industry doesn't fund these studies, who will?) In fact, many of these studies have been published in generally accepted forums such as the New England Journal of Medicine. A fair reading of these studies indicates that they are at least as well documented as any anti-asbestos study relied upon by EPA and in most cases more methodologically rigorous, precise and objective. In comparison, EPA itself acknowledges that the studies utilized in developing the IRIS model were

based on only rough estimates of asbestos exposure levels in industrial environments over many decades and on imperfect identification of asbestos species and causes of death. The non-EPA-sanctioned studies are entitled to objective and fair evaluation. 9. Current science suggests that chrysotile asbestos is subject to breakdown and expulsion by the body's defense mechanisms and that chrystoile fiber load from intermittent recreational exposures is ordinarily cleared in a matter of several days. It therefore poses little or no risk of health issues at recreational levels. EPA's IRIS model is currently being revised, at least in part to incorporate this emerging consensus. 10 Although the IRIS standard does not distinguish amphibole asbestos from chrysotile asbestos, EPA asserts that the former are even more dangerous than chrysotile and should be viewed with extreme caution. Currently the Best Available Evidence with respect to amphiboles is that a) asbestiform amphibole minerals are not susceptible to chemical breakdown in the body like chrysotile; b) at some level of exposure they can contribute to the likelihood of lung diseases, especially asbestosis; c) all humans acquire during their lifetimes some amount of amphibole fiber accumulation in their lungs, if only from ambient levels in urban environments, the vast majority without developing lung related diseases; d) the threshhold levels of amphibole fibers required to induce lung disease have not been established with any degree of reasonable certainty; e) EPA has offered "health protective" lifetime risk estimates that are greatly exaggerated by means of methodological biases and statistical padding; and f) Best Available Evidence suggests that although the health risks related to naturally occurring amphiboles are not zero, EPA has nevertheless grossly overestimated the risks, and this conclusion is supported by the absence of any epidemiological or anecdotal evidence of elevated lung health risks in real life among people who have lived, worked or recreated in CCMA. In other words, actual experience in CCMA does not bear out EPA's hypothetical risk calculations. 11. EPA has repeatedly asserted that children are at special risk from amphibole-induced mesothelioma, but BLM's own toxicologist has pointed out a recent study (Reid, 2007) indicating that dose and duration of exposure are the critical factors, not age of the subject. 12. Virtually all of the "amphibole" identified by EPA in CCMA was identified as actinolite. EPA (Den) asserts that actinolite is just as dangerous as tremolite based on its chemical similarity to tremolite. EPA toxicologists in North Carolina confirm that there have been **NO epidemiological studies** relating specifically to actinolite in humans to support this assumption. And as noted above there are no generally accepted risk characterizations for tremolite either. (Actinolite is a common mineral throughout California and no doubt comprises much of the ambient airborne asbestos in California's cities.)	

BLM Response: Refer to Common Response Section 1B, 1C, and 1D.

Comment: Procedural Compliance Issues (NEPA, FLPMA)	**Recommendation**
1. The Draft's planning objectives were stated in terms of generic boilerplate, never in concrete terms applicable specifically to the public uses of CCMA. This is a fundamental substantive breach of BLM's obligations under NEPA. This failure is one of the circumstances which leads many of CCMA's users to suspect a hidden agenda and a preordained outcome for this process. 2. The EPA Study of CCMA was clearly designed and implemented to "prove" a pre-determined result. (See "Methodology" above.) It is not the best available evidence. Worse, both EPA and, apparently, BLM have failed to give a fair and impartial review of conflicting studies and evidence. 3. Digesting and challenging the EPA study and the proposed RMP has been a daunting task to be performed in a 90-day period that included the Thanksgiving, Christmas and New Year holidays, not to mention Presidents Day, the Super Bowl, the Daytona 500 and the Tucson Gem & Mineral Show. The Draft itself is over 700 pages, and the effort required to seek out and digest the historical, legal and scientific issues related to the Draft is enormous. Dozens of people from multiple user communities have put in thousands of hours of effort to respond to the Draft. NEPA requires that our concerns be taken seriously. 4. Many of the studies relied upon by EPA and BLM are not readily available to members of the public, especially studies published in professional journals. As you know, there have been a multitude of FOIA requests in an attempt to get background information. EPA declined to provide us a copy of the TEM standard procedure on the ground that it was the proprietary property of the ISO. There are many such hurdles. Much important information necessary to understanding the EPA Study and the administrative history of CCMA has been difficult or impossible to obtain. 5. BLM's obligation to cooperating agencies under federal law is to give such agencies' inputs a fair and objective hearing, including concerns relating to human health and safety. However, it is a misreading of federal law to assert that BLM is somehow obligated to prohibit or limit use of CCMA on the grounds of air quality concerns while the ambient air in our home cities contains even more asbestos than CCMA air. It is not BLM's charter to assure a completely risk-free recreational environment in CCMA	-none-

BLM Response: Refer to Common Response Section 2A.

ORG-BRC: BlueRibbon Coalition

Comment: Science Flaws	**Recommendation**
Science Issue 1: Failure to Include BRC Scientific Submissions into the DEIS BRC staff and consultants submitted numerous scientific citations (e.g. papers, articles, etc). in a timely manner during the scoping process. These documents brought into question the methodology, findings, and conclusions of the 2008 EPA Risk Assessment. Yet, no discussion of said documents can be found in the DEIS. Science Issue 2: BLM's Attempt to Ignore or Discredit Public Comment According to documents discovered through FOIA, BRC finds the BLM acted in a deliberate and non-transparent manner in an attempt to discredit and discount BRC science materials. Science Issue 3: BLM Does Reference Questions in the DEIS by its own Toxicologists Regarding the EPA's Risk Assessment BLM's Toxicology expert, Dr. Karl Ford, on more than one occasion called into question the science and/or methodology of the RA. This information should be acknowledged by BLM. In fact, the questions raised by Dr. Ford imply that possible mitigation measures could be included in (or form the basis of) alternatives omitted from the DEIS. Instead, BLM appears to advance an "err on the side of closure" premise and withholds information inconsistent with or contradictory to that premise.	-none-

BLM Response: Refer to Common Response Section 1C and 1D.

Comment: Science Flaws (cont.)	**Recommendation**
Science Issue 4: The Risk Assessment is flawed because trailing riders rode in the dust cloud of the lead rider. Science Issue 5: The Risk Assessment is flawed because riders spent too much time on Clear Creek Road. Science Issue 6: The Risk Assessment sampling routes do not simulate a typical CCMA off-highway vehicle experience.	-none-

Science Issue 7: *Un-supervised test riders may have ridden off the prescribed course.* Science Issue 8: The EPA calculated health risks in the DEIS are inherently flawed because they are based on the original calculations in the original risk assessment. Science Issue 9: The test course included several historic mill sites where commercial asbestos (amphibole) was used. Science Issue 10: *The sampling is not representative of typical use conditions because most riding at CCMA takes place in the winter.* Science Issue 11: *Modification of Test Protocol*	

BLM Response(s):

Science Issue 4: The sample collection was designed to capture typical exposures. Avoiding dust would reduce the exposure to trailing riders and the overall risk of asbestos-related disease.

Science Issue 5: With the exception of the SUV exposure sampling, riding was done primarily on trails selected with the input of BLM field rangers and CCMA motorcycle and ATV riders. Road riding was only from the staging areas to the trail access points, which would approximate the routes taken by CCMA users.

Science Issue 6: Refer to Common Responses Section 1C.

Science Issue 7: EPA riders followed the approximate courses for the sampling, considering individual variation for trail conditions. EPA believes that the samples are representative of exposures from riding within CCMA.

Science Issue 8: Refer to Common Responses Section 1D.

Science Issue 9: Refer to Common Responses Section 1B

Science Issue 10: Refer to Common Responses Section 1C.

Science Issue 11: This comment is addressed in the Risk Assessment in Section 4.1.5 on Page 4-6.

Comment: AGENCY LIABILITY - New Agency Health Risk Paradigm	**Recommendation**
In BRC's June 19, 2008 public scoping letter the following suggestions were articulated... "BRC believes BLM should consult with sister land management agencies (e.g. Forest Service, CA State Parks, etc.) regarding mitigation or alternative management strategies such as adding soil or road treatments, public outreach and education, or how they handle similar low risk public health issues or if they even consider the findings in the EPA report as mandating a closure." TORT ISSUE ONE: No Consultation with BLM or Sister Agencies BRC could not find a reference to any consultation in the DEIS regarding how the BLM addresses similar health risk/public access issues in other areas or how sister agencies address such issues. TORT ISSUE TWO: HFO Creates New Legal Paradigm A review the Federal Tort Claims Act, 28 usc §2671-2680, shows that Congress has already addressed this issue regarding agency liability and public access. This act has created the "acted negligently" legal high-bar that all plaintiffs must meet in any court action. This law indemnifies federal agents from civil or criminal action in cases where recreationists have fallen off a cliff while rock-climbing at a National Park, drowning in a federally-managed lake or waterway, or running into livestock or wildlife while the public is driving on a highway through lands managed by BLM or another federal agency, or allowing pregnant women or young children to fish for mercury-laden fish in a federal waterway. Historically federal and state agencies address the aforementioned and similar health hazards in a number of ways. One such tool is the use of signs warning of said dangers. [The DEIS excludes this topic.] The BLM risks creating a new and arbitrary "health risk paradigm" at CCMA that is unwarranted and in fact actually creates a liability for the agency at CCMA and other recreation sites (naturally occurring asbestos is in 43 counties in California) where none has historically existed. Again, Congress has indemnified the agency as long as the land manager informs the public (usually through signing prescriptions and educational outreach) of the health or safety risks. TORT ISSUE THREE: HFO Becomes Health Agency and Assumes Agency Liability	HISTORIC OHV USE – Adopt a True No Action Alternative (NO RISK)— The agency would use this programmatic document to replace the 2005 EAJFONSI EA-CA-190-05-21 that resulted in the now infamous summer or dry-season closure. This would allow historic OHV use on up to 270 miles of routes and 478 acres of barrens/open play areas with no seasonal closures. Permitted OHV events would occur. DEIS NO ACTION ALTERNATIVE (LOW RISK - No agency liability) – This would assume the EPA or 3 party does a review of the RA or preferably undertakes a more valid or realistic study to assess a real health risk to the public. If some risk is identified, the BLM would use the liability protections afforded the agency by the Federal Tort Claims Act and allow for OHV use on up to 270 miles of routes and 478 acres of barrens/open play area. Permitted OHV events would occur. DEIS MODIFIED NO ACTION (LOW

The aforementioned liability discussion logically leads one to call into question the health related tenets of the Purpose and Need (DEIS pages 3/4). The BLM has illogically taken upon itself the role of a health agency and protector of public health rather than a land management agency with a multiple-use mandate. This working postulate of the DEIS is flawed and unnecessarily puts the DEIS and the agency in legal jeopardy if not amended. This nanny-state paradigm is described on page 352 of the DEIS where the HFO takes responsibility for something the agency traditionally and historically has wisely steered away from. This new approach risks creating new agency liability where none has existed. TORT ISSUE FOUR: Failure to Analyze Cumulative Environmental Impact on Other Recreation Sites and Associated Health Risks If the agency is now a health agency, BRC could not find an analysis or substantive discussion in the DEIS of any direct health risk to the OHV public by forcing displaced users (if any of the anti-OHV alternatives are adopted including the preferred alternative) by forcing them to travel longer distances to, and recreate at, at other destination OHV areas including, but not limited to, Jawbone, Hollister Hills and Carnegie SVRAs, Metcalf Cycle Park. The cumulative effects mandate of any NEPA planning document requires at least some analysis of such an issue. A cursory review by BRC - based on public comments at the February 25, 2010 OHMVR Commission meeting — shows the BLM's closure of CCMA (or potential closure in the ROD) is already having a negative impact at other OHV recreation sites not to mention the potential for traffic injuries or fatalities caused by the increased driving distances now being driven by traditional CCMA users. Yet, no such analysis is found in the DEIS.	RISK — Some Agency Liability) — The agency would use some of the use restrictions in Alt. B (wet weather closures, road/campsite mitigations, signing, educational outreach, signed liability release forms) and allow for OHV use on up to 270 miles of routes and 478 acres of barrens/open play areas. Permitted OHV events would occur. DEIS MODIFIED ALTERNATIVE B (LOW/MODERATE RISK. Some Agency Liability) The agency would use the use restrictions in the BRC DEIS MODIFIED NO ACTION ALT, but prohibit riders under the age of 16 and shorten the riding season to the time period between December 1 and April 15, annually. Permitted events would occur with age restrictions.

BLM Response: ISSUES 1 – 3: Refer to Common Response Section 1C and 4E.

Domestic and international health and scientific organizations, including the State of California, the EPA, the Centers for Disease Control, the National Toxicology Program, the National Institute for Occupational Safety and Health (NIOSH), the Occupational Safety and Health Administration (OSHA), the World Health Organization International Agency for Research on Cancer, and the International Program on Chemical Safety, have all classified chrysotile asbestos as a known human carcinogen. While there is some debate within the scientific community regarding

the varying potencies of the different types of asbestos relative to certain cancers, there is no debate that all types of asbestos cause cancer and debilitating and fatal non-cancer disease.

San Benito County abandoned maintenance of CCMA roads in 1994 based specifically on human health risk associated with asbestos exposure. The initial decision to issue an emergency closure order and subsequent planning documents are intentionally designed to allow BLM and other local, state, and federal agencies to analyze a range of alternative management strategies that could be employed at the CCMA "to mitigate risk while still allowing vehicular access and public recreation opportunities".

Results of the numerous activity-based risk assessments in CCMA conducted by BLM, EPA, and OHVMRD are similar and demonstrate that there is an unusually high public health risk from NOA exposure in the 30,000-acre ACEC. BLM has been performing asbestos education and awareness in the CCMA for more than two decades. The range of alternatives in the CCMA Draft RMP/EIS consider a variety of management prescriptions such as signs and public outreach to educate the recreation public about human health risk associated with asbestos. In addition to these activities, BLM's Proposed Plan for CCMA would limit the type and duration of public use that can occur in the ACEC, and would enhance opportunities for public use in the surrounding management zones within the CCMA.

ISSUE 4: Chapter 4, Section 4.1.4 "Impacts to Recreation Common to Alternatives B, C, D, E, F and G; subsection 4.1.4.1 Impacts from Recreation Management Actions" on page 311 of the CCMA Draft RMP/EIS (2009) describes the indirect effects to the OHV public from displaced users recreating at other OHV areas

Indirect impacts would increase as restrictions on allowable uses increase and recreation opportunities decrease across the range of alternatives from A - G, particularly within the Serpentine ACEC. These restrictions would displace thousands of recreationists, who would end up seeking OHV recreation opportunities in other County, State or Federal recreation areas. Most of these other areas are smaller than CCMA and additional visitors would contribute to overcrowded conditions and additional impacts to the human environment in those areas. Overcrowding can lead to increased conflicts among user groups, decreases in recreational quality and experience, and adverse impacts to other resources like vegetative cover, wildlife habitat, soil loss and erosion, and water and air quality.

MSBT-LAW: Moore, Smith, Buxton, Turcke, Chartered

Comment: Public Comment Period	**Recommendation**
We recognize the complexity and sensitivity of BLM's task, and do not question the reasonableness of BLM's multiple delays of the DEIS release, but only ask that BLM extend similar latitude to the public in responding to the DEIS.	We ask BLM to extend the comment period. If the State of California is able to seek independent review of the

Finally, BLM has apparently magnified any procedural gaffe by selectively and informally extending the comment period for certain commenters. Specifically, we believe that BLM has advised the State of California and San Benito County that they may have additional time in submitting formal comments to the DEIS. This result makes no sense and frustrates NEPA's fundamental information purpose, for it presents the possibility, if not likelihood, that some commenters will have a different and more developed record upon which to comment than others.	EPA's or other technical conclusions supporting the DEIS we ask that such information be made available and comment be extended or reopened for at least thirty (30) days following such release.

BLM Response: Section 5.3 of the CCMA Proposed RMP and FEIS provides the following details about the public comment period for the CCMA Draft RMP and EIS. "BLM's official public comment period began December 4, 2009, with the publication of the NOA in the Federal Register (Volume 74, Number 232). The comment period was extended to April 19, 2010 to allow further public input following requests from planning numerous participants and elected officials. While comments are accepted throughout the CCMA land use planning process, BLM only accepted written comments during the public coment period to ensure that issues presented in the CCMA Proposed RMP and Final EIS reflect the genuine concerns of the public. A majority of the public comments were submitted by email; although BLM received many written letters that reflect the interest of numerous agencies and constituents, including those who attended the public comment meetings."

Refer to Common Response Section 1F(iii) regarding California State Parks OHMVRD independent report analyzing naturally occurring asbestos exposures associated with OHV recreation and hiking at Clear Creek.

Comment: Analysis of Technical Issues.	**Recommendation**
The DEIS is obviously premised on the most recent (2008) EPA Risk Assessment. BLM has committed procedural violations in disclosing the EPA methodology and results. The DEIS inadequately discloses the methodology and hard data of the Risk Assessment. These procedural defects condemn the DEIS technical analysis and conclusions.	Further review should occur and any technical materials, including underlying data, should be made fully available for public review and comment

BLM Response: The comment letter from MSBT notes, "When federal agencies evaluate technical issues or apply specialized expertise, NEPA requires them to rely on valid sources and to disclose methodology, present hard data, cite by footnote or other specific method to technical references, and otherwise disclose and document any bases for expert opinion. 40 C.F.R. § 1502.24; Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1150 (9th Cir. 1998)."

By the commenters own admission, it is clear that the BLM's analysis of human health risk in the CCMA Draft RMP/EIS is based on the EPA Asbestos Exposure and Human Health Risk Assessment (2008). The EPA study is incorporated by reference into Chapter 1 under "Purpose and

Need for the CCMA RMP/EIS" and "Relationship to Other Policies, Plans, and Programs". Chapter 3 of the Draft RMP/EIS describes the methodology for the activity-based sampling, and Chapter 4 presents the results of the EPA's risk assessment. Chapter 6 also cites the EPA document in the bibliography.

As such, the CCMA Draft RMP/EIS references to the information in the EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) meet the standards set forth in 40 C.F.R. § 1502.24 because the information is reasonably available to the public; is understandable without undue cross reference; and meets a general standard of reasonableness.

Comment: Technical Conclusions	**Recommendation**
EPA's 2008 findings do not appear against a blank slate, but instead represent a one-time assessment to be compared to multiple other analyses conducted by EPA, BLM, private contractors, and other sources. To belabor the obvious, a finding of meaningful health risk would imply some individual or population level effects manifested through incidence of disease connected to the CCMA. Such connection has never been established and has been persuasively disproven on multiple occasions. The DEIS references a 1992 BLM Human Health Risk Assessment for CCMA, DEIS at 332, but there is no comparative analysis or explanation of that document against the 2008 EPA RA.	We ask that a supplemental analysis be performed.

BLM Response: Refer to Common Response Section 1D and 1F.

Comment: Agency Liability	**Recommendation**
The DEIS reflects an institutional caution apparently focused on the fear of liability from any who might contract disease allegedly connected to recreation activity at the CCMA. Neither the general scenario nor level of risk is new. In fact, the epidemiological risk suggested by EPA's analysis, though excessive, is still less than for many other sites or other causes associated with public lands recreation. There is a well-established body of statutory and common law to address such concerns. As a general principle, a government agency and its employees are well-shielded from potential liability by the discretionary function exception to the Federal Tort Claims Act. Generally stated, an injured party must show that the challenged governmental act or omission violated a mandatory regulation or policy allowing no judgment or choice, and that the governmental conduct was not of the type designed to be shielded by the discretionary function exception. The rare exceptions to the discretionary function exception seemingly arise when the agency, through an explicit policy or	-none-

admission, disclaim discretion otherwise inherent in managing human use of natural areas fraught with worst-case scenarios resulting in possible injury/death. The DEIS reflects a strategy that inexplicably flies in the face of these protections and could be framed as a BLM admission of an environmental risk that history suggests does not exist. We are primarily concerned in these supplemental comments with the issue of the Hollister Field Office's approach to perceived liability issues and the choices made by the HFO to address them. … Indeed, "decisions whether and how to make federal lands safe for visitors require making policy judgments protected by the discretionary function exception" to the Federal Tort Claims act. Rosebush v. United States, 119 F.3d F.3d 438, 443, 6th Cir. 1997). 28 U.S.C. § 2680(a). If a case falls within this statutory exception, known as the discretionary function exception, the district court lacks subject matter jurisdiction. Feyers v. United States, 749 F.2d 1222, 1225 (6th Cir. 1984), cert. denied, 471 U.S. 1125 (1985). The Supreme Court has articulated a two-part test to determine whether a particular claim falls within this exception. Uhited States v. Gaubert, 499 U.S. 315 (1991). The first query is whether the challenged act or omission violated a mandatory regulation or policy that allowed no judgment or choice. Id. at 322-23. If the challenged act or omission is deemed discretionary, the second prong examines whether the conduct is "of the kind that the discretionary function exception was designed to shield." Id. In other words, the more specific the scheme, the less likely it may be that the discretionary function exception applies. So, for example, where agency guidelines did not mandate the specific manner in which campground fire pits would be managed for safety, the failure to warn the public about potential hazards related to fire pits did not constitute an act that gave the district court jurisdiction under the FTCA. Rosebush, 119 F.3d at 442. But here, in addition to establishing goals and objectives, the DEIS also establishes specific management actions that remove that protected discretion. DEIS at 4. There is no mandate to restrict use due to naturally occurring asbestos, but the DEIS undertakes specific mechanisms to do so. All the mitigation and other tools the BLM seeks to implement require specific, intense monitoring and enforcement, and this sets up the agency for liability questions.	

BLM Response: The CCMA Draft RMP and EIS describes the regulatory framework guiding federal agency responses to public health risks from exposure to chrysotile asbestos in Chapter 1 under "Relationship to Other Policies, Plans, and Programs – Comprehensive Environmental Response and Cleanup Liability Act (CERCLA)". In light of this relationship, Chapter 3 describes the history of the Atlas Asbestos Mine Superfund Site and the 1991 Record of Decision that detailed a cleanup remedy for the site and the need for a risk assessment to evaluate the adequacy of the CCMA land use plan for overall protection of human health and the environment (Section 3.2.3.1).

Comment: Cooperating Agency Status for State and Local Governments.	**Recommendation**

In the public scoping report, the HFO states that it will "invite federal, state, and local agencies to participate in development of the CCMA RMP/EIS to provide information and/or technical assistance in evaluating public land resources in the planning area," and identifies several state and local governmental entities to be included. The DIES states that BLM enlisted one cooperating agency (EPA), and "numerous State and local governments, and the Central California Resource Advisory committee . . . ." DEIS (letter to Reader). The DEIS later identifies as a planning criteria "government to government consultation, including Tribal interests," and then states that "[t]he CCMA RMP/EIS will allow BLM the opportunity to review existing agreements and consider cooperative agreements with Federal, State, and local agencies to improve management of public land resources in the Planning Area." DEIS at 14. The HFO, at Section 5.2.5 of the DEIS, describes its "existing agreements with several Federal State, and local agencies to assist in the management of public land resources in the Planning Area." DEIS at 552. The "existing agreements," and the level and nature of participation by the entities listed in that section, are not disclosed in the DEIS. Thus, the DEIS suggests that the HFO has declined to pursue cooperating agency status with respect to this DEIS, instead delaying formal consultation on this particular action to a later time, or, relying on existing agreements that do not identify the manner of those agencies' participation.	-none-

BLM Response: NEPA and its attendant CEQ regulations mandate that federal agencies, in preparing NEPA analyses and documentations "in cooperation with State and local governments," and other agencies with jurisdiction by law or special expertise. 42 USC 4331(a), 4332(2); see also 40 CFR 1501.6. The purpose of these requirements is to benefit the decision-making process by ensuring agency stakeholder involvement, thereby allowing the early disclosure of relevant information, avoiding duplication of federal and other governmental and tribal entities' efforts, and promoting agencies' ability to foster intra-governmental trust. The agency responsible for the NEPA analysis should determine whether any such federal agencies or governmental or tribal entities are interested and capable of participating as a cooperating agency. Even if an invited entity declines participation, it should still be considered for inclusion in interdisciplinary teams engaged in the NEPA process.

Comment: Range of Alternatives	**Recommendation**
Every alternative in the DEIS contemplates further restriction on access to roads and trails and areas by motorized means. It is apparent from the DEIS that the purpose and need for the project is to minimize asbestos exposure and reduce asbestos emissions. DEIS at Executive Summary p. III. Thus, the DEIS accepts as a foregone conclusion that the CCMA is hazardous enough to justify limiting but one factor in exposure, based on questionable science. Thus the purpose and need, from which the range of alternatives flow, illegitimately creates a range of alternatives that precludes meaningful analysis. Every alternative, save the no action alternative, results in significant limitations on motorized recreation access. Thus, the decision-making paradigm is constrained to options that rely on achieving the purpose	-none-

and need through a single means: limiting recreational access. Hazards exist throughout the public lands; not every one can be identified, evaluated, and protected against. Even assuming that the underlying science conclusively demonstrates the conclusion for which it is accepted, a range of alternatives that aims solely to reduce access precludes consideration of legitimate alternative means to achieve the result. In sum, the range of alternatives, and the preferred alternative, derive from an erroneous premise and result in the impossible enterprise of closing areas based on unknown hazards. The DEIS's range of alternatives fails to address reasonable alternative mitigation measures and instead favors closure to achieve its goal. However, numerous alternative mitigation measures exist and have been presented to the HFO; BLM cannot summarily disregard, without analysis, these reasonable alternatives.	

BLM Response: Pursuant to 40 C.F.R. § 1502.14, the BLM's Hollister Field Office conducted multiple public scoping meetings and interdisciplinary team discussions to rigorously explore and objectively evaluate all reasonable alternatives in the CCMA Draft RMP/EIS. Numerous interested parties, including the consortium of OHV organizations and clubs represented by Moore, Smith, Buxton, Turcke, Chartered participated in the public scoping meetings and helped generate the range of alternatives analyzed in the CCMA Draft RMP/EIS.

Furthermore, the comments from MSBT-LAW demonstrate that the BLM was presented with evidence during the scoping process regarding appropriate response, "As noted by BLM's own experts, the common and necessary practice is to improve the monitoring and methodology in order to refine "institutional controls governing when, where, how, and who can ride" in an effort to "reduce risk into the acceptable range and enable limited ORV use at the site." Ford Memo., at p.2, #14." Accordingly, five out of the seven alternatives analyzed in the CCMA Draft RMP/EIS (Alts. A - E) incorporated technical and administrative measures to improve monitoring of meteorological conditions, airborne asbestos emissions, and CCMA visitor use in order to enable limited ORV use at the site.

Comment: Temporary Closure Order	**Recommendation**
40 CFR 1506.1 precludes an agency from taking an action that would have an adverse environmental impact the choice of reasonable alternatives. HFO states in the DEIS that "the closure order will remain in place during the preparation of the CCMA RMP/EIS because this issue is outside the scope of the planning effort and the temporary closure will not affect the RMP development." DEIS at 8. The closure order during the NEPA process, while founded on less-than-conclusive science and thus not independently justified, in fact pre-ordains BLM's ultimate conclusion and therefore does effectively limit the choice of reasonable alternatives. It is obvious, also, that the closure decision, which is itself among the alternatives, appears to "determine subsequent development or limit alternatives." 40 CFR 1506.1 (1)(c)(3).	-none-

BLM Response: Refer to Common Response Section 3A.

Comment: EPA Data and Uncertainty	**Recommendation**
There is unquestionable uncertainty in the EPA's own report regarding the actual conditions; ergo, its sampling, testing, and conclusions do not necessarily correctly characterize the risk. Additionally, throughout the NEPA process for the CCMA RMP, HFO has essentially disregarded, or at least ignored, credible scientific data indicating that PCME fibers are located in concentrated areas, which would allow for a more tailored management approach than is available from the range of alternatives presented in the DEIS. It also is apparent that the EPA report fails to sample according to actual riding patterns. The DEIS fails to address the ambiguity of the data, and therefore, in sum, the DEIS fails to take the requisite "hard look" at the data it accepts as true, thus failing to consider an important aspect of the problem.	-none-

BLM Response: Section 4.2.2 of the CCMA Draft RMP/EIS addresses the Limits and Constraints of the Analysis, including but not limited to Incomplete and Unavailable Information (4.2.2.1), and Exposure and Risk Uncertainties (4.2.2.2).

Comment: Socioeconomic Impact Analysis	**Recommendation**
The DEIS fails to adequately account for the socioeconomic and environmental impacts to other areas or the local economies caused by the alternatives, including the preferred alternative, in violation of NEPA. Socioeconomic impacts are characterized in conclusory terms without specific analysis of data to support the conclusions. See generally, DEIS at 520-23.	-none-

BLM Response: Refer to Common Response Section 4D.

Comment: Climate Change Assumptions	**Recommendation**
The DEIS justifies some of its analysis and conclusions on what it characterizes as the result of climate change. DEIS at 451. However, the DEIS contains insufficient data to support the conclusion that climate change will have the asserted impacts on the CCMA soils and vegetation.	-none-

BLM Response: The DEIS (pg. 451) and CCMA Proposed RMP and FEIS (Section 4.7.1.2.2) state the following wuth regards to climate change. "This analysis assumes that global climate change will make the planning area warmer and drier by the end of the 21st century. However, the body of information and predictive models for climate change is in its infancy regarding prediction of site specific impacts to areas such as the CCMA, and the plan assumes that knowledge will advance quickly with the current emphasis on climate

research and model development. As the RMP is implemented, BLM managers would place a continued emphasis on research, and studies may include components to assess the impacts of changing climate. In the event that climate change made achievement of RMP objectives themselves infeasible, the plan would need to be amended accordingly."

ORG-CA4WDC: California Association of Four Wheel Drive Clubs, Inc.

Comment: No Action Alternative	**Recommendation**
Per the CEQ Forty Questions, (CEQ 40 CFR 1502.14), a no-action alternative must contain the following: "This analysis provides a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives. It is also an example of a reasonable alternative outside the jurisdiction of the agency which must be analyzed. Section 1502.14(c)" . There is little to nothing in this document that qualifies under a no-action alternative because every piece of evidence contained in the document is contaminated by the results of the 2008 EPA study and it's conclusions. All alternatives in the document contain the assumption of risk implied in the EPA report. A true no-action alternative would not be prejudiced by questionable conclusions contained in the aforementioned report. Alternative A, represented in the document as the no-action alternative actually incorporates changes due to the assumption of risk. Therein lies the crux of the problem – there is no true no-action alternative, therefore the document does not comply with CEQ regulations. Please rewrite the document to show a true no-action alternative not tainted by the 2008 EPA study.	Please rewrite the document reflecting a true no-action alternative not prejudiced or biased against motorized access to the CCMA because of the 2008 EPA study.

BLM Response: Refer to Common Response Section 3B.

Comment: R.S. 2477	**Recommendation**
Per Congressionally enacted Revised Statute 2477, the public has a right of access of roads and highways to facilitate their right-of-way. This document presents various scenarios that would inhibit the right of the public to travel over previously designated public and county roads and highways, in opposition to all rights and privileges granted to members of the public. The BLM has no right to impede or restrict access over and or all the roads and highways mentioned in the DRMP/EIS, and the document must be rewritten to reflect this fact	-none-

BLM Response: Refer to Common Response Section 1E.

Comment: No Evidence of Actual Harm	**Recommendation**
Under every statute of law, evidence is a primary need to establish and prove a legal case. But since neither agency pursued on-the-ground, concrete evidence of the health risk, we must conclude that no evidence actually exists that directly links recreating at the Clear Creek Management Area with any increased health risk for the over 50 years+ of recreation activity in the area. We reject these supposed findings outright because they present no true information, only excuses why critical information is missing. Unless and until epidemiological studies definitely prove a risk that is beyond a supposition, the Clear Creek Management Area must be reopened to motorized recreational use. Please strike form the document all reference to health risk until such time as the appropriate epidemiological studies are conducted and prove any other than the current evidence shows – that there is no risk for motorized recreation in the Clear Creek Management Area.	-none-

BLM Response: Refer to Common Response Section 1F(i).

Comment: Recreation Use Scenarios	**Recommendation**
We contend that the typical activity as measured in the DRMP/EIS is actually atypical activity for the Clear Creek Management Area in regards to motorized recreation. For many years motorcycle enthusiasts and 4WD enthusiasts have taken air samples as part of the regular activities during events. And yet these air samples have never indicated any health risk, motorized recreational activity was never stopped because of dangerous levels, nor were any closures issued because of evidence gathered during these activities. We would conclude that these air sample represent the true “typical” activity for motorcycle use in CCMA because these samples were gathered by the riders themselves. Contrast the methodology during the EPA study and you will find evidence in the document of riders of unproven ability and experience riding, in an atypical manner either too closely to one another, or off designated trails, or in exclusively lower elevations. Also, is the question of the moisture in the soil present during the air sampling. Also evident in the photo are blade marks made from 'dragging' the route prior to the EPA riders measuring the dust in the air. This is not typical of off-road recreation, which enjoys and treasures the idiosyncrasies of the bumps and dips present on an off-road trail. Therefore, this leads us to question why the road was dragged prior to the testing done by the EPA, as this would most assuredly lead to increased dust particles in the air, and alter the testing results.	-none-

BLM Response: Refer to Common Response Section 1C.

Comment: Risk Assessment Data	**Recommendation**
Any and all conclusions based on data collected during the time of the dry season closure must be removed from the DRMP/EIS. The fact that data from the period of the dry season closure was used in the document is a fatal flaw for the document – because there is no alternative that proposes allowing riding during that time period. Only data that is relevant to the alternatives presented in the DRMP/EIS can be included in the document, and all other data must be removed. This includes any reference to dry season riding, all data collected during dry season riding, and all conclusions derived from data collected during this time. All data referred to in the document, and/or conclusions derived from such, are outside the scope of the document, i.e. data during a dry season closure (closure being the operative word).	-none-

BLM Response: Refer to Common Response Section 1C.

Comment: 2001 BLM National Travel Management Direction	**Recommendation**
Strictly looking at the evidence that present itself in the DRMP/EIS, it is clear that the Hollister Field Office has purposely excluded one specific form of motorized recreation; motorcycle riding. This is in opposition to the 2001 BLM National Travel Management Direction because it restricts use by vehicle type. The Purpose and Need clearly states on page 2 the need to; "The CCMA RMP shall guide the management of the lands and resources administered by the Hollister Field Office in CCMA to achieve the following:.... 3)designate areas in CCMA for motorized, mechanized, and non-motorized/non-mechanized recreation opportunities;". But the preferred alternative does not allow for motorcycle riding at all. Therefore the BLM has not adhered to it's Purpose and Need, and the DRMP/EIS is fatally flawed, and a supplemental DRMP/EIS must be issued. The DRMP/EIS provides little, if any, explanation why motorcycle riding has been excluded from the preferred alternative. Per the aforementioned 2001 direction, BLM policy does not allow for restriction by vehicle type, and the direction is clear in the non-discrimination between types of off-road vehicles, or uses for off-road vehicles (36 CFR 8340.0-5). The preferred alternative clearly excluding motorcycle riding represents a new policy direction that the Hollister Field Office is not entitled to establish.	-none-

BLM Response: BLM's authority to regulate off-road vehicle use on public lands is promulgated by 43 CFR 8340. Pursuant to Sec. 8340.0-5. Definitions. As used in this part, include the following (underline added for emphasis):

(f) Open area means an area where all types of vehicle use is permitted at all times, anywhere in the area subject to the operating regulations and vehicle standards set forth in subparts 8341 and 8342 of this title.

(g) Limited area means an area restricted at certain times, in certain areas, and/or to certain vehicular use. These restrictions may be of any type, but can generally be accommodated within the following type of categories: Numbers of vehicles; types of vehicles; time or season of vehicle use; permitted or licensed use only; use on existing roads and trails; use on designated roads and trails; and other restrictions.

(h) Closed area means an area where off-road vehicle use is prohibited. Use of off-road vehicles in closed areas may be allowed for certain reasons; however, such use shall be made only with the approval of the authorized officer.

Please refer to Common Response Section 3D. The Proposed Action analyzed in this PRMP/FEIS includes 32 miles of designated routes in the Serpenetine ACEC that would be limited to highway-licensed vehicles, including dual sport motorcycles.

Comment: Best Available Science	**Recommendation**
The latest and best science is not used in the 2008 EPA report, therefore the BLM must not use that study as the basis of a management plan. Other scientific evidence, by the BLM's own admission, was not used or considered by the BLM. All scientific conclusions are subject to peer review, and yet the BLM took this EPA study as outright fact, without conducting due diligence. Progressing from the fact that the best possible science was not used, is that fact that the DRMP/EIS was developed with alternatives that are unfairly restricted, contrary to CEQ regulations. From one misstep to another, this BLM prepared document represented a series off-ill-conceived calculates in an attempt to conduct a true scientific analysis. This is in direct opposition to the Data Quality Act, and the BLM's own internal guidelines to adhere to that Congressionally passed legislation. Please remand this document, and redo the RMP to include both the best possible science, and comply with all aspects of the Data Quality Act.	-none-

BLM Response: Refer to Common Response Section 1F(ii).

Comment: Inadequate Impact Analysis	**Recommendation**
The DRMP/EIS fails to evaluate the need for motorized recreation counter to visitor needs. In the Purpose and Need of the DRMP/EIS clearly sites; "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.", but then reversed the need indicated in this sentence to present a preferred alternative that does not correspond to the " ...increased demand for use of public lands for recreation...".It then follows, that the preferred alternative does not adhere to the Purpose and Need as stated in the DRMP/EIS, and therefore should not be the designated as the "Preferred Alternative" since it decreases access for public lands for recreation. Public scoping information is also clearly listed in the document, and indicates a very clear need for increased motorized recreation opportunities. So this document does not flow from scoping. The Social and Economic meeting held on February 22, 2010 in Hollister clearly indicated the need from the local areas greatly affected by the closure for a reopening of the Clear Creek Management Area.	-none-

BLM Response: Refer to Common Response Section 2C and 3A.

Comment: Asbestos Terminology	**Recommendation**
Much of the terminology used in the document is mistaken and inappropriate. The Purpose and Need of the document, which should represent a clear plan of what the agency hopes to accomplish, is misleading in this DRMP/EIS. Quoting from the document, the purpose is to: " 1) Minimize Asbestos exposure 2) minimize asbestos emissions....". No less than the Unites States Geological Survey defines asbestos as; ..."Asbestos is a commercial-industrial term with a long history, and is not a mineralogical definition". As the discussion in this document does not refer to a industrial setting, but rather a natural setting, all references to "asbestos" in this article must be removed and replaced with more accurate terminology. The discussion at the forefront for this document is Serpentine rock, which contains the mineral chrysotile.	-none-

BLM Response: Refer to Common Responses 1A.

Comment: Cumulative Effects	**Recommendation**
Any or all of the [cumulative] effects of closing the Clear Creek Management Area are not evaluated by the DRMP/EIS. Besides the economic effects on local businesses in the affected	It is a well-known axiom that every action has an equal and opposite reaction. The reaction to

areas, including Coalinga, King City and Hollister, there are the effects of travel for recreational opportunities to other areas, and impacts their facilities, whether it be State and County owned, such as the Hollister Hills SVRA, or Metcalf Motorcycle Park in Santa Clara County.	the closure of Clear Creek Management Area has to be evaluated in order for this DRMP/EIS to be compliant with CEQ regulations.

BLM Response: Refer to Common Response Section 4D & 4E.

ORG-CERA: California Enduro Riders Association

Comment: Children's Exposure Scenarios	**Recommendation**
The risk characterizations for child exposures has two major flaws: 1. The risk assessment doesn't take into consideration the smaller lung capacity of the child. 2. The risk assessment doesn't take into consideration that a child would not ride the same length of time or distance that an adult would.	All portions of the Draft RMP!EIS that refer to a child's potential health hazard due to potential exposure to chrysotile must be removed or corrected with factual and documented data before the decision is made on the Final ROD/RMP/EIS. All portions of the Draft RMP/EIS that include age restrictions must be removed or substantiated with factual and documented data before the decision is made on the Final ROD/RMP/E1S.

BLM Response: Refer to Common Response Section 1C.

Comment: Waivers of Liability	**Recommendation**
The following three sections of the Draft RMP/EIS, while written differently, state that signed waivers would reduce risk to public health and safety and/or minimize exposure to hazardous materials and airborne asbestos fibers. [DEIS Page 41: HAZ-BG4. DEIS page 86: IIAZ-BG4. DEIS page 351: 4.2.6.2 Mitigation] This is not true. They would not mitigate exposure to hazardous materials and airborne asbestos fibers. They are not part of a HAZARD program. They are part of a legal program. A signed waiver would be to indemnify BLM against risk of tort claims. [Page 352: Waivers of Liability and Indemnification of Risk] confirms the problem of relating a waiver of liability to reducing risk to public health and safety and/or minimizing exposure to hazardous materials and airborne asbestos fibers.	A statement for the reason of inclusion of a Waiver of Liability must be included in each of the Alternatives that contain a Waiver of Liability. Statements referring to waivers of liability as mitigation for the risk to public health and safety and/or to minimize exposure to hazardous materials and airborne asbestos fibers must be deleted from the Draft RMP/E1S and not

[Additionally] All of the Alternatives except "A" include a Waiver of Liability. While the Waiver of Liability would have no beneficial impact on public health and safety, there must be a reason that the BLM included it in the Alternatives. That reason has not been stated in the DEIS.	included in the Final RMP/EIS and ROD.

BLM Response: As noted in section 4.2.6.2 of the CCMA Draft RMP/EIS and section 4.2.4.1 of this PRMP/FEIS, "During public scoping, authorization of access into the Serpentine ACEC based on signed waivers of liability (i.e. indemnification of risk), was identified as a potential mitigation measure to inform visitors of the health risk associated with exposure to asbestos to determine their own willingness to accept the risk of exposure to asbestos in CCMA. In other words, this measure would allow individuals to "ride at their own risk", and reflects the preferred approach identified by the majority of the public scoping comments. However, developing a waiver of liability, or establishing indemnification of risk, would have no beneficial impacts on public health and safety because neither approach would actually reduce exposure to airborne asbestos or improve overall protection of human health and the environment."

HAZ-BG4 says BLM would "Require signed waivers of liability to indemnify BLM against risk of tort claims associated with CCMA visitor use and exposure to airborne asbestos fibers", and explains that supplementary rules would be implemented based on the overall effectiveness of mitigation measures. However, the Proposed Action analyzed in this PRMP/FEIS does not include waivers of liability as a public health and safety mitigation measure because it was determined to be ineffective, consistent with comments from CERA.

Comment: Visitor Use Scenarios	**Recommendation**
Some statements, assumptions, and conclusions in the Draft RMP/EIS rely on unsubstantiated visitor statistics from the EPA CLEAR CREEK MANAGEMENT AREA ASBESTOS EXPOSURE AND HUMAN HEALTH RISK ASSESSMENT. The EPA's recreation use data for CCMA visitors relies on the 1992 PTI HRA. The assumptions made in the 1992 PTI HRA are arbitrary and capricious and cannot be relied upon by the EPA. Furthermore, the decisions made within the Draft RMP/EIS pertaining to the visitors should not use the information contained in the EPA assessment.	All entries in the Draft MP/EIS that were derived from the EPA's Health Risk Assessment about the visitors to the CCMA must be removed and not used in the final ROD and EIS.

BLM Response: Refer to Common Response Section 1C.

Comment: Rockhounding	**Recommendation**
1. Within the Draft RMP/EIS there are 27 instances of the action rock hounding. This action has not been defined in the Draft RMP/E1S. A definition is important to show what would or would not be allowed in any of the Alternatives and/or the Final EIS and Rod. A definition is also needed so that proper testing for potential asbestos exposure	1. A definition of rock hounding must be added to the Draft and Final RMP/EIS and ROD. 2. Rock hounding must be changed to separate

levels can be done. 2. The action of rock hounding can disturb the soil and puts the person closer to the soil. This action cannot be equated with hiking or hunting. There was no testing by the EPA to show the potential asbestos exposure level for this recreational activity, therefore, no conclusions about the potential asbestos exposure can be made. The Draft RMP/EIS has failed to present any analysis of the action of rock hounding.	entries in the Draft and Final RMP/EIS and ROD and not grouped with hiking and hunting. 3. Air sampling and analysis while rock hounding must be performed to establish its potential health hazard before any conclusions can be entered into the Draft and Final RMP/EIS and ROD.

BLM Response: The CCMA Draft RMP/EIS characterizes hobby gem and mineral collection (i.e. rockhounding) in section 3.1.4.1 (pg. 133).Refer to Common Response Section 1C.

Comment: Preferred Alternative.	**Recommendation**
Alt E eliminates all motorized recreational use outside of the ACEC and all OHV use in the ACEC. Selection of Alt. E would not fulfill the requirements of 43 CFR 2410.1.	To comply with 43 CFR 2410.1, an alternative that allows recreational OHV use must be selected.

BLM Response: There is no specific requirement to authorize motorized recreation in the referenced regulations. Pursuant to 43 CFR 2410. 1, BLM has taken all present and potential uses and users of the lands into consideration in the CCMA Draft RMP/EIS. Refer to Common Response Section 3A. This PRMP/FEIS also analyzes a range of alternative land use decisions to reduce public health risks to acceptable levels while achieving "maximum future uses and minimum disturbance to or dislocation of existing users."

Comment: Planning Criteria	**Recommendation**
There are two (2) PROBLEMS with the following [Planning Criteria: Page 10] Consider the extent to which the revised plan reduces accelerated erosion and offsite transport of asbestos fibers on vehicles and clothes due to off-highway vehicle use. Problem 1: Erosion and offsite transport of asbestos fibers are two totally unrelated potential problems. Problem 2: There is no proof provided in the Draft RMP/EIS to show that asbestos fibers from the CCMA are being transported offsite on vehicles due to off-highway use.	1. Erosion and offsite transport of asbestos fibers must be listed separately in the planning criteria. 2. In the Planning Criteria of the Draft RMP/EIS, it must state that there is no verified data to support the claim that asbestos fibers from the CCMA are being transported offsite from the CCMA. The Draft RMP/EIS must state that there is no verified data to show a need for a public wash station.

BLM Response: Section 4.2.2 of the CCMA Draft RMP/EIS and this PRMP/FEIS contains the following statement:

BLM was unable to quantify reductions in human health risk and asbestos emissions from implementation of mitigation measures because reliable data on the effectiveness of surface hardening techniques or dust suppression on roads in CCMA cannot be obtained because of cost and feasibility issues. Therefore, BLM's evaluation of such impacts is based upon theoretical approaches or research methods discussed in the EPA's risk assessment and this RMP/EIS that are generally accepted in the scientific community.

Section 4.2.2.4 of the CCMA Draft RMP/EIS and this PRMP/FEIS also states:

Many of the other mitigation measures considered in the range of alternatives and the Proposed Action for the CCMA PRMP/FEIS are also limited to qualitative analysis because there is no information available on the effectiveness of such measures as restricting annual visitor use days/year, vehicle types, installing vehicle wash racks, enforcement of speed limits, indemnification of risk, and other administrative actions in reducing exposure to asbestos emissions in CCMA.

Comment: Motorized Vehicle Use Conflicts.	**Recommendation**
Pages 359, 360, 362, 364, 365, 366, 368, 369, and 370 of the Draft RMPIEIS do not contain any documented evidence of conflicts between motorized vehicles and other forms of recreation	The contents in the section of Motorized Vehicle Use Conflicts on all pages listed above must be removed if documented evidence of conflicts between motorized vehicles and other forms of recreation cannot be established. The Hollister office of the BLM must also address as a mitigation possibility, restrictions on non-motorized recreation.

BLM Response: The types of user conflicts decribed in section 4.1.2.1 of the CCMA Draft RMP/EIS and this PRMP/FEIS have been documented by BLM. Although these situations are often defined as "user conflicts", there generally is no physical or safety conflict associated with one party encountering another party on the trail. These situations could also be described as impacts of motorized use on private landowners or non-motorized user groups experience of the public lands. The CCMA Draft RMP/EIS and this PRMP/FEIS also consider restrictions on non-motorized recreation to reduce human health risks associated with exposure to naturally occurring asbestos in the Serpentine ACEC.

Comment: Hunting	**Recommendation**
There are 119 instances of the word hunting in the Draft RMP/EIS. There can be many opinions of what constitutes hunting and its application within the Draft RMP/EIS. For some, it is the quest to take game animals. For others, it could be trying to locate an object or place as in geocaching. For the taking of game animals, it could entail either total foot traffic or the scouting of an area by motorized travel. Deer and wild boar have been the main mammals that have been hunted within the CCMA. I have heard that Elk have also moved into the area. Upon a successful hunt, retrieval of any of these mammals would be very difficult without motorized access. It would be a shame to leave a carcass behind because the successful hunter was unable to retrieve it.	The word hunting must be defined in the Draft RMP/EIS to clarify the activities allowed or restricted in the Alternatives and final EIS and ROD.

BLM Response: The CCMA Draft RMP/EIS characterizes hunting in section 3.1.4.1 (pg. 134).

Comment: Cumulative Effects	**Recommendation**
Section 4.2.9 Cumulative Effects, has nothing to do with cumulative effects. This section is a dissertation on pneumoconiosis and contains no connection with cumulative effects.	The contents of Section 4.2.9 must be totally removed before any consideration for the final RMP/EIS/ROD.

BLM Response: Refer to Common Response Section 4E.

Comment: Scarcity of OHV Opportunities	**Recommendation**
The scarcity of public OHV recreational land was not given adequate consideration in the development of the preferred alternative. According to (43US.C.]712(c,)(6,),, it is the responsibility of the Hollister office of the BLM to give adequate consideration to replacement of lost OHV recreational opportunity. The Draft RMP/EIS states that approximately 80% of the visitors to the CCMA are there for 01-TV recreation. The Hollister office of the BLM has the only public lands within 100 miles of the CCMA available for OHV recreation. The emergency closure of the CCMA has impacted the ability of Hollister Hills SVRA to provide OHV recreational opportunity to all that wish to go there. The preferred alternative does not replace ANY of the lost OHV recreational opportunity that would occur if that alternative were enacted. There are no statements within the Draft RMP/EIS explaining why recreational OHV opportunity that would be lost from the prohibition of recreational OHVs from the ACEC could not be replaced on other areas within the CCMA.	Statements must be included in the Draft RMP/EIS that: 1. Show the amount of recreational OHV opportunity that is available within 100 miles of the CCMA and the impact that each of the alternatives will have on that opportunity. 2. Explain why recreational OHV opportunity in any part of the CCMA was not included in the preferred alternative, or add to the preferred alternative an amount of recreational OHV opportunity similar to what would be lost from the proposed restrictions within the ACEC.

BLM Response: Refer to Common Response Section 3D and 4B.

Comment: Serpentine ACEC Boundary	**Recommendation**
A legal boundary for the CCMA Serpentine ACEC does not exist. In the 1999 CCMA ROD, one of the items to be completed after the signing of the ROD was to formalize the boundaries of the ACEC.	All entries, references to, or decisions made by use of the boundaries of the Serpentine ACEC must be removed from the Draft

The declaration of new boundaries was never entered into the Federal Register. Notification in the Federal Register is a requirement to legally describe the boundaries. With no legally binding boundaries, all entries concerning the Serpentine ACEC in the CCMA Draft RMP/E1S have no substance. Legal boundaries are necessary to denote where and what type of activities can take place within the CCMA.	ROD/FEIS as they must be considered as arbitrary, capricious, and have no legal standing. All entries, references to, or decisions made by use of the boundaries of the Serpentine ACEC must he removed from consideration when the Final EIS and ROD are produced.

BLM Response: Section 1.3.2.3 of the CCMA Draft RMP/EIS and this PRMP/FEIS explain that changes or modifications to special designations in CCMA will not be considered in the range of alternatives for the CCMA RMP/EIS. The designation of the Serpentine ACEC in the 1984 Hollister RMP (as amended) is based on human health risks associated with exposure to asbestos within the serpentine soils. The boundaries of the ACEC were defined by mapping of asbestos soils derived from the New Idria serpentine formation. The Federal Register notice of availablity published for the Hollister RMP (1984) and the 2006 Record of Decision (ROD) for CCMA RMP Amendment and Route Designation satisfied legal requirements for establishment of the current ACEC boundary.

ORG-CFMS: California Federation of Mineralogical Societies

Comment: Comments submitted by individual members and mineralogical societies.	**Recommendation**
Refer to rockhounding organizations and individuals comments.	-none-

BLM Response: Thank you.

ORG-CMDA: California Motor Dealers Association

Comment:	**Recommendation**
On behalf CA over 200 franchised and authorized California motorcycle and motorsport dealers. I respectfully ask you to reopen the Clear Creek Management Area to motorized recreational use. This abrupt (and continuing) closure, although it may have been well-intentioned, did not take into account the devastating financial impact on motorcycle and all terrain vehicle (ATV) dealers, in the direct and feeder areas of California, to Clear Creek. Our Members, undoubtedly, will be advising you of their individual cases of how significantly this closure has affected their businesses, and I will give you an overview of its impact on the industry. Motorcycle retailing is suffering through the most serious challenge that we have ever experienced because of the deepest national recession since the Great Depression.	-none-

The Clear Creek closure exacerbates that effect, since many CMDA Member dealerships depend on their customers' income from the use of this decades-old, excellent OHV riding area CMDA Members include direct, and feeder, OHV businesses from Bakersfield, Berkeley, Concord, Daly City, Fowler, Fremont, Fresno, Gilroy, Goleta, Hayward, Hollister, Lemoore, Livermore, Lompoc, Manteca, Merced, Modesto, Morgan Hill, Monterey. Mountain View, Oakland, Oakley, Paso Robles. Redwood City, Salinas, San Francisco, San Mateo, San Jose, San Rafael, Santa Clara, Santa Maria, Sonora, Stockton. Sunnyvale, Tulare, Visalia and Walnut Creek. On behalf of these dealers directly impacted by the closure, we respectFully urge the BLM to appmve Alternative 1. To justify that Alternative choice, please do more extensive air sampling, which is likely to demonstrate that the health hazards are much less significant than your limited study indicates.	

BLM Response: Refer to Common Response Section 4D and 1F(iii).

ORG-CNPS: California Native Plant Society

Comment: General	**Recommendation**
The DRMP/DEIS document is unnecessarily complicated and too long for the general public to assimilate and begin to provide germane comments. This is very unfortunate because we believe it excludes many individuals who appreciate the CCMA AND the surrounding 'management zones' and would otherwise be able to provide comments.	-none-

BLM Response: Refer to Common Response Section 1G.

Comment: Land Tenure Adjustments and New OHV Areas	**Recommendation**
All of the surrounding 'management zones' that the Hollister BLM interdisciplinary staff designated for this document have many sensitive, rare plant and animal species and communities. Decisions to "dispose" and/or develop trail networks/roads on these public lands is incongruous with conserving and protecting the sensitive natural resources that occur therein. We strongly oppose development of any new OHV recreation areas by the Hollister BLM Field Office for energy consumptive, destructive recreation for the following reasons: 1. Inadequate funding for additional law enforcement, ranger patrols, restoration and rare species monitoring at the CCMA or any of the proposed 'new areas'; 2. The southern Diablo Mountains are geologically and biologically diverse. These Public lands are highly sensitive and should be protected, not exploited.	-none-

Retain the lands identified in the DRMP/DEIS in the Tucker, Condon and San Benito River management zones.	

BLM Response: Refer to Common Response Section 3D and Section 1.9 of this PRMP/FEIS.

Comment: Planning Area	**Recommendation**
The description of the planning area (1.2) neglects to include "high number of sensitive plant and animal species," and also omits incense cedar from the "unique forest assemblage."	-none-

BLM Response: The "high number of sensitive plant and animal species" is discussed in detail throughout section 3.6 of the CCMA Draft RMP/EIS and this PRMP/FEIS. Incense cedar is included in the detailed description of vegetation in section 3.4 of the CCMA Draft RMP/EIS and this PRMP/FEIS.

ORG-CORVA: California Off-Road Vehicle Association

Comment: Rationale for Vehicle Use Limits	**Recommendation**
Motorcycles, whether highway licensed or green sticker registered, are excluded from the entire CCMA in Alternative E and allowed only outside the ACEC in Alternative D. Full sized 4X4 vehicles are allowed on a permit only basis within the ACEC in Alternatives D and E. ATV/UTV use only is allowed in areas adjacent to the ACEC in alternative E. The draft RMP-EIS provides no explanation for the exclusion of motorcycle use from the CCMA in these alternatives. There is no mention of how motorcycles might negatively affect cultural or natural resources or be a source of conflict that would prelude their use within the CCMA. The primary concern appears to be the potential for negative effects on human health and safety that would apply to all vehicles, not just motorcycles, according to the EPA study cited in the draft RMP-EIS. The 2008 EPA study provides little if any basis for allowing one form of vehicle use while excluding others. This indicates that there is no clear rationale described in this document for restricting use by vehicle type and that in fact that all vehicle types result in some level of asbestos exposure.	2. Alternatives that allow the use of full sized 4X4 vehicles in the ACEC and exclude other motorized vehicles must be revised to either exclude all vehicles from the ACEC or allow limited use of the area by all vehicles.

BLM Response: Refer to Common Response Section 3D.

Comment: Alternative D	**Recommendation**
The draft RMP-EIS does not provide adequate discussion of Alternative D that would allow a reasoned choice	The draft RMP-EIS raises

between alternatives. The draft RMP-EIS must be revised to include an adequate discussion of the issues related to Alternative. In Table 2.6-14, the document makes an apparently contradictory statement regarding potential public access to the Tucker, Condon and San Benito River areas. "Under Alternative D, none of the 3,300 acres in the Tucker, Condon, and San Benito River zones would be available for disposal. Retention of these lands would have minor adverse impacts on management efficiency and public access because all of these parcels have no existing (or reasonably foreseeable) public access. Otherwise, Alternatives E and F would have the same effects as Alternatives B and C." The analysis provided in the draft RMP-EIS is inadequate because Alternative D is not given fair and thorough discussion and is not established as a reasonable and viable alternative. The draft RMP EIS cites a previous study of the Cantua area but provides only the most limited discussion of the results of the study and how they might apply to motorized recreation in the adjacent CCMA. The Martin Ranch SVRA Feasibility study indicates that this is a potentially viable area for an SVRA. This study area includes BLM lands that are proposed for purchase or exchange with the intent of developing an OHV area to provide opportunity for the Central Valley. According to this study there is the potential for an OHV area outside the Clear Creek ACEC, and that the elimination of impacts due to grazing in this area would more than offset those that would be expected from OHV use. Furthermore, this area could be developed without including asbestos bearing deposits within the SVRA boundary. To summarize, the draft RMP-EIS provides contradictory statements related to the availability of public access to the Condon Peak and Cantua zones and little if any information about possible public access to the Tucker Mountain zone. The maps provided indicate that two alternatives, D and E, include development of recreation sites in the Condon and Cantua zones and that public access from New Idria Road and Los Gatos Road is planned for these areas. But there is no discussion of why recreational opportunity for off highway vehicles should be included or excluded for these areas. This is a key element of alternative D, yet any discussion of this element is lacking.	the issue of potentially asbestos bearing deposits in the Condon and Cantua areas. There is no discussion of the Tucker Mountain area. The draft RMP-EIS provides no information to support this statement such as soil survey results or GIS surveys. The Martin Ranch SVRA Acquisition study in fact indicates that asbestos areas were identified and could potentially be excluded from the planned SVRA. This statement appears to be a matter of opinion and purely speculative. The document should either provide supporting information for this statement or remove this statement from the draft RMP-EIS.

BLM Response: Refer to Common Response Section 3C.

ORG-CBD: Center for Biological Diversity

Comment: General Comments	Recommendation
Instead of an actual draft management plan (and associated EIS), very little baseline conditions and management guidance are actually identified or evaluated in the DRMP/DEIS. The document fails to identify any qualitative or quantitative desired condition criteria for the resources, and instead reads primarily as a single issue off-road vehicle plan with five of seven alternatives incorporating ORV use, despite the fact that the CCMA Asbestos Exposure and Human Health Risk Assessment (Risk Assessment) indicates that all activities except day-use hiking significantly disturbed soils and increased the risk of airborne asbestos. In fact the Risk Assessment states that "Motorcycle riding, ATV riding, and SUV driving/riding had the highest exposure concentrations, in some cases exceeding even the U.S. Occupational Safety and Health Administration (OSHA) 30-minute Excursion Limit for asbestos. Only hiking was near ambient asbestos concentrations." (Risk Assessment at pg. ES-2). While one of the goals of the management plan is to "Restore, maintain or improve ecological conditions, natural diversity, and associated watersheds of high value, high-risk, native plant communities and unique plant assemblages", the document fails to identify 1) which ecological conditions, natural diversity, communities and assemblages will actually be evaluated (all of the 50 plant alliances? Wildlife habitat values?), 2) how they will be monitored (no methodologies or guidance is given), or 3) when and how often they will be monitored (with the exception of the Camissonia benitensis [CABE] monitoring plan which lays out monitoring protocols). Importantly criteria for the desired condition are not identified (including the CABE Compliance Monitoring & Adaptive Management Plan). While the DRMP/DEIS notes that the 1984 Hollister RMP provides goals and objectives, it also states that "the 1984 Hollister RMP and CCMA RMP Amendments (1986, 1999, 2006) lack detailed direction and are generally outdated" (DRMP/DEIS at pg. I). This DRMP/DEIS is the appropriate place to identify these essential metrics including the CABE Compliance Monitoring & Adaptive Management Plan. Triggers for action if monitoring indicates deterioration of the ecological conditions, natural diversity, watershed condition, native plant communities or unique plant assemblages are also not included. Monitoring strategies and triggers for action must be included in the DRMP/DEIS in order to be able to evaluate the conditions of the CCMA, detect change and implement strategies to properly address those changes including adaptive management strategies (which again are not addressed in the DRMP/DEIS). Because the DRMP/DEIS fails to include these important components, it currently fails to meet the legal requirements ofFLPMA 43 U.S.C. § 1732(b), 1 732(d)(2)(a). The DRMP/DEIS lacks important and consequential consistency throughout the document. For example, SSS-BC 1 (at pg.55) is identified as "Maintain all known special status species habitat", while SSS-BC1 (at pg. 439) is identified as	-none-

"prohibiting collection of SSS". These are two very different issues relating to special status species and the intent of this measure is not clarified elsewhere.	

BLM Response: Chapter 3 describes baseline conditions. Current management guidance is identified and evaluated under the No Action alternative in the DRMP/DEIS. Desired condition criteria for the resources are identified and evaluated under the range of alternative in the CCMA Draft RMP/EIS and this PRMP/FEIS. Appendix III and Appendix IV of these documents also include the San Benito Mountain RNA Management Plan and CABE Compliance Monitoring & Adaptive Management Plan, which provide additonal details about the ecological conditions that would be monitored and triggers for action if monitoring indicates deterioration of the ecological conditions.

SSS-BC1 (maintain all known special status species habitat) and SSS-BC2 (prohibiting collection of SSS) were inadvertently switched in Table 4.6-25 in the CCMA Draft RMP/EIS. BLM corrected Table 4.6-25 in the PRMP/FEIS to provide consistency.

Comment: Plant Monitoring	**Recommendation**
While we unequivocally support the monitoring of Camissonia benitensis (CABE), the DRMP/DEIS fails to present any monitoring strategies for the rest of the rare plants and vegetation alliances. No desired condition criteria are proposed and no triggers for action included.	Clearly these components are basic standards in all resource management plans, and need to be included here.

BLM Response: See response to comment above.

Comment: Wildlife Protection Measures	**Recommendation**
In general, the management decisions in alternative F and G would lead to much greater protection and recovery of special status species than the decisions in any other alternative and the thus the BLM should adopt alternative F or G with some qualifications. Some of the management actions are still not based on the most recent and best available science. For example SSS-BC4 (at pg. 55) states "Avoid disturbance, including road construction and recreation activities, within a 0.25-mile radius around nesting sites of the California condor, bald eagle, and prairie falcons". This generalized and inaccurate measure is flawed based on unique species specific requirements. It also leaves out golden eagles which are known to or are identified to have potential to occur in the project area (DRMP/DEIS at Table 3.6-7). For example, the Recovery Plan for the California condor (USFWS 1996) specifically recommends "human disturbance should be restricted within 1.6 km (1 mi) of active nest sites". In addition, the DRMP/DEIS fails to address all of the conservation measures necessary to adequately protect species including the California condor. For example, the document	The appropriate issues and data should be incorporated into the DRMP/DEIS.

fails to address other California condor conservation requirements including the recommendation for protection of roosting sites from the Recovery Plan "California condors apparently will tolerate more disturbance at a roost than at a nest. Roosting sites and nesting sites are susceptible to similar disturbance threats, and their preservation requires isolation from human intrusion". Despite the DRMP/DEIS acknowledgment that "California condors and bald eagles are expected to increase in frequency of sightings as their populations recover from historical declines" (DRMP/DEIS at pg. 187), appropriate conservation is not identified. Regardless of distance, a straightline view of disturbance affects raptors, and an effective approach to mitigate impacts of disturbance for golden eagles (and other raptors) involve calculation of viewsheds using a threedimensional GIS tool and development of buffers based on line of site (Camp et al. 1997; Richardson and Miller 1997). The DRMP/DEIS must carefully re-evaluate (or in the above cases accurately evaluate) the proposed management actions for all of the rare species on the CCMA. Another example is with regards to vernal pool and the rare species that inhabit them. The document makes reference to "A recovery plan, Vernal Pools of Northern California, is under development". (DRMP/DEIS at pg. 184). We bring to your attention the Vernal Pool Recovery Plan - Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon issued by the U.S. Fish and Wildlife Service in 2008.	

BLM Response: In order to be consistent with the Recovery Plan for the California condor (USFWS 1996), SSS-BC4 has been edited to read "Avoid disturbance, including road construction and recreation activities, within a one-mile radius around nesting sites of the California condor, eagles, and prairie falcons." The reference to the vernal species recovery plan has also been edited in this PRMP/FEIS.

Comment: Land Tenure Adjustments	**Recommendation**
The Center generally opposes any land disposal and the DRMP/DEIS fails to clearly identify the biological resources on the proposed "3,300-acres available for disposal in the Tucker, San Benito River, and Condon zones" (DRMP/DEIS at pg. 127). In the past, essential conservation lands for rare species were "disposed" of by the BLM. A full inventory of the resources on any proposed disposal lands would need to occur. We do however support land acquisitions with high biologic, geologic or cultural resource values.	-none-

BLM Response: Refer to Common Response Section 3D and Section 1.9 of this PRMP/FEIS.

Comment: Air Quality	**Recommendation**
While we recognize the importance of the asbestos issue within the CCMA, there are other additional air quality issues	-none-

associated with the DRMP/DEIR. Here, the BLM fails to meet its NEPA burden of discussing all environmental impacts of the DRMP. 42 U.S.C. § 4332(C); 40 CFR 1508.7. First, it omits from the DRMP/DEIS any discussion or calculation of the greenhouse gas emissions from the activities on BLM-administered land within the planning area. Furthermore, the DRMPJDEIS fails to discuss the environmental impacts from the greenhouse gas emissions, most specifically climate change, that would occur under each RMP alternative. Lastly, the DRMP/DEIS fails to discuss in any meaningful way, the impact on both wildlife and human visitors of the massive amounts of PM 10, an estimated 1,700.5 tons per year, that is produced by ORV use, driving and mining. The DRMP/DEIS should be revised to include a discussion of the current baseline greenhouse gas emissions from within the BLM-administered lands in the planning area. It should also be revised to discuss the environmental and health impacts from future emissions of both greenhouse gases and particulate matter that would result under the five alternatives, including global warming, asthma and others.	

BLM Response: Comment noted. The DEIS (pg. 451) and CCMA Proposed RMP and FEIS (Section 4.7.1.2.2) state the following wuth regards to climate change. "This analysis assumes that global climate change will make the planning area warmer and drier by the end of the 21st century. However, the body of information and predictive models for climate change is in its infancy regarding prediction of site specific impacts to areas such as the CCMA, and the plan assumes that knowledge will advance quickly with the current emphasis on climate research and model development. As the RMP is implemented, BLM managers would place a continued emphasis on research, and studies may include components to assess the impacts of changing climate. In the event that climate change made achievement of RMP objectives themselves infeasible, the plan would need to be amended accordingly."

ORG-CRS: Coalinga Rockhound Society

Comment: Proposal	**Recommendation**
We realize that management of the Clear Creek area is a complex issue. We realize that	We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the only alternative that we prefer along with these following recommendations: I. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Chrysotile asbestos.*

the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that use science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological	A. Let the study "precisely delineate" all dangerous asbestos areas. B. Let roads through all dangerous areas be sealed. C. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area 1. Were they disabled because of asbestosis? 2. Were they hospitalized with asbestosis? 3. Are they now suffering ill effects of their work environment? (a.) Explain their ill effect, if any. II. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up. III. Let rock hounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rock hounding in the Clear Creek area. *Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52. IV. Waver-of-Liability forms may be acceptable for rock hounds. V. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities. A. Let rock hounds be permitted 24/7. B. Access restricted, by appointment only, to certain times or dates are not conducive to good public relations and are not acceptable. VI. Let the public lands with grazing rights leased to local ranchers be completely open for rock hound use with points of access at nearest public road. A. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates. B. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened. C. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

Creek Management Area, San Benito County, California".	VII. Let areas with endangered species be fenced off. VIII. Archeological or sites of historical significance should be viewable but protected from vandals. A. This will include hieroglyphics, engravings, paintings, or other artifacts. B. High fences, posting signs, and signs explaining the artifacts significance may be required. IX. Caves and mine shafts should be posted as "closed" to all visitors to the CCMA. X. The CCMA has been used for family activity for decades. Now is a times when "family" is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination. A. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others). The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area

BLM Response: Comment I: Refer to Common Response Section 1D and 1F(iii).

Comment II: Under the Proposed Action (HAZ-A3, HAZ-A4. HAZ-BG5, respectively), BLM would identify mining-related and other public land hazards and eliminate or mitigate as soon as possible; identify and resolve mining related trespasses with priority given to those cases where conflicts are occurring with visitor use and safety; and implement Best Management Practices (BMPs) related to Abandoned Mine Lands (AML) and mining activities outlined in Appendix V.

Comment III and IV: As noted in section 4.2.6.2 of the CCMA Draft RMP/EIS and section 4.2.4.1 of this PRMP/FEIS, "During public scoping, authorization of access into the Serpentine ACEC based on signed waivers of liability (i.e. indemnification of risk), was identified as a potential mitigation measure to inform visitors of the health risk associated with exposure to asbestos to determine their own willingness to accept the risk of exposure to asbestos in CCMA. In other words, this measure would allow individuals to "ride at their own risk", and reflects the preferred approach identified by the majority of the public scoping comments. However, developing a waiver of liability, or establishing indemnification of risk, would have no beneficial impacts on public health and safety because

neither approach would actually reduce exposure to airborne asbestos or improve overall protection of human health and the environment."

Comment V - VIII: Refer to Common Response Section 3D.

Comment: IX: See response to Comment II.

Comment X: Refer to Common Response Section 3D. The Proposed Action would not restrict access based on age of visitors.

ORG-FOCCMA: Friends of Clear Creek Management Area

Comment: EPA Risk Assessment	**Recommendation**
The Clear Creek Management Area Asbestos Exposure and Human Health Assessment did not achieve the goal of providing BLM with information on asbestos exposures from typical CCMA recreational activities. The Sampling and Analysis Plan for Asbestos Air Sampling Clear Creek Management Area San Benito County, California states that an equal amount of Asbestos Air Samples were to be used from each of the three separate "events (dry, moist and wet testing periods) in order to duplicate "typical recreational asbestos exposures". The EPA failed to follow these approved guidelines and complete this task. The Clear Creek Management Area DRMP/DEIS and the CCMA Asbestos Exposure and Human Health Risk Assessment also state nearly 20 times that the goal of the Asbestos Air Sampling was to duplicate "typical recreational exposures". The EPA failed to follow these approved guidelines and complete this task. Subsequently the Clear Creek Management Area Asbestos Exposure and Human Health Assessment provided data to the BLM of atypical visitor use being that the asbestos exposure data was not collected per the approved guidelines and subsequently an inordinate amount of samples from the third "event" (dry session) were collected and used in the Human Health Risk Assessment, furthermore "pilot" test data was also included in the final calculations.	The Clear Creek Management Area Asbestos Exposure and Human Health Assessment did not provide the Bureau of Land Management with any asbestos exposure data representative of "typical recreation" (their goal) within the Clear Creek Management Area, therefore the Bureau of Land Management has no data, information or reason to base a closure on. Subsequently the Clear Creek Management Area must remain "open" to all public use. The Bureau of Land Management must adopt Alternative A (no change) as the final Alternative being that the Bureau of Land Management has not data representing typical recreational exposures to naturally occurring asbestos within the Clear Creek Management Area.

BLM Response: Refer to Common Response Section 1C and 1D.

ORG-FGMS: Fresno Gems and Mineral Society

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-GRMC: Ghost Riders Motorcycle Club

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-LADBR: Los Altos Dirt Bike Riders

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-LGMC(1) Lemoore Gems and Mineral Club

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-LGMC(2): Los Gatos Motorcycle Club

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-RUTS: Racers Under The Son

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments of Steven Craig.	-none-

BLM Response: Thank you.

ORG-RRMC: Ridge Runners Motorcycle Club

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-SRMC: Salinas Ramblers Motorcycle Club

Comment: General Comments	**Recommendation**
The BLM presented me with a very large and technical document to review. While I have tried my best, I find that I cannot research and comment on all aspects of this document in the 90 days allotted.	-none-

Further, I have made several requests for additional information to the BLM. Some have been fulfilled but as of March 4, 2010 have failed to receive the some of the requested information. Specifically, the BLM has failed to provide: - Results of sampling from events before 2004 - History of road maintenance on Ri from March 2004 to October 2005. - A spreadsheet with calculations used by toxicologist Karl Ford on which he based a recommendation for an alternative that would allow up to five weekends of OHV recreation use per year. Regarding the last point, I did receive a spreadsheet titled CCMA Rider Risk2.xls that was forwarded to me by Rick Cooper that purported to show Karl Ford's analysis. The results however did not support the recommendation shown in the attached e-mail and the data was laid out in a format using the alternatives listed in the DEIS. These alternatives were not developed until after the scooping meeting in May of 2008 so it is unlikely that this spreadsheet is the data Karl Ford used in his analysis. In the documents the OHV community received via a FOIA request there is an e-mail from Karl Ford dated 2/15/2008 with a spreadsheet titled CCMA Rider Risk.xls. It is that spreadsheet that I wish to examine and comment on.	

BLM Response: Refer to Common Response Section 1F and 1G.

Comment: Purpose and Need – EPA Risk Assessment	**Recommendation**
What is the problem that the BLM is trying to solve? How many people who have every recreated, worked or lived in or near the CCMA have been diagnosed with an asbestos related disease? The BLM has not provided any facts in the DEIS to support the statement that there is a significant health risk of recreating in the CCMA as evidence by incidents of disease. While the EPA's CCMA Asbestos Exposure and Human Health Assessment (2008) provides new information, it does not provide information so compelling that it warrants the emergency closure or the severe restrictions on OHV use proposed in the preferred alternative. The EPA analyzed 456 samples in conducting their study. Of these over 60% of the samples, 276 in total were taken during dates that fall within the existing seasonal closure dates. Of the remaining samples, 151 were taken on days in November 2004 during the open use season but in a month that receives, historically, a low amount of precipitation compared to other months of the open use season.	-none-

While there was a rainfall event that preceded the November 2004 sampling, there were several days of dry weather between the rain event and the sampling. Prior to the October rain events there had been no significant rain since March 1st and 2', 2004 and total rainfall for the 2003/2004 rain year was below average. Only 29 samples were taken during February that, historically, is a wet month. None of these samples were taken in the days after a rain!snow event and prior to the February 11, 2005 sampling event there had been 12 days with no or only minor (> .05 in) precipitation.	

BLM Response: Refer to Common Response Section 2A.

Comment: EPA Risk Assessment Methodology	**Recommendation**
The conclusions and alternatives in the DEIS are built upon information from the EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008). This study, while providing additional sampling information, is a flawed piece of work that should not be considered significant new information for the following reasons: The EPA study is a poorly designed study. [Riders spent too much time on Clear Creek Road]. The sample area was not representative of the larger CCMA, and the lack of sampling during the winter month when visitor use is at its highest. While not necessarily a fatal flaw, the EPA's mix of ATV and motorcycle samples is disproportionately weighted towards quads when in fact the largest group using the CCMA recreate on motorcycles.	-none-

BLM Response: Refer to Common Response Section 1C.

Comment: Appendix I	**Recommendation**
The maps for Alternatives B, C, and D fail to show Sawmill Creek Road, a County road. Maps for Alternatives E, F, and G fail to show all County roads. At the time of this comment, the County roads are still public highways and have not been abandoned or vacated.	-none-

BLM Response: Refer to Common Response Section 1E.

Comment: 4.2.4.1 CCMA Asbestos Exposure and Human Health Risk, Page 332	**Recommendation**

The DEIS references "a 1992 BLM Human Health Risk Assessment" yet the BLM fails to identify this document or list it in 6.0 References.	-none-

BLM Response: Refer to Common Response Section 1F(ii). The 1992 PTI health risk assessment has been added to the list of references in this PRMP/FEIS.

Comment: Visitor Use Data	**Recommendation**
The information regarding visitor use in table 3 .8-1 shows that demand for the area has fallen since 2003. In addition, historic use is well below the historic levels of use seen in the 1980's. The 1992 BLM Human Health Risk Assessment for the Clear Creek Management Area prepared by PTI Environmental Services for the BLM states on page 22: "Although exact counts are not available, the BLM has estimated the annual number of visitors to the CCMA for the years 1977 to 1990 (BLM unpublished). Visitor use appears to have peaked in 1988, when BLM estimated 80,000 visitor-days were spent in the area."	-none-

BLM Response: Section 3.1.4.2 provides visitor use data prior to 2005 based on primitive infrared counters at the two main entrances. The program was updated to a modern and accurate traffic counting system in 2005. In 2007/2008, recreation use in the Planning Area was estimated at 35,000 visitor days, with about 80% of this attributed to OHVs. BLM determined that recreational use of public lands can be expected to increase as population grows, as described in section 4.1.2.1 of this PRMP/FEIS.

Comment: 4.2.1.1 Assumptions	**Recommendation**
The BLM has failed to disclose that the EPA toxicologists used the full data set of exposure samples to determine the human risk associated with each alternative. The majority of the samples were from dry periods when Clear Creek was closed to the public (personal communication from Daniel Stralka, EPA). The use of the September 2005 samples has skewed the risk analysis dramatically. True single-track trails are very narrow and generally rocky and surrounded by brush. 15-20 mph is an extremely fast speed usually attained by the top enduro riders in the country. The average rider would be lucky to attain 12 mph speed on true single-track trails. The DEIS fails to take into account that many riders who use Clear Creek live outside the area and only visit the area perhaps once or twice a year. Clear Creek is recognized as one of the top riding areas in the United States (Dirt Rider Magazine, March 2002) and as such attracts visitors from a wide area.	-none-

BLM fails to take into account that many people who recreate on OHVs do so for only a short time in their lives and then life change such as marriage, children, job relocation, injuries, etc. end their OHV pursuits. Interviews of people attending meetings will skew the profile of the average user because people attending meetings generally represent local users who frequent Clear Creek more often. Users who live outside the area are unlikely to know of or attend meetings. Riders who have sold their bike or quad are also unlikely to attend meetings. Per the EPA Super Fund Report cited in the DEIS in 4.2.2.3: "Furthermore, census data shows that California Central Coast population is highly transitory and includes visitors or residents that travel from long distances or move in and out ofthe area at a rate that wouldfurther limit the efficacy of epidemiological studies ofasbestos—related illnesses." The same logic should apply to the BLM's assumption of average exposure. Visitor permit numbers provided by the BLM after the release of the DEIS for the months January to April 2008 seem to confirm the above statements. The ration of season passes to weekly passes is roughly 10 to 1. (2,578 weekly vs. 227 season). (Personal communication from Sky Murphy on 3/2/2010)	

BLM Response: Refer to Common Response Section 1C. Section 3.1 of the CCMA Draft RMP/EIS and this PRMP/FEIS describe visitor use trends and forecasts based on a wide variety of user groups. Section 3.2 describes the challenges in calculating risk associated with such a wide varierty of visitors and uses noting that "there are assumptions and variables that can cause the calculations to either overestimate or underestimate the actual risk." The EPA risk assessment also contains a detailed discussion of the exposure and toxicity parameters which affect the calculations of estimated risk. As such, both BLM and EPA acknowledge that the CCMA Asbestos Exposure and Human Health Risk Assesssment (2008) may overestimate or underestimate risk if EPA's measurements of exposure and the assumptions of exposure frequency are either greater or less than actual conditions.

ORG-SVRGC: Salinas Valley Rock and Gem Club

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-SFGMS: San Francisco Gem and Mineral Society

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-SCVGMS: Santa Clara Valley Gem and Mineral Society

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-SCGMS: Santa Cruz Gem and Mineral Society

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-SCC: SaveClearCreek.org

Comment: Misleading Statements	**Recommendation**
Pg. IV; Within the paragraph, the phrase "Allowable use restrictions would significantly reduce risk to public health and safety" is misleading because it implies that actual risk would be reduced definitively. To date, there is no absolute, quantifiable knowledge of the actual risk, but rather only estimates of risk that have a wide margin of error based on theoretical approaches.	Pg. IV; Replace the misleading phrase with "Allowable use restrictions would significantly reduce estimates of risk to public health and safety".

Pg. 16; "Protection of human health and the environment" is the mission statement of the EPA, not the BLM. Therefore these statements are misleading and likely to be misconstrued as an attempt by the BLM to expand their mission and duties beyond their legal mandate and/or usurp the responsibilities and powers of other agencies. The list of resources is inaccurate and the term resource is used loosely. "Public health" is not a resource that could derived or extracted from the CCMA unless potential medications were found there, or physical exercise were obtained. Even if it were a resource as such, it would be far from #1 on the list that the BLM is responsible for. "Safety" does not meet the definition of a resource. Safety cannot itself be derived or extracted from the CCMA in any way. "Recreation" is not a resource, although resources are necessary for recreation. Pg. 22; "Protection of human health and the environment" is not one of the goals listed in the Purpose and Need required by 40 C.F.R. § 1502.13, and in accordance with Comment #1 is not a mission of the BLM, it therefore cannot be one of the management objectives being addressed in the EIS. Since the "overall protection of human health and the environment" is not a valid management objective for purposes of the EIS, the BLM's rationale for the determination that land tenure adjustments for the serpentine ACEC would conflict with management objectives is not valid. Furthermore, since land tenure adjustments (excluding those to acquire private property in or next to the CCMA) are valid alternatives but have not been addressed in any Alternative, the BLM has failed to "inform the decision makers and the public of the reasonable alternatives" (40 C.F.R. § 1502.1). Pg. 190; Since the "overall protection of human health and the environment" is not a valid management objective for purposes of the EIS, it is not appropriate to analyze Air Quality impacts on human health and the environment in the EIS. Pg. 352; "Protection of human health and the environment" is not one of the goals listed in the Purpose and Need required by 40 C.F.R. § 1502.13, and in accordance with Comment #1 is not a mission of the BLM, and it therefore cannot be one of the management objectives being addressed in the EIS. Since the "overall protection of human health and the environment" is not a valid management objective for purposes of the EIS, the BLM's statement that "potential for waivers of liability or indemnification of risk as 'stand-alone' mitigation measures for human health and safety	Pg. 16, The DEIS must be edited to change these statements to reflect only the official and true mission of the BLM: "It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations." Public health and safety must be removed from the list of renewable and nonrenewable resources. Recreation must be replaced with "recreational," as "recreation" is almost meaningless as a resource but "recreational resources" is very meaningful. Pg. 22, Remove § 2.2.3 from § 2.2, "Alternatives Considered but Not Analyzed in Detail". Analyze the concept of Serpentine ACEC Land Tenure Adjustments in detail. Include relevant discussion and analysis in the EIS of land tenure adjustments. Add Alternative(s) and/or amend existing Alternative(s) which include Serpentine ACEC Land Tenure Adjustments. Pg. 190; Remove the [air quality sections] from the EIS: Pg. 352, Remove the invalid statement from the EIS and replace it with the following

do not satisfy the purpose and need for the CCMA RMPIEIS" is not valid. [BLM DEIS, pg. 352: "Furthermore, these actions would likely have major long-term adverse impacts on human health and the environment due to the perception that exposure to airborne asbestos fibers above the acceptable risk range established under the EPA Superfund Act is permissible and authorized by the Federal government."] This sentence says that a mere perception, presumably in the minds of the public, would likely have major long-term adverse impacts on human health and the environment. Unless the BLM can corroborate the existence of ESP and/or telekinesis, this statement is certainly incorrect.	text: "Despite this, if implemented with due care, waivers of liability or indemnification of risk constitute viable means to permit the continuation of existing levels of activity within the ACEC while acknowledging that, although fraught with uncertainty, studies and reports on the postulated health risks of asbestos in CCMA still have value." Remove the entire incorrect statement referred to on pg. 352 from the EIS.

BLM Response: Pg. IV: Refer to Common Response Section 1D and 4A.

Pg. 16 & 22: Pursuant to BLM's Land Use Planning Handbook (Appendix F, page 15), section 1.7 of the CCMA Draft RMP/EIS describes the overall vision for the Clear Creek Managemetn Area derived from public scoping. EPA has been a cooperating agency during the development of the CCMA RMP/EIS because of jurisdiction by law and special expertise in protection of the environment and human health. The BLM's Land Use Planning Handbook also describes the criteria and benefits of cooperating agency status to establish a formal framework for local, State, Tribal, or Federal agencies engagement and active collaboration with a lead Federal agency (i.e. BLM) to implement the requirements of NEPA (pp. 6-7).
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In accordance with 40 CFR 1502.13, the CCMA Draft RMP/EIS and this PRMP/FEIS specify the underlying purpose and need to which the agency is responding in Chapter 1.

Pursuant to the Federal Land Management and Policy Act (FLPMA) of 1976, Sec. 102. [43 U.S.C. 1701] (a) The Congress declares that it is the policy of the United States that (underline added for emphasis) –

(8) the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, <u>environmental</u>, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor <u>recreation</u> and human occupancy and use;

(11) regulations and plans for the protection of public land <u>areas of critical environmental concern</u> be promptly developed;

Pursuant to the FLPMA Sec. 103. [43 U.S.C. 1702] (underline added for emphasis) :

(a) The term "areas of critical environmental concern" means areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards

(c) The term "multiple use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.

Pg. 190: Refer to Common Response Section 1G.

Pg. 352: See response to Pg. 16 & 22 above.

Comment: No Action Alternative	**Recommendation**
Pg. 19; NEPA requires that a "no action" alternative be provided (40 C.F.R. § 1502.14(d)). However, the "no action" alternative provided ("Alternative A") incorporates actions. "Alternative A" on page 19 indicates that "it would incorporate new human health information into BLM's public outreach and education asbestos hazard information program" and other programs. Pg. 25; NEPA requires that a "no action" alternative be provided. However, the 'no action' alternative provided ("Alternative A") incorporates actions, including • Use of dust suppressant on roads. • Installing a public vehicle wash facility. • Acquiring lands from private sellers. • Withdrawing the RNA and Clear Creek Canyon from locatable mineral entry.	Pg. 19; Split Alternative A into a true no-alternative action and a second alternative which includes the offending actions listed in Alternative A. Alternatively, remove the actions from Alternative A and incorporate them into later EA process(es). Pg. 25; If any these actions are permitted under a prior EIS or EA, then the appropriate document must be referenced to indicate that the action is officially permitted.

BLM Response: Refer to Common Response Section 3B.

Comment: Purpose and Need	**Recommendation**
Pg. III; The CCMA comprises 0.3% of the present range of the California C,5ondor and there is no evidence or reason to believe that OHV activity would affect the any effort to re-introduce the California Condor, or that it would not improve condor habitat, such as by providing more rodent carcasses. The red-legged frog and tiger salamander do not exist within the CCMA as stated on DEIS page 185, § 3.6.5.4. Therefore there is no need to specifically address these issues in an EIS. This part of the purpose and need is invalid. The previous EIS was executed very recently in 2006. The EIS process is very expensive to the government in terms of time, money and government employer resources, and very expensive to the people in terms of time and money and legal outlays. There is no evidence that there are significant changes in social and economic conditions in the stated areas since 2006, nor is there evidence of significant increased awareness and social value placed on the cultural and natural resources in the Planning Area since 2006. The area has always been valued for decades and continues to be valued in approximately the same ways by the vast majority of interested parties and visitors to the area. The primary change in social and economic conditions in San Benito County and the San Joaquin Valley as it pertains to CCMA was caused by BLM actions beginning May 1, 2008 and could easily be rectified in one simple move, without requiring an EIS. The need for an EIS is not sufficiently established by the issues in the referred-to paragraph, and the issues in the referred-to paragraph are not significant enough to be included in an EIS.	Remove the paragraph "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." Replace the referred-to paragraph with: "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 in the Planning Area."

BLM Response: Refer to Common Response Section 2B and 2C.

Comment: Range of Alternatives	**Recommendation**
The Purpose and Need states that there are increased demands for recreation on public lands within the planning area. However, no alternative addresses these needs by enlarging the total available trail mileage and acreage available for OHV use.	Modify each existing alternative so that each provides for increased recreational opportunities within or near the planning area, such as by

If the EIS is not modified the BLM will have failed to "inform the decision makers and the public of the reasonable alternatives" (40 C.F.R. § 1502.1) and will have failed to satisfying the Purpose and Need, which risks causing the corresponding R.O.D. to • violate the spirit and regulations of the CEQ and NEPA. • underestimate the public needs in a manner that is severe and foreseeable. • prioritize unproven scientific estimates of negative consequences over definite, known negative consequences. • direct BLM personnel in a way that fails to serve the public according to the BLM's stated mission.	designating an equal or greater number of miles of trails and acres for OHV activity than the number of miles and acres that would be closed for each alternative, within reasonable distance of the existing CCMA recreational area and of the central coastal area of California served by the CCMA.

BLM Response: Refer to Common Response Section 3A.

Comment: Impacts to OHV	**Recommendation**
The negative impacts of reducing OHV recreation opportunities in the CCMA are not adequately discussed in the EIS. These include important impacts to other federal and state lands designated for OHV recreation. Such impacts are directly relevant and must be included in the CCMA RMP/EIS because the CCMA RMP/EIS process: 1. has immediate and predictable consequences and impacts to these other lands. 2. directly and	Recommendation 1: The EIS must include discussion of impacts of displacing OHV users to other federal and state lands. Potential impacts include: • Loss of recreational opportunities due to occupancy limits being exceeded at other OHV areas (e.g., early gate metering on weekday mornings at Hollister Hills SVRA). • Negative effects of the increasing the travel time to alternate designated OHV areas from the most populous areas of central coastal California from around 3 hours to between 4 to 6 hours each way: • Loss of recreational opportunities and duration. • Increased fuel consumption, C2O release and highway congestion. • Increased risk of death from being in traffic longer (see Comment #23). • Increased incidence of illegal trespass in CCMA and other areas, and of off-trail riding in established OHV parks, by the public whose demands for recreational opportunities have not been met. Recommendation 2: The EIS must include discussion of the impacts of displacing OHV users to other federal and state lands that is caused by decreasing the available area at the same time the overall use trend is increasing, thereby increasing density and concentration of OHV use on those lands. Potential impacts include: • Increased localized environmental impact (trail overuse) leading to additional closures and further exacerbating the root problem and Purpose and Need of not enough OHV recreation opportunities to support the demand.

significantly affects current and potential users of the CCMA.	• Increased potential for injury or death due to head-on collisions and other accidents resulting from higher density use. Such risk may exceed the risks calculated by the EPA for Excess Lifetime Risk of cancer.

BLM Response: Refer to Common Response Section 4B.

Comment: Affected Environment	**Recommendation**
Pg. 116; Soil Resources: This section makes the unsubstantiated assumption that soil disturbance is undesirable by concentrating on limited aspects of disturbance. It fails to take into account that soil disturbance may benefit CCMA and public lands by several means, including • Assisting the spread of native vegetation through seed transport. • Augmenting the variety and availability of habitat for species that grow in disturbed soils on sandy slopes and along roads, including the evening primrose, reducing their probability of going extinct. • Improving foraging opportunities for avian and small mammals and dependent species. • Increasing siltation expanding the variety and types of plant and animal habitats available. • Improving recreational value. • Improving cultural and historic value. These benefits may offset many of the impacts deemed negative and yet they have not appropriately been considered in the EIS.	State in this section that changing the level of OHV recreational activity, which has maintained with care for decades, will have unknown and unstudied effects, including negative consequences including those stated above.

BLM Response: Refer to Common Response Section 1G.

Comment: Risk Assessment	**Recommendation**
The exposure durations and visits per year do not represent typical CCMA use patterns.	-none-

BLM Response: The visits per year actually came from the 1992 PTI Health Risk Assessment and are based on national recreational survey data and statements of CCMA users. The 30-year exposure duration is standard for recreational exposures per the EPA Risk Assessment Guidance for Superfund. Further, many CCMA users have stated that they have been riding at CCMA for more than 30 years. The risk numbers were expressed in ranges to provide information that users could adjust to their personal exposure experience.

Comment: Risk Assessment	**Recommendation**
The most frequent users of CCMA ride solo or in the lead position. If this was taken into account in the risk calculations, the Assessment would be more accurate and the numbers would be significantly lower.	-none-

BLM Response: The concentrations measured for lead riders are lower than those measured for trailing riders and solo riding would therefore have a lower excess lifetime cancer risk. The risk estimation for workers used lead rider data only. EPA used lead and first and second trailing exposures in the analysis because it was believed that group riding more closely represents actual CCMA use conditions.

Comment: Risk Assessment	**Recommendation**
The air samplers ran continuously and collected samples when the rider was encountering a dust cloud. In actual practice, a rider would avoid or hold his/her breath when traversing a dust cloud. Therefore, the sampling method caused overestimation of actual asbestos exposure.	-none-

BLM Response: The sampling pumps do not totally mimic human breathing behavior. The exposures EPA measured can overestimate or underestimate actual individual exposures. That is one reason why EPA uses a range of mean and upper confidence limit concentrations.

Comment: Risk Assessment	**Recommendation**
The exposure measurement did not take into account the precautions BLM publishes for riding at CCMA, i.e. "If riding an OHV in a group, spread out along the trail, and don't ride in another rider's dust."	-none-

BLM Response: The sample collection was designed to capture typical exposures. Avoiding dust would reduce the exposure to trailing riders and the overall risk of asbestos-related disease.

Comment: Risk Assessment	**Recommendation**
The Risk Assessment overestimates the speed, distance, and time-spent while riding at CCMA.	-none-

BLM Response: Certainly if someone spends an hour riding, the exposure will be less than someone who rides for 6 hours. The risk factors for an individual may be less or more than those shown in the Risk Assessment, based on individual riding practices and exposures.

Comment: Risk Assessment	**Recommendation**
Applying the adjustments noted in Comments 15 through 19 results in revised risk numbers that are within EPA's acceptable risk range.	-none-

BLM Response: Any change in concentration and duration of exposure will change the estimated risk. The EPA risk estimations reflect assumptions about exposure and duration in the context of standard EPA risk assessment methodology.

Comment: Risk Assessment	**Recommendation**
The OEHHA toxicity value was used in the Risk Assessment and predicts disease in the rider population. Since exposures have occurred for decades and no one has shown disease, the OEHHA value is inapplicable and should not be used.	-none-

BLM Response: There are no studies of the rider populations to prove or disprove the assertion that there has not been any asbestos-related disease. In fact, a study conducted at the University of California, Davis, and published in the Journal of Respiratory and Critical Care Medicine in 2005, found that residential proximity to naturally-occurring asbestos is significantly associated with increased risk of mesothelioma in California (*American Journal of Respiratory and Critical Care Medicine* Vol 172. pp. 1019-1025, (2005) © 2005 American Thoracic Society, doi: 10.1164/rccm.200412-1731OC, **Residential Proximity to Naturally Occurring Asbestos and Mesothelioma Risk in California Xue-lei Pan, Howard W. Day, Wei Wang, Laurel A. Beckett and Marc B. Schenker)**.

Inclusion of the OEHAA value was intended to provide the public with information on the risk range that could be estimated based on the measured exposures. It is entirely appropriate for use in assessing risks at CCMA because CCMA is located in California and the OEHHA toxicity value is the State of California value for asbestos exposure. As with all toxicity values, it is a standard risk model that does not predict individual outcomes, and therefore may or may not reflect disease rates in specific populations.

Comment: Preferred Alternative	**Recommendation**
Alternatives B through G fail to meet the Purposes and Needs as stated in the DEIS in at least the following ways: • They fail to address the "increased demand for use of public lands for recreation" Thousands of people and families count OHV and other forms of recreational opportunities inside CCMA and inside the ACEC as a critically important part of their quality of life. It is risky to human quality of life and happiness not to increase such opportunities, and especially to reduce them, by overemphasizing unknown risks to public health and safety, and overestimating them due to flawed scientific research. • They fail to "establish goals, objectives and management actions ... that address current issues, knowledge, and conditions"	Change the EIS to state that Alternative A is the BLM's preferred alternative. Change the appropriate discussion sections

comprising, among other things, recreational values, partly because they do not analyze the EPA's CCMA Asbestos Exposure and Human Risk Assessment (2008) in a manner appropriately differentiating acceptable risk arising from a recreational activity as opposed to acceptable risk according to public workplace, living place, or passive recreational standards. Many forms of active recreation carry risks that in general dwarf a 1 .OE-04 Excess Lifetime Risk level, making it relatively insignificant. A few examples of such activities include: scuba diving, cave diving, skydiving, car racing, motorcycle racing, street cycling, skiing, rollerblading, skating, snowboarding, rock climbing, parachuting, paragliding, parasailing, surfing, bungee jumping, gymnastics, etc. These higher risks are deemed acceptable as long as they are known by the participant or their guardian and these activities are not banned because they are deemed important to the mental health of participants and it is the participants who evaluate the risk vs. value proposition. They fail to "establish goals, objectives and management actions ... that address current issues partly because they do not analyze the EPA's CCMA Asbestos Exposure and Human Risk Assessment (2008) in a manner appropriately differentiating the rights of the willing participant safety from public bystander safety. Specifically, in nearly all recreational activities, when a third party is not involved, evaluation of the risk vs. value proposition is left up to the participant, and when a third party is involved and providing a service, the third party takes reasonable and appropriate steps to guard against assumption of liability. Examples of that are requiring hiking permits in national parks, requiring liability waivers to be signed by participants at race track events, acquisition of insurance, taking reasonably practical safety and informational measures, etc. Banning of such activities is not normally considered and is inappropriate because of the incommensurate damage to human rights and happiness. They fail to meet intentions of "identifying regional issues, and resolving those issues through public, inter-agency, and intra-agency scoping efforts." This is because the primary regional issue has plainly been identified at the BLM scoping meetings and public feedback to be an intense demand by the public to engage in OHV recreational activity that has been denied by the BLM, and which would continue to be denied based on the BLM's choice of the preferred alternative stated in the EIS. Any of the Alternatives B through G are detrimental to resolving this issue as far as they would cause numerous lawsuits, negative feedback, and fighting between the public and the government for years, if not indefinitely. They do not address "listing and/or additional habitat needs for species protected under the federal 1973 Endangered Species Act (ESA) "18 because the primary content of the actions within the alternatives is the reduction or elimination of OHV activity, and such reduction does not address species protection in any verifiable way, and may cause more harm than benefit. That the habitat status without OHV activity would be significantly more or less desirable than the habitat status with	of the document to indicate why.

OHV activity, and that the habitat situation was not adequately addressed by previous environmental assessments and impact statements, are not established facts. Nor is the core idea that "reduced impacts" are "beneficial" an established fact. They are unsuitable for use in a BLM EIS as they clearly fail to accomplish the BLM mission to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations, comprising BLM responsibilities of which the Purpose and Need must be a subset: o That the health of public lands is endangered is not established because only a narrow definition of "health" is considered by the EIS, not including mental health and health benefits of active recreation. Furthermore, EIS Alternatives B through C would not demonstrably address the natural health of public lands in any significant way from a natural perspective because spindly roads, trails and staging areas affect negligible amounts of the total acreage under consideration in the ACEC and CCMA. o Alternatives B and C would have no discernible effects on the diversity and productivity of the public lands, while Alternatives D through G would reduce the diversity and productivity of the public lands because they would directly reduce the number and scope of distinct activities within the CCMA while not directly offsetting the reduction with any new distinct activities, introduce new wildlife species, or introduce anything else on a discrete basis that can be considered to be additions to diversity. o It would severely reduce the use and enjoyment of public lands by present and future generations, rather than sustaining the public lands in a manner consistent with its use and enjoyment. CCMA is enjoyed by present and future generations, especially with regards to the most popular and dominant activities (OHV recreation, through-riding, prospecting, etc.), and elimination or reduction of these activities will reduce the use and enjoyment of public lands. The EIS must not specify a preferred alternative that clearly does not satisfy the Purpose and Need and which is not the best alternative according to the copies evidence discussed in these Comments and those of the vast majority of the public.	

BLM Response: Refer to Common Response Section 2A and 3A-3D.

Comment: Impacts to Public Safety	**Recommendation**
The DEIS has overlooked an important aspect that affects the overall health risk by considering only asbestos-related risks and not discussing or taking into consideration other important risks that comprise a similar Excess Lifetime Risk to the	Incorporate the above information

Excess Lifetime Risk of developing asbestos-related cancer that would be mitigated by reduction or elimination of OHV recreation within the CCMA. The CCMA is within a 3-hour drive of populous areas constituting most of the 35,000 visitors per year. Elimination of OHV user will require central coastal CCMA users travel further to reach substitute recreation opportunities. They will have to drive far north to areas such as Stonyford and Middle Creek (4 hours), far west to areas around Tahoe (5 hours), or far south to areas around, for example, Jawbone (6 hours). Conservatively, they will have to drive at least an extra 1.5 hours (90 miles) each way. The expected increase in miles driven can be calculated as follows: 35,000 visits/year, times 30 years (the EPA's average lifetime assumption of 30 years use of CCMA), times 180 miles/visit (the expected increase in highway miles driven per visit), or 189,000,000 miles. Based on the NHTSA statistic of 1.05 fatalities per 100 million miles driven 21,189,000,000 additional miles driven will cause 1.98 additional fatalities over the equivalent lifetime period.	above into one or more of the referred-to sections of the EIS as necessary to convey the risk information crucial to public health and safety.

BLM Response: Refer to Common Response Section 1G.

ORG-TMC: Timekeepers Motorcycle Club

Comment: 1992 CCMA Risk Assessment (PTI)	**Recommendation**
1992 study did not include statistical information from t..germane studies… about the mill and mine workers at CCMA . [BLM] 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	-none-

BLM Response: The risk assessment prepared in 1992 is not an EPA document. Rather it was prepared by the consulting firm known as PTI. As described in Chapter 1, EPA expressed concerns about the technical deficiencies of the 1992 PTI health risk assessment during the revision of the Hollister RMP in 2004. In particular, the EPA toxicity factor for asbestos is based on the review of 14 epidemiological studies of asbestos-related disease and death and combines risks from both lung cancer and Mesothelioma. Whereas, the URFs derived in the 1992 PTI report are flawed and do not combine both endpoints. Therefore, BLM agreed to work with EPA and the public upon completion of the study to incorporate the new health risk information into public land use decisions for the area. (DEIS pg. 1) Accordingly, The purpose and need for the CCMA Draft RMP/EIS states that "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." (DEIS pg. 4)

Comment: Lack of Evidence	**Recommendation**
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). [Referring to DEIS, Sec. 4.2.3 Overview of Impacts of Hazardous Materials on Public Lands] 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.	-none-

BLM Response: Refer to Common Response Section 1F(i).

Comment: No Action Alternative	**Recommendation**
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. The BLM 's 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	Correct the DEIS to reflect the actual no action alternative as required by law, not a modified version as is currently in the

consider this a no action alternative? Page 25, there is no present application of dust-suppressant, so this has been added. If this is all that is required to incorporate the new EPA report, then just do an EA to amend the existing ROD. Page 25 also states the BLM will acquire state lands and private in-holdings from willing sellers through acquisition or exchange. This is not in the current management directive, as the BLM has consistently stated they will not acquire additional lands within CCMA due to them not being allowed to acquire any additional "contaminated" lands. Page 25 states they will allow no mineral leasing or sales within Clear Creek Canyon, and will withdraw the RNA and Clear Creek Canyon from locatable mineral entry. This is also not the existing condition, and is being added in this DEIS.	DEIS.

BLM Response: Refer to Common Response Section 3B.

Comment: Purpose and Need	**Recommendation**
There is no need or purpose for a new RMP for CCMA. There appears to be only one change since the 2006 Decision, that's the EPA report. There is no reason to reopen all of the issues that were settled in the 2006 decision. The temporary closure of the CCMA should be removed and the 1984 Hollister RMP with Amendments (1986, 1999, and 2006) should be enacted. 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. 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 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	The purpose and need statement needs to be rewritten to better define the word ASBESTOS . Thought out this document (Draft RMP/EIS) the word ASBESTOS has been used 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 serpentine rocks made up of mostly chrysotile deposits. 4OCFR 1500.2 (b) 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

recreation, none of the alternatives satisfy the stated purpose and need. The BLM states a purpose of the CCMA DEIS is to address "Changes in social and economic conditions in San Benito County, the San Joaquin Valley, and the entire State of California". The BLM has failed to show why or how a decrease in visitor usage requires a new Management Plan or EIS for CCMA. Furthermore, the BLM has failed to show why or how energy production, which is not currently planned for the CCMA and is included in the 1984 Hollister RMP and the 1993 Oil and Gas Amendment requires a new CCMA Management Plan or EIS. The BLM has failed to document in the DEIS why the CCMA DEIS should address issues pertaining to the San Joaquin Valley and the entire State of California. Based on [these comments] the BLM has failed to follow NEPA process which requires the BLM to develop a proposal to address a need or action. The BLM's content in the November 2009 CCMA DEIS fails to document any of the purpose and needs listed in paragraph 1.1 of the document. This makes the November 2009 DEIS invalid.	planning policy. The document and the SLM 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. The following 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.

BLM Response: Refer to Common Response Section 2A – 2C.

Comment: Other Available Information	**Recommendation**
In reference to a list of documents regarding chrysotile exposure. "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." The EPA also published in December 2008 that Chrysotile asbestos is significantly less potent than amphibole asbestos, a position also held by the World Health Organization. Even though this was published prior to the release of the DEIS, this change in stance by the EPA is not reflected in their report.	-none-

BLM Response: BLM and EPA are aware of the documents that are referenced in the Timekeepers comment letter. While there is debate in the scientific community regarding the mode of asbestos toxicity, there is no debate among health experts and agencies that chrysotile asbestos exposure causes cancer and non-cancer disease. In 2008, EPA requested that the external Science Advisory Board (SAB) review an approach to address toxicities from various mineral forms of asbestos. The objective of the proposed approach was to investigate the influence of asbestos mineral types and fiber dimensions on estimates of cancer potency derived from epidemiological data. The Board agreed that mineral type and dimension are important determinants of asbestos toxicity, and that an effort to examine the relative contributions of these characteristics to asbestos toxicity was worth pursuing. However, the Committee found that the available exposure data was not robust enough to support the effort EPA proposed. In light of the Board's concerns, the EPA Office of Solid Waste and Emergency Response decided not to pursue the effort
.
The effort to examine the toxicity of various asbestos mineral forms and dimensions was in no way predicated on scientific evidence that chrysotile asbestos is benign. On the contrary, the evidence continues to support EPA's position that chrysotile is a known human carcinogen and causes debilitating and fatal non-cancer disease. The serious health impacts of chrysotile exposure are recognized by the Centers for Disease Control, the Occupational Safety and Health Administration, the National Institute of Occupational Safety and Health, the World Health Organization International Agency for Research on Cancer, and others. Recent follow-up studies of North Carolina textile workers confirmed the strong relationship between estimated exposure to chrysotile and mortality from lung cancer and asbestosis. M. Hein, L. Stayner, E. Lehman, J. Dement. *Follow-up study of chrysotile textile workers: cohort mortality and exposure-response* Occup Environ Med 2007; **64:616**-625 doi: 10.1136/ oem.2006.031005. Additional studies of the textile workers confirmed "that workers exposed to chrysotile are at increased risk of mesothelioma, as well as lung cancer." Loomis D, Dement JM, Wolf SH, Richardson DB. *Lung Cancer Mortality and Fiber Exposures among North Carolina Asbestos Textile Workers*, Occupational and Environmental Medicine, published online March 11, 2009 by the BMJ Publishing Group Ltd.

Comment: Social and Economic Conditions	**Recommendation**
[Impacts]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. [Goals and Objectives] 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.	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

Page 74 states: "SOCEC-Al. Protect and conserve natural values while allowing for tourism and commodity use of natural resources." Since the closure 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." 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.	Creek Recreation Area. Change the paragraph to read: SOCEC-Al. 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.

BLM Response: Refer to Common Response Section 4B and 4D.

Comment: Soil Erosion	**Recommendation**
Pg. 2; 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"

BLM Response: Section 3.8.4.2 of the CCMA Draft RMP/EIS and this PRMP/FEIS describe soils and two soil erosion studies conducted by PTI Environmental Services (1993) and Dynamac Corporation Environmental Services (1998) in the CCMA. As noted in this section, "PTI's best management practice recommendations for erosion and sediment control included limiting OHV access to soils having high erosion risk." Section 4.8.10.2 of this PRMP/FEIS provides additonal information on BLM funded research and field studies during the mid-90's on the roads and trails network in the CCMA to evaluate road related erosion and sediment problems for over 100 miles of roads and trails in the CCMA and to determine which barrens are at most risk due to accelerated erosion which delivers increased sediment to surface water.

Comment: Special Status Species	**Recommendation**
Pg. 53; 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.	Supply the missing data, or delete the SSS-All and SSS-A12 statement and just delete SSS-Al.

BLM Response: Refer to Common Response Section 1G.

Comment: Transportation Management Actions	**Recommendation**
DEIS page 47, states: TRANS-FG3. Decommission Clear Creek Road (Ri), and reclaim closed roads to protect sensitive resources, reduce sediment transport, and control erosion. Clear Creek Road (R1) is a county road, which the BLM does not have the authority or legal right to destroy.	Remove this statement from the DEIS

BLM Response: Refer to Common Response Section 1E and 3D. The Proposed Action considered in this PRMP/FEIS would designate Clear Creek Road (i.e. R1) as "open" to highway-licensed vehicles.

Comment: Affected Environment	**Recommendation**
CEQ regulation 1502.15 requires that the DEIS shall describe the affected environment. Nowhere in the document is CCMA described. The executive summary, page 1, states the HFO manages approximately 63,000 acres of public land within the 75,000 acre CCMA. The 30,000 acres within the Area of Critical Environmental Concern (ACEC), which is highlighted on many of the maps, so is well understood. What is not understood is exactly where the remaining 45,000 acres are. The DEIS also doesn't describe where the 12,000 acres of non-BLM land is located, and exactly who owns this land. This is a serious omission error since it can't be determined exactly what areas are being affected by the document if they are not accurately described. CCMA, as known to users only includes the 30,000 acres within the Area of Critical Environmental Concern. The term CCMA doesn't apply to the remaining area in the public's eye or understanding. I believe that is why the DEIS refers to these other areas as Condon Peak, Tucker Mountain, and the Cantua zones, since they are not part of what the public knows as CCMA.	Supply maps and tables describing these lands, along with identifying non-BLM lands and whether they are private, state, or other government owned lands. Add a statement on page 1 that this DEIS only affects the approximately 63,000 acres of public land, with no affect to the remaining non-BLM managed land.

BLM Response: The CCMA RMP/EIS describes the 'planning area' and the 'decision area' in Section 1.2 of the CCMA Draft RMP/EIS and this PRMP/FEIS to help define the term "Clear Creek Management Area". The affected environment is described in Chapter 3, including all the public lands in the Serpentine ACEC and four (4) non-ACEC management zones that are introduced in Section 1.2.1. Maps of the public lands and the private lands that are in the planning area are also included in Appendix 1 of the CCMA Draft RMP/EIS and this PRMP/FEIS.

Comment: Alternative D	**Recommendation**
This alternative promotes developing trails where the BLM admits there is no public access, nor do they see any access in the foreseeable future. CEQ regulation 1500.2(e) requires the alternatives to be reasonable. It is not reasonable to propose an alternative that requires access, but the agency acknowledges there is no access, nor do they see any public access in the foreseeable future. The DEIS should have provided details on how access will be obtained, the timeframe for this to occur, and other details to determine if this is feasible or cost effective. Developing 60 miles of trail in the Cantua, Tucker, and Condon areas isn't reasonable, nor acceptable, thus violates NEPA. Condon is south of CCMA, Tucker is north, and Cantua is south of Idria. None of these areas connect, so the trail network couldn't be connected, making the proposed trail network worthless. In addition,	Since Alternate D is impossible to analyze, and doesn't appear to be reasonable nor feasible, Alternate D must be deleted from the DEIS. Correct Alternative D to show its predicted vegetation loss is greater than Alternatives A-C. This same or similar error is repeated in most of the Tables in this section and all need to be

the BLM acknowledges on page 127, table 2.6-14 that there is no public access to the Tucker Mountain area, and there is no foreseeable public access. Building 60 miles of disconnected trail is not an equivalent replacement for CCMA which has over 200 miles of existing trails that all connect. Replacing over 200 miles of trail with 60 is not a viable trade. Alternative D must increase the mileage of trail to be considerably closer to the existing mileage to be considered even remotely equivalent to the existing recreational opportunities present in CCMA. DEIS Table 4.4-2 This table lists major detrimental effects for Alternative D for nonserpentine areas, yet predicts that vegetation loss is less than Alternative A. Alternative A would continue usage on existing trails, thus would be no change for Alternative A, which the table reflects. Building 60 miles of new trails, which would require vegetation loss over the entire 60 miles of new trails absolutely has to be more than using the existing trails in Alternative A, which would result in no vegetation loss. The table is wrong, and needs to be corrected to reflect actual results. These tables indicate a strong anti-OHV bias, as their conclusions are obviously wrong, with the intent for them to give the result desired, not the scientific facts. Table 4.4-8 on page 379 again shows a strong anti-OHV bias with the results of predicted vegetation disturbance levels at the bottom of the table being obviously incorrect. Since most of the noxious weeds can't live in the serpentine area due to its harshness or toxicity, then the noxious weed problem will be a much bigger problem in Alternate D, where trails are created in the non-serpentine soils where the noxious weeds can thrive. DEIS page 426, movement of Noxious weeds. Since noxious weeds can't grow in the serpentine region, and they thrive in the non-serpentine regions, then alternate A would have less impact than D since alternate D would and is shown to have major increases of movement of noxious weeds. This again shows the lack of scientific thought and reason, along with bias against OHV in the DEIS. Alternative D reads "Emphasis would be on developing 0HV recreation opportunities on public lands near 'Tuicker Mt., Condon Peak, or San Carlos Bolsa (Cantua Zone), where appropriate," but fails to describe what is "appropriate". Alt. D also fails to adequately discuss what environmental consequences would occur with construction of trails, roads, and campgrounds.	corrected. This includes table 4.4-8 for noxious weeds.

Response: Refer to Common Responses Section 3C.

Comment: Range of Alternatives	**Recommendation**
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. DEIS page 150, Table 3.3-1 lists the estimated costs for dust mitigation for unpaved roads. While the technologies are viable, they are not reasonable from a financial point of view. Every alternative specifies dust suppression, reference page 32, Table 2.4-1. Since the addition of dust suppressants isn't financially reasonable, its inclusion on every alternative violates NEPA policy.	Leave table 3.3-1 in the document to show the costs and technologies available, but state that costs are prohibitively not cost effective, and delete the dust suppression from every alternative.

BLM Response: The Draft RMP/EIS explains on page 20 that the alternative to designate CCMA an 'open' area for OHV use was considered, but not analyzed 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: Traditional Cultural Property	**Recommendation**
While it does appear that the BLM and the DEIS have recognized CCMA for the value the public places on the area, and have acknowledged its cultural value to the OHV community, they have failed to protect our traditional cultural use and value in any of the alternatives presented. Not only is the area of high cultural value, with almost religious value for many of the local users, it is well known within the OHV community. While the outside users may not be coming for its cultural value, they are attracted to the	Add to the purpose and need on page III and page 4 the following statement: Maintain the traditional cultural usage ofthe area, and to get CCMA listed in the NRHP for the three groups that consider this area a TCP, the California native community, the OHV community, and the Gem and Mineralogical Society. The purpose of getting the area listed is to ensure its

area due to its unique and challenging recreational experience.	continued viability to the affected groups.

BLM Response: Refer to Common Responses Sections 2A , 2B, 2C, 3A and 3D. The purpose and need statement contained in Chapter 1 (Section 1.1) of the CCMA Draft RMP/EIS and this PRMP/FEIS includes designation of areas in CCMA for motorized and non-motorized recreation opportunities. Listing a traditional cultural property (TCP) to the National register of Historic Places (NRHP) does not afford automatic protection of the TCP for the use of the group that values the TCP, nor does it provide for exclusive use of the TCP.

Section 4.2.1.1 of the CCMA Draft RMP/EIS and this PRMP/FEIS identify assumptions incorporated into the analysis of human helath risks associated with allowable uses in the Serpentine ACEC. Based on the assumption that "Risk calculations for hiking and hunting would be representative of all non-motorized use (i.e. rockhounding)", the traditional use activities practiced by the Native American community and the rockhounding community would continue to be allowable uses in the Serpentine ACEC undet the BLM's proposed resource management plan.

Comment: Risk Assessment – Uncertainty	**Recommendation**
The e-mail "...from Rick Cooper to Arnold Den and Jere Johnson of the EPA casts serious doubts about the scientific accuracy of the EPA report. Rick Cooper writes that the EPA has been consistent in mentioning that the risks could be much lower and perhaps zero. When the final EPA risk assessment was released, the words "and perhaps zero", were omitted."	-none-

BLM Response: All risk assessments contain a discussion of the uncertainties inherent in the risk estimation and the effect that those uncertainties may have on overestimating or underestimating the actual risk. Theoretically, at the extreme end of the spectrum, the uncertainties related to the factors which go into an assessment of risk could be such that the assessment predicts a risk where an actual risk does not exist. This was recognized, for example, in the EPA Guidelines for Carcinogen Risk Assessment (Federal Register Vol.51, No. 185, September 24, 1986, pages 33992-34003), which states in the discussion of the use of a particular procedure to predict cancer: "Such an estimate, however, does not necessarily give a realistic prediction of the risk. The true value of the risk is unknown, and may be as low as zero. The range of risks, defined by the upper limit given by the chosen model and the lower limit which may be as low as zero, should be explicitly stated." So the terms "as low as zero" or "perhaps zero" are used to describe the far end of the risk range for assessments with large uncertainties.

In the case of the CCMA Risk Assessment, the phrase "perhaps zero" was carried over as a standard expression of the uncertainty inherent in risk assessment. When Rick Cooper pointed out its inclusion, EPA realized that the phrase was not applicable to the assessment of the risk posed by the asbestos exposure at CCMA, and the phrase was removed. In fact, EPA believes that the risk detailed in the CCMA Assessment is significant and of concern.

The exposure and risk information used in the CCMA Assessment has less uncertainty than the information used in many assessments. The exposure data was comprised of asbestos concentrations in the breathing zone during actual CCMA activities, not hypothetical exposures extrapolated from general sampling of environmental media. Further, the EPA Integrated Risk Information System (IRIS) toxicity value for asbestos is derived from epidemiological studies of human fatalities and health effects, not from studies of test animals in the laboratory. Of the 14 epidemiological studies used to derive the asbestos toxicity value, 7 involve 100% chrysotile or predominately chrysotile exposures. While the risk assessment does not predict individual outcomes, there is more confidence that adverse health effects in humans is associated with increased exposure to asbestos.

In addition, the Superfund National Contingency Plan states that "For known and suspected carcinogens, acceptable exposure levels are generally concentration levels that represent an excess upper bound lifetime cancer risk to an individual of between 10-4 and 10-6 using information on the relationship between dose and response." The EPA IRIS toxicity value for asbestos is actually a mid-line lifetime cancer risk value, not an upper bound value, so it already leans to an uncertainty that underestimates risk, making the "perhaps zero" statement even less applicable. The upper bound risk would more closely match the risk estimations of the California Office of Environmental Health Hazard Assessment (OEHHA).

It is also important to note the following language from the Risk Assessment:

"This risk evaluation assesses only the excess cancer risk from exposure to asbestos at the CCMA. It is known that asbestos causes diseases other than cancer, such as respiratory and pleural disease. The non-cancer effects are not quantitatively taken into account in this assessment, but could actually be more significant to total disease outcome from CCMA asbestos exposure. **Therefore, the general probability of developing disease from exposure related to activities at Clear Creek may be significantly underestimated in this report.** "

This information additionally supports the inappropriateness of including the "perhaps zero" statement of uncertainty in the CCMA assessment report.

Comment: Risk Assessment - Recreation Use Scenarios	**Recommendation**
The EPA tests were run at too high a speed, and reducing the speeds to what an average rider actually rides at would have resulted in considerable less fibers/cc in the test results, thus resulting in reduced risk assessment numbers. Thus, the DEIS violates CEQ requirement 1500.1(b) on accurate scientific analysis. The EPA analysis must be modified to reflect accurate information, or the BLM must discard the inaccurate EPA report, or at a minimum recognize that it overestimates the risk and compensate for its known overstatement of the risk due to overestimates of an average user. This was not done.	-none-

BLM Response: The estimated speeds were derived by approximating the area covered and dividing by the time the sampler was on the trails. The concentration of asbestos found in the breathing zone during the rides is the important information.

Comment: Impacts to Vegetation	**Recommendation**
DEIS table 4.4-3, page 376 states [under Alt. A] there will be continued intensive motorized recreation within both riparian and upland serpentine plant communities. Just about all trails near creeks have been closed, except for limited creek crossings at hardened locations, so there is no intensive motorized use in riparian areas.	Change this statement to: Limited motorized recreation within both riparian and upland serpentine plant communities. Limited motorized recreation within both riparian and upland nonserpentine plant communities.

BLM Response: The table referenced in the DEIS describes the impacts to vegetation from motorized recreation, which occur frequently under the current land use plan.

Comment: Impacts to Social and Economic Conditions	**Recommendation**
Page 520, table 4.15-2 This table again shows the lack of care shown in the remainder of the DEIS. The percent change for 2000-30 are incorrect for the Diablo Range and Central Coast. They simply added the percent change above, instead of recalculating, so the percent change is considerably higher than actual. Diablo Range should be 70.4 percent increase, not 226.7 Central Coast should be 27.8 percent, not 80.0 DEIS page 522; There is something wrong with the $4 million figure. If you calculate the cost per visit, then $4 million divided by the 90,000 visits comes to $44 per visit. This is way under the actual costs of recreating at CCMA… The economic benefit to the community is at least $6-8 million per year for 43,000 visits per year, which would increase to over $14 million for 90,000 visits.	Correct the table to show correct percent changes. Correct the paragraph on page 522 in section 4.15.2.4 to reflect actual economic benefits to the community, ie change the $4 million number to $14 million.

BLM Response: Page 520, Table 4.15-2. As identified by the commenter, this table contained calculation errors that have been fixed. The new table has also been re-named "Tabe 4.15-1" in this PRMP/FEIS.

Comment: Impacts to VRM	**Recommendation**
[Ref. DEIS page 531, section 4.16.3.1] Nothing is specified that would have any effects on the visual resources, so delete this statement. It appears to have been made only to justify closing the area with no information on what activities could affect the visual	-none-

resources.	

BLM Response: DEIS explains on page 531, "Alternative A would have minor to moderate impacts on visual resources because current management practices do not afford visual protection standards for acquired lands, which would leave these areas in danger of potential deterioration of visual quality."

Comment: Benefits Based Management	**Recommendation**
The BLM Manual 1601, Planning, requires the agency to perform and disclose Benefits-Based Management. In the case ofCCMA, this would require the agency to disclose the benefits of the activities supported by CCMA, which include rock and gem collecting, 4 wheeling, and dirt bike riding. This is a major omission that was not performed, or at least is not included in the DEIS. The risks and benefits need to be compared and analyze and balanced to determine if one outweighs the other, or if the risk is acceptable. All activities have some degree of risk, and if the benefits outweigh the risks, they are socially acceptable. These include activities that are far more dangerous than recreating at CCMA, such as sky diving, scuba diving, horseback riding, etc.	Include benefits for dirt bike riding [like] family activity allowing families to spend quality time recreating together, and keep in shape. Learning new skills, etc.

BLM Response: Refer to Common Response Section 2A, 4B, and 4D.

ORG-3ROCKS: Three Rocks Research

Comment: Public Highways (R.S. 2477)	**Recommendation**
All of the main arterial highways passing over the subject public lands were clearly established before Congressional passage to the Federal Land Policy Management Act of 1976, which repealed Federal Revised Statute 2477. Several of these public highways support trade and commerce in southern San Benito County and western Fresno County. Many of these highways are clearly visible and passable as graded roads and they are delineated on early historic maps. These public highways provide public roads and right-of-way access to private lands within the subject area. Many of these highways connect between the paved Coalinga Road in Hernandez Valley and the paved New Idria Road in Vallencitos. Closing Clear Creek Road, for example, increases the travel distance between Hernandez Valley and Vallencitos by nearly 100 miles, thus adding significant burden to the public with by increasing their travel time and cost.	-none-

[BLM] propose to decommission or vacate public highways and to otherwise impair public use of historically established road and ways within the subject area. Schemes put forth by the Agency include charging private property owners fees for right-of-way access to their property, prohibiting access of their property to limited days, and dictating terms of use.	

BLM Response: BLM's Proposed Plan and Final EIS does not include proposals to decommission or vacate these public highways, and the proposed restrictions on public use of designated routes within the subject area would allow for continued historical uses except for OHV recreation due to the human health risk identified in Chapter 4 and the EPA Asbestos Exposure and Human Health Risk Assessment (2008)..

Under the Proposed Action, BLM would provide rights of ways over the public lands to and from the private properties within the subject area. Under the Proposed Plan and Final EIS, BLM would require private property owners to acquire rights-of-ways (ROWs) for use of routes off the public highways administered by the County of San Benito. The BLM's authority for administering rights-of ways across public lands was established in Article V of FLPMA, which allows Field Office managers discretion to waive charges and fees for ROWs. These ROWs would not dictate terms of use for private property or public highways which supersede their jurisdiction and BLM would honor valid existing rights for access to private property.

The issues related to R.S. 2477 are outside the scope of BLM's land used decisions for transportation and travel management on CCMA public lands because the U.S. Ninth Circuit Court of Appeals ruled that the validity of R.S 2477 claims can only be determined through the courts.
The following roads; Clear Creek (R1), Mexican Lake (R11), Wildass (R15), and Sawmill Creek (T158) have been informally identified as "County Roads" for a number of years. However, no record exists that San Benito County has a right of way or any legal right to these roads. The BLM has no record that the County established a right-of-way on the 26.1 miles of roads. The County has provided no information to the BLM to assert any rights-of-way and takes no responsibility for the roads, so by default these are Federal roads.

Furthermore, San Benito County abandoned road maintenance on these roads in 1994 and has not conducted maintenance on them for 16 years. Lack of maintenance has resulted in impacts to natural resources, including water quality, habitat for Federally listed species, and public health and safety. Public health and safety are being adversely affected by the lack of appropriate road maintenance, and in fact this has resulted in death and injury to the public. Unlimited use of these roads exposes the public to airborne asbestos and poses a health hazard.

Nevertheless, BLM, existing rights-of-way holders, and private property owners with in-holdings still need reliable access to the area for resource management and other purposes, but are frequently impeded due to the unmanaged condition of the roads. Improper road maintenance can also lead to excessive sedimentation and transport of toxic materials from the CCMA into various watersheds. This is affecting BLM's ability to comply with water quality standards for mercury and sediment within the CCMA. Stream crossings and riparian areas are being affected by the

lack of maintenance. A 1995 study by a BLM contractor identified roads within the CCMA as the primary contributor of sediment into watersheds within the area. Maintenance proposed by BLM in the PRMP/FEIS would reduce sedimentation from these roads.

The County's failure to maintain these roads conflicts with resource management goals and the overarching laws and regulations governing BLM. Therefore BLM acknowledges its' right and sole jurisdiction over the aforementioned roads. BLM has the appropriate equipment and staff to perform maintenance and repairs and will maintain a through route from the Coalinga-Los Gatos Road to Idria. BLM will continue to provide access for valid existing rights of way, mining claims, leases, and private landowners. Refer to section 2.3.3 for other management actions related to travel and transportation management.

Comment: Planning Area	**Recommendation**
Usage of the term "Clear Creek Management Area" is erroneous and confusing because the term lacks legal definition or meaning. Some BLM maps attempt to exhibit arbitrary boundaries enclosing an alleged "Clear Creek Management Area," but fail to cite official source documentation, and always include large portions of private property that are clearly not subject to federal jurisdiction. Without defining documentation, it is impossible to show on a map, or mark on the soil any specific point where with a single human step a person might enter or exit the "Clear Creek Management Area." The term "Clear Creek Management Area" is mute and without legal merit in the absence of descriptive documentation that describes the property or delineates its boundary. Pg. 629; The statement, "The population in the Planning Area is overwhelmingly urban, and rural areas are becoming increasingly less common as urbanization expands, especially in the San Francisco Bay Area, Central Coast communities, and in the San Joaquin Valley" is erroneous because it conflicts with the "Planning Area" defined on Page 1. The "the San Francisco Bay Area, Central Coast communities" and most of the "San Joaquin Valley" are outside of the Planning Area.	The Agency must produce a published descriptive documentation that describes the "Clear Creek Management Area" and clearly delineates its boundaries.

BLM Response: The CCMA RMP/EIS describes the 'planning area' and the 'decision area' in Section 1.2 of the CCMA Draft RMP/EIS and this PRMP/FEIS to help define the term "Clear Creek Management Area". The CCMA RMP/EIS also includes published maps that clearly delineate its boundaries, and other documentation to further describe the "Clear Creek Management Area".

The boundaries published on maps in the CCMA RMP/EIS (2009) are the same boundaires that were used to define the Clear Creek Management Area in the EPA's CCMA Asbestos Exposure and Human Health Risk aassesmment (2008) and the Record of Decisoion for CCMA Route Designation and RMP Amendment (2006).

Furthermore, the term "Clear Creek Management Area" has been used by Three Rocks Research for many years, as evidenced on the non-profit organiuzaiton's website (http://www.3rocks.org) as well as other previously published documents, including Figure 1 on page 4 of the "Geological and Historical Archaeology Phase 1 Reconnaissance of Routes R1 and R2 within the Clear Creek Management Area,San Benito County, California" by Fowkes & Iddings, June 20, 2008.

Comment: Purpose and Need	**Recommendation**
The Agency has very failed to articulate the purpose and need of the proposed action. This section of the document, which should address the purpose and need for the action, instead describes the "Purpose and Need for the CCMA Resource Management Plan" (see section heading). As this section clearly states, the "Purpose and Need for the CCMA Resource Management Plan" is to initiate a "planning effort" for which the BLM "needs to develop the CCMA RMP." This purpose and need section has absolutely nothing to do with any initiating NEPA action, which remains absent from the document. Although the EPA report provides more detailed charts and more tabulated data, the essential conclusion is generally the same as produced from an earlier report published in 1992 by PTI Environmental Services, titled Human Health Risk Assessment for the Clear Creek Management Area. Essentially the conclusions from the two independent studies are identical is that they both concluded that risk estimates may be over estimated, or under estimated. The Agency erroneously asserts that EPA's report titled, Clear Creek Management Area Asbestos Exposure and Human Health Risk Assessment (EPA 2008) mandates "significant new information that must be incorporated into a land use plan." The Agency's assumption of such mandate is arbitrary and capricious in that it asserts a willful and unreasonable action that disregards the facts. The Agency's assertion is erroneous because it does address this issue in the 2005 - Clear Creek Management Area Proposed Resource Management Plan Amendment and Final Environmental Impact Statement. This issue has also been addressed in many previous planning documents and planning documents associated with adjacent and nearby public lands. Additionally, it is well documented that neither the Red-Legged Frog or Tiger Salamander exist within the subject area environs.	-none-

The Agency is attempting to assert that because changes in "social and economic conditions … have led to increased demand for use of public lands for recreation" that this also translates into increased recreation demand for the public lands within the subject area, specifically CCMA. However, that thesis is erroneous based upon the Agency's own evidence as present on page 135 of the subject report, which as reproduced below clearly prove that CCMA visitor recreation is decreasing each year, hence proving that the Agency's assertion is false.	

BLM Response: Preparation of the Draft RMP/EIS is not the proposed action. Pursuant to CEQ regulations for implementing NEPA at 40 CFR 1502.1, "the primary purpose of an environmental impact statement is to serve as an action-forcing device". Therefore, the purpose and need for action described in the Draft RMP/EIS in Chapter 1 (pp. 3-4) applies to the range of alternatives, including the preferred alternative, which were evaluated in the Draft RMP/EIS, rather than preparation of the document itself. The purpose and need stated in the Draft RMP/EIS is consistent with 40 C.F.R. § 1502.13 because it clearly identifies numerous changes in circumstances "to which the agency is responding by proposing the alternatives including the proposed action". The purpose and need statement is also consistent with the guidance provided in the BLM's National Environmental Policy Act Handbook (H-1790-1) because it explains why the BLM needs to establish goals, objectives, and management actions for BLM-administered lands in CCMA that address current issues, knowledge, and conditions.

The portion of the Draft RMP/EIS referenced in the comment says that the EPA study "provides significant new information". However, the Draft RMP/EIS does not say that the EPA report mandates that this information be considered in an EIS. As the lead agency, BLM maintains the authority to determine when new information or changes in circumstances require preparation of an EIS, pursuant to 40 CFR 1502.4 (a) and (b). This guidance explains that environmental impact statements are often required to evaluate broad Federal actions "such as the adoption of new agency programs or regulations (Sec. 1508.18)". Accordingly, BLM and EPA are have been working together as cooperatng agencies to complete and RMP/EIS that describes broad actions relevant to land use policy that is timed to coincide with agency planning and decisionmaking for BLM public lands in CCMA.

The purpose and need for the 2005 Proposed RMP and Final EIS was limited to route designation. Similarly, other BLM planning documents referenced in the comment were prepared to address specific land use decisions based on oil and gas leasing or concerns for human health and safety from exposure to asbestos in CCMA. Although these documents make reference to the special status species identified in the purpose and need statement for the 2009 Draft RMP/EIS, BLM maintains the authority to determine when new information or changes in circumstances require preparation of an EIS. Additionally, the 2007 RMP for the Southern Diablo Mountain Range specifically excluded any decision for public lands administered by BLM in CCMA. As a result, Section 1.1 of the Draft RMP/EIS says "this planning effort is intended to be comprehensive, evaluating existing management plans and identifying regional issues, and resolving those issues through public, interagency, and intra-agency scoping efforts." Based on public scoping efforts, management of special status species is appropriate to consider while determining BLM's long-range management goals, intermediate objectives, and actions and options for meeting those objectives.

BLM's rationale for increased social awareness and demand for access to public lands is attributed to population growth and other demographic changes described in Chapter 3 (Section 3.15), rather than CCMA visitor use statistics. Furthermore, on page 135 of the Draft RMP/EIS, BLM explains that recreation use in the Planning Area was estimated at 35,000 visitor days in 2007/2008, and that these estimates have not changed drastically over the years, even with the increasing popularity of OHV recreation in California.

Comment: Major Planning Issues	**Recommendation**
[DEIS Pg. 7] The Agency promotes the above as being "Based upon the discussions held during three public scoping workshops and responses to the NOI to prepare the CCMA RMP/EIS" creating an image that these represent a fresh view of the major planning issues confronting the Bureau of Land Management. However, a review of previous planning actions undertaken by the Agency within the defined planning area illustrate that most of these issue been extensively studied several times. The Major Planning Issues, except for recreational age restriction and days-per-year recreation limits, have been extensively researched and well documented during pervious planning sessions and in previous resource management plans, environmental impact statements, and records of decision, thus showing that the majority of these issues have been well settled and do not need to be reassessed here.	The Agency must delete such erroneous assertions from the major planning issues statement. In the absence of realistic issues, the major planning issues statement is erroneous, the entire document is mute, without legal merit, and the initiating action is void ab initio.

BLM Response: The purpose and need statement for the CCMA RMP/EIS explains that during the revision of the Hollister RMP prior to 2007, BLM determined the unique resources issues and the complexity of CCMA land use decisions should be addressed in a "stand alone" land use plan. Concerns expressed by EPA regarding the adequacy of the human health risk information available at the time to make land use decisions for CCMA, and their plans to conduct a new health risk assessment for CCMA public land visitors were cited as the primary reason for exclusion of the CCMA from the broad scope of the issues addressed in the Hollister RMP (2007).

In accordance with 40 CFR 1502, BLM developed the Hollister RMP and its' associated environmental impact statement to address resources issues throughout the entire Hollister Field Office, and agreed to work with EPA as a Cooperating Agency to address concerns regarding human health risks associated with recreational use on CCMA public lands in the CCMA RMP/EIS in order to narrow the scope of the analysis and eliminate repetitive discussions of the issues addressed in the Hollister RMP (2007).

The CCMA Draft RMP/EIS (and Proposed RMP and Final EIS) includes a brief discussion of these issues in Section 2.1 to explain why the range of alternative management actions is similar for biological resources, cultural and paleontological resources, special designations, visual resources, fire management, energy and minerals, livestock grazing, social and economic conditions, and lands and realty.

Pursuant to the regulation cited above, BLM states (DEIS, pg. 300) "the depth and breadth of the impact analyses presented in this chapter is commensurate with the level of detail of the management actions presented in Chapter 2, and the availability and/or quality of data necessary to assess impacts. The baseline used for reasonably foreseeable effects is the current conditions in the Planning Area, as described in Chapter 3. Each resource program section in Chapter 4 further explains why the and whether the proposed land use decision for these resources programs would have a significant effect on the human environment in comparison to the current conditions under the no action alternative analyzed in the Draft RMP/EIS.

Comment: EPA Risk Assessment	**Recommendation**
Throughout the document, the Agency relies heavily upon the EPA's 2008 report titled, Clear Creek Management Area Asbestos Exposure and Human Health Risk Assessment, to the exclusion of any opposing or diverse scientific opinion. Although the Agency may exercise liberty in selecting which scientific authority or opinion upon which they wish to base their final determination, the Agency is obligated to exhibit professional and scientific integrity during the discussion and analysis in the environmental impact statement. However, the Agency has ignored any and all scientific research and opinion contrary to the EPA's 2008 report, thus creating an illusion of scientific consensus regarding human health risk associated with asbestos, and specifically with the chrysotile mineral natural to the serpentine deposit found within the subject area. There is a diversity of scientific opinion regarding the lack chrysotile etiology to which the public in entitled to know about, and which should be consider by the Deciding Officer. Omission of diverse and credible scientific opinion sways, and even biases, the scope of alternative presented to the Deciding Officer, and thereby impairs the Deciding Officer's ability to fairly, reasonable and objectively select an appropriate alternative. However, the Agency has purposely chosen to conceal the diversity of scientific opinion by excluding if from the draft resource management plan and the draft environmental impact statement. This accusation is directed because this author provided such references and copy during the public scoping comment period and the Agency chose to exclude or otherwise ignore that information. Therefore, the Agency's continued omission is arbitrary and capricious in that it asserts a willful and unreasonable action that disregards the facts.	-none-

BLM Response: Refer to Common Response Section 1C – 1F.

Comment: Terminology and Formatting	**Recommendation**
Using the word "asbestos" is confusing because it implies that the subject Serpentine ACEC contains a large volume of all of the asbestos mineral, which is erroneous. The subject Serpentine ACEC is known for its naturally occurring chrysotile deposit, and is known to be free of natural amphibole asbestos fiber. The word "asbestos" is being misused as a substitute term when the reference to a specific mineral is more appropriate and technically correct. According to the United States Geological Survey, "Asbestos is a generic name given to six fibrous minerals that have been used in commercial products." The definition is expanded further in the USGS Open-File Report 02-149 as, "These fibers belong to two mineral groups: serpentines and amphiboles. The serpentine group contains a single asbestiform variety: chrysotile. There are five asbestiform varieties of amphiboles: anthophyllite asbestos, grunerite asbestos (amosite), riebeckite asbestos (crocidolite), tremolite asbestos, and actinolite asbestos." (Virta 2002:5). The EPA asbestos risk assessment is based on 1986 data (EPA 1986) and fails to consider the current EPA opinion which admits that chrysotile is much less potent (EPA 2008), and may, in fact, not be a human health risk. The paragraph is misleading because it assumes that all gem and mineral collection, and rockhounding is a recreational activity. Merriam-Webster Dictionary defines "Rock Hound" as "1) a specialist in geology, 2) an amateur rock and mineral collector," which is not necessarily recreational. Some mineralogical collecting and prospecting conducted in the area is occupationally related and hence not recreational. The paragraph is erroneous because there is no "Spanish Lake Road" within the subject area. Since "agencies should employ writers of clear prose or editors to write, review or edit statements" (40 C.F.R. 1502.8), the public is left to assume that such unusual words, terminology or formatting might convey special meaning. Perhaps the author meant to refer to San Benito County's "Mexican Lake Road," which is a California public highway. The public depends on author's accuracy and is therefore not at liberty to interpret variant meanings, therefore the Agency must write clear prose that is comprehensible and unambiguous. The misuse of quote marks, single or double, and sometime combined with italic emphasis	The Bureau of Land Management must explain any special meaning intended by unusual formatting, or confess that it is a reflection on poor document management, the lack writing skill or the lack of competent editing and correct such deficiencies. The Agency must rewrite the subject document to remove the discrepant issue from the document. The original discrepancy must not be included or propagated in the final resource management plan, the final environmental impact study, or the record of decision. The final documentation should include corrected recommendations.

is very confusing. Since "agencies should employ writers of clear prose or editors to write, review or edit statements" (40 C.F.R. 1502.8), the general public is left to assume that such unusual formatting might convey special meaning. The public depends on author's accuracy and is therefore not at liberty to interpret variant meanings, therefore the Agency must write clear prose that is comprehensible and unambiguous.	

BLM Response: In the absence of an active mining claim, rock-hounding is managed as a recreational activity at CCMA. The definition of the term 'asbestos' includes both chrysotile and amphibole mineral types, both of which occur in the CCMA and were detected in the activity based sampling conducted in preparation of the EPA's 2008 human health risk assessment.

Other comments related to the existence of typos and quotation marks used to place emphasis on specific terms used in the CCMA Draft RMP/EIS are non-substantive and do not inhibit meaningful analysis because the document provides the purpose and need for the Draft RMP/EIS, includes a reasonable range of alternatives, and describes the affected environment and the environmental consequences of alternative management actions for the CCMA.

Comment: Regulatory Framework	**Recommendation**
Pg. 568; The statement, "Vehicle use in the Planning Area is managed under the direction and authority in 43 CFR Part 8340 'Off-Road Vehicles,' and Subpart 8342, 'Designation of Roads and Trails'" is erroneous because it conflicts with the "Planning Area" defined on Page 1 the same report. Since the "Planning Area" is defined "regardless of jurisdiction," then authority is not restricted to "43 CFR 8340," but would also include various State laws as applicable to jurisdictional authority. Pg. 623; The statement, "All public lands are required to be designated as open, limited, or closed to motorized vehicle access (43 CFR 8342.1)" is false because it incorrectly quotes 43 CFR 8342.1, which correctly states: "The authorized officer shall designate all public lands as either open, limited, or closed to off-road vehicles." Pg. 624; The statement, "On lands designated as "limited", cross-country travel is prohibited and travel is limited to designated "open" routes" is false because 43 CFR 8342.1 does not pertains to all "travel," but rather specifically to off road vehicle use. Pg. 627;	-none-

The statement, "The off-highway vehicle (OHV) regulations apply to use of routes by the general public" is inaccurate and misleading because 43 CFR Part 8340 is more accurately a subpart of 43 CFR Subchapter H —Recreation Programs. Thus implying that the regulation applies to the "general public" is false. The regulation applies to "recreation programs."	

BLM Response: Pg. 623; 43 CFR 8340.0-5 Definitions. (a) *Off-road vehicle* means any motorized vehicle capable of, or designed for travel on or immediately over land, water or other natural terrain.

Pg. 624; The sentence referenced by the commenter maintains validity within context of paragraph.

Comment: Visitor Use Data	**Recommendation**
Pg. 636; The statement, "The OHV-related environmental impacts from increasing OHV use on the CCMA route network …" conflicts with the data presented in Table 3.8-1 on page 135, which shows that OHV use is decreasing rather than increasing. Pg. 793; "If recreation use were to grow at a rate proportional to projected population growth in the Central Coast and Diablo Range areas, over 50,000 annual visits would be expected, compared to the 43,000 visitor use days recorded in 2006." [This statement] is erroneous because it is contrary to the Agency's statistic showing a significant reduction in CCMA visitor use (see page 135 of subject report).	-none-

BLM Response: The statement on pg. 636 is based upon overall projected population growth and the likely increase in OHV use as a whole. Recreational use of public lands can be expected to increase as population grows, not only in the Central Coast and Diablo Range areas that support local use but also throughout the HFO and California.

Comment: Overview of Impacts	**Recommendation**
Pg. 307; [The energy and mineral development] paragraph states "… inactive mine sites have negative impact on the viewshed of the area for recreation users …" which is false because many visitor enjoy historic mining sites. This paragraph [also] states "Increased traffic associated with active mine operations would increase asbestos emissions and pose an additional health risk to recreation users" which is false because possible mining claim might also include nonserpentine geology.	-none-

This paragraph contains an erroneous because is states "Existing hard rock mining claims and newly established claims will prohibit access to public lands by amateur rockhounding enthusiasts" which is false because such mining claim might also invite visitation by "amateur rockhounding enthusiasts." Pg. 309; The statement, "Lode claims in the area conflict with recreation opportunities" is erroneous.	

BLM Response: [DEIS, Pg. 307] Impacts to visual resources occur when the naturalness of the landscape is altered by land use activities, such as mining, road building, and construction of pipelines and other utilities. The statement regarding potential increases of asbestos emissions associated with energy and mineral development is based on reasonably foreseeable increase in traffic to and from these active mine operations through the Serpentine ACEC and the potential emissions from that associated ingress/egress. The DEIS properly asserts that establishment of mining claims would have adverse effects on rockhounding because the general public could be excluded from rockhounding opportunities on mining claims.

[DEIS, Pg. 309] As noted by the commenter. "while the claim holder cannot prevent others from crossing his or her claim for uses recognized under the Multiple Surface Use Act of 1955, or engaging in lawful recreational activities provided that they do not interfere with the claim holder's operations … , a claim holder does have the right to prevent others from prospecting and mining on the claim, except by invitation."

Comment: Special Designations	**Recommendation**
The San Benito Mountain Research Natural Area is located within the ACEC and development of trails and other visitor facilities would be contrary it being designated a "natural area."	-none-

BLM Response: The regulatory framework for management of the SBMRNA is discussed on in Section 3.10.2.2.

Comment: Route Designation Methodology	**Recommendation**
The statement, "Redundant routes are routes that no longer serve their intended purpose and/or exceed State soil loss standards" is erroneous because it fails to recognize the proper and accepted definition for the word "redundant."	-none-

BLM Response: Statement incorrectly includes environmental issues related to erosion and soil loss, not excessive or unnecessary routes serving the same destination. Therefore, the wording has been changed in section 4.3.2.1 of this PRMP/FEIS.

Comment: Transportation and Travel Management	**Recommendation**

The statement, "There is no production-grade application device available for a single track trail situation, especially when dealing with the narrow, off-camber and steep grade trails endemic to CCMA" is inaccurate because ROKON, Inc. does manufacture single-track equipment that could accommodate or facilitate various applications. However, it remains probable that extreme variation in trail camber, incline, soil compaction and many other factors may impair the efficacy of such applications. [DEIS, 4.3.11: Cumulative Effects] This entire section contains extraneous background data that creates unnecessary bulk which would be better served by reference to the source document.	-none-

BLM Response: ROKON agricultural application devices are two-wheeled, tow-behind units and would likely require extensive modifications to apply soil amendments, as stated in the final sentence of quoted paragraph: "...and would likely be unfeasible from a cost/benefit perspective, especially when labor is considered."

Pursuant to NEPA, Section 4.3.11 describes the cumulative effects of BLM's transportation and travel management alternatives analyzed in the CCMA Draft RMP/EIS. The document makes reference to a study prepared by the U.S. Forest Service and summarizes the relevant information to avoid presenting needless bulk.

ORG-TGMC: Tule Gems and Mineral Club

Comment: Comments submitted by individual members.	**Recommendation**
Refer to individual comments.	-none-

BLM Response: Thank you.

ORG-VWA: Ventana Wilderness Alliance

Comment: Preferred Alternative	**Recommendation**
CCMA and surrounding management zones are too vast, rugged and remote to be managed for off road vehicle recreation. Furthermore, the diverse soils that support rare and sensitive biological resources are unsuitable for intensive and newly developed OHV recreation activities.	-none-

Given the past problems with OHV adherence to trail systems we feel that the protection of the biological resources is best achieved by ALT E, however, we recognize the pressure to allow OHV recreation and therefore find elements of Alternative C and E potentially acceptable. Limitation to the Idria - Spanish Lake road does not provide adequate access to Clear Creek where both rock hounds and botanists find highly desirable. We believe that the public should be allowed to drive ("tour") through the CCMA on all of the county roads and access this beautiful area for passive recreational uses (such as hiking, birding, photography, scientific research, rock hounding), including within the Serpentine ACEC. We strongly encourage BLM to work with San Benito and Fresno counties to resolve the access and maintenance issues of the county roads for non-consumptive uses. The Idria Road is impassable to standard vehicles which would unfairly limit access to the CCMA. We request that the Clear Creek Road and entrance be kept open. ALT E should be modified to include the all of the County Road Network. The VWA strongly supports the Closure of Open Play Barren areas in ALT. C. Closure of CCMA — April 15th closure is much too early for botanical and birding usage of CCMA. We suggest that the county road network be open year round to highway (touring) vehicles with permits required in the dry season.	

BLM Response: Refer to Common Response Section 3D.

Comment: General	**Recommendation**
The DRMP/DEIS document is unnecessarily complicated and too long for the general public to assimilate and begin to provide germane comments. This is very unfortunate because we believe it excludes many individuals who appreciate the CCMA AND the surrounding 'management zones' and would otherwise be able to provide comments. Equally as unfortunate are the numerous (7) alternatives. Not one alternative, A G, is entirely acceptable and therefore, we are requesting a combination of one or more Alternatives in order to capture the interests of our organization. We therefore object to each individual alternative as they are presented in the DRMP/DEIS.	-none-

The description of the planning area (1.2) neglects to include "high number of sensitive plant and animal species", and also omits Incense cedar from the "unique forest assemblage".	

BLM Response: Refer to Common Response Section 1G and 3A.

Comment: Land Tenure Adjustments and New OHV Areas	**Recommendation**
All of the surrounding 'management zones' that the Hollister BLM interdisciplinary staff designated for this document have many sensitive, rare plant and animal species and communities. Decisions to "dispose" and/or develop trail networks/roads on these public lands is incongruous with conserving and protecting the sensitive natural resources that occur therein. We strongly oppose development of any new OHV recreation areas by the Hollister BLM Field Office for energy consumptive, destructive recreation for the following reasons: 1. Inadequate funding for additional law enforcement, ranger patrols, restoration and rare species monitoring at the CCMA or any of the proposed 'new areas'; 2. The southern Diablo Mountains are geologically and biologically diverse. These Public lands are highly sensitive and should be protected, not exploited.	Retain the lands identified in the DRMP/DEIS in the Tucker, Condon and San Benito River management zones. In all cases with OHV usage we insist that the BLM strictly monitor for compliance using the State Soil Loss Standards and unauthorized trail expansion. Violations need to result in trail closure and restoration. Additional mitigation for OHV use in the fragile area is that there must be a steady committed source of money to support personnel to monitor and enforce and to effectively close off the open play barren areas.

BLM Response: Refer to Common Response Section 3D.

ORG-WOHVA: Wisconsin Off-Highway Vehicle Association

Comment: General	**Recommendation**
WOHVA does not support any land management plan which does not list as an alternative the expansion of motorized recreational riding opportunities. WOHVA encourages the Bureau of Land Management (BLM) to work with motorized recreational groups to develop a partnership with these groups. It is our belief that by working with motorized recreational volunteer groups the BLM can find solutions to some of their financial and budgetary restrictions.	-none-

BLM Response: Refer to Common Response Section 3A.

III. PUBLIC COMMENTS AND FORM LETTERS

Tables X-3 and X-5 list the names of authors of individual comment letters and form letters received by the Hollister Field Office, respectively.

Tables X-3 and X-5 also identify the affiliation of commenters, and a "Comment Code" to direct the reader to the location of the comment summary and responses to comments in Tables X-4 and X-6.

The summary of the public comments on the CCMA Draft RMP/EIS and the individual or common responses to those comments were prepared by BLM in accordance with 40 CFR 1504.3.

Many comment received by BLM were beyond the scope of the CCMA Proposed RMP and Final EIS. These comments and other comments that represent opinions are acknowledged by BLM with the following response: "Comment noted. No response necessary" or "NA" (Not Applicable).

Table X-3; Individual Comment Author List (Written and e-mail)

Comment Code	Commenter
IND-COM-01	Aaron lindy
IND-COM-02	Alex Wagner-Jauregg
IND-COM-03	Alex Wagner-Jauregg
IND-COM-04	Andy Bajka
IND-COM-05	Anthony Colon
IND-COM-06	Art Thompson
IND-COM-07	Bryan Vaughn
IND-COM-08	BAMBAMB43
IND-COM-09	Ben Ellis
IND-COM-10	Frank Smith
IND-COM-11	Bill Zeber
IND-COM-12	Billy Petrushkin
IND-COM-13	Robert C. Wilson
IND-COM-14	Bob Bishop
IND-COM-15	Bob Rowlands
IND-COM-16	bobbyg
IND-COM-17	bondobob2
IND-COM-18	Brian Centeno
IND-COM-19	Burych, Donna (CIV)
IND-COM-20	Caleb Ashby
IND-COM-21	Carolyn Downey
IND-COM-22	Chris Will
IND-COM-23	CHARLIE MAZZELLA
IND-COM-24	Chris Beecroft
IND-COM-25	Chris Carbonel
IND-COM-26	Chris Hiatt
IND-COM-27	chris lesso
IND-COM-28	Chris Napolitano
IND-COM-29	Joe Sprenger
IND-COM-30	Claudia Mitchell
IND-COM-31	Curt McDowell
IND-COM-32	Dan R. Azar
IND-COM-33	Darell Kroeker
IND-COM-34	David Olson
IND-COM-35	Dave Wheeler
IND-COM-36	David & Lori Tharp
IND-COM-37	David Doudna
IND-COM-38	David Furrer
IND-COM-39	*Name withheld by request*
IND-COM-40	David Sundholm
IND-COM-41	Michael Damaso
IND-COM-42	James L. Ward
IND-COM-43	Dee Murphy
IND-COM-44	Dennis Scroggins
IND-COM-45	Ed Ferner
IND-COM-46	ED SANTIN

IND-COM-47	Joh Davis
IND-COM-48	Eric Olsen
IND-COM-49	Favia, Paul
IND-COM-50	Frank Mullaney
IND-COM-51	Frank Nye
IND-COM-52	Frausto, Richard
IND-COM-53	GARY LA HUE
IND-COM-54	George Alderson
IND-COM-55	Gerhard Donner
IND-COM-56	Glen Chambers
IND-COM-57	Glenn Wegner
IND-COM-58	Tom Keith
IND-COM-59	Greg J Meade
IND-COM-60	Greg Mirassou
IND-COM-61	Gus Meyner
IND-COM-62	Heather Kilby
IND-COM-63	Michael Lee Evans
IND-COM-64	Justin Hensley
IND-COM-65	ian plaine
IND-COM-66	Peter Giusti
IND-COM-67	Jim Vreeke
IND-COM-68	J. Braun
IND-COM-69	John Grinager
IND-COM-70	J.L Mangono
IND-COM-71	JAKE MEYER
IND-COM-72	JEAN SCHRUM
IND-COM-73	Jeff & Kathleen Jacobsen
IND-COM-74	Jeff Holmbeck
IND-COM-75	Jeffrey R
IND-COM-76	Joe Ferrante
IND-COM-77	John Culver
IND-COM-78	John Wilkinson
IND-COM-79	Jon Aichele
IND-COM-80	Joseph Rooney
IND-COM-81	jrhill
IND-COM-82	Judy Burson
IND-COM-83	Justin Hunter
IND-COM-84	Joe Sprenger
IND-COM-85	Karen Murphy
IND-COM-86	Kathi Peverini
IND-COM-87	Kathleen Joyce

IND-COM-88	Kathleen McGann
IND-COM-89	Dave Seghi
IND-COM-90	Kathy Woveris
IND-COM-91	Keith, Tori
IND-COM-92	ken arrington
IND-COM-93	Ken Stillwagon
IND-COM-94	Kenney Glaspie
IND-COM-95	Ken Deeg
IND-COM-96	KENT SUNDGREN
IND-COM-97	Kevin and Cindy
IND-COM-98	Steve Ritchie
IND-COM-99	Withheld by Request
IND-COM-100	kristin kearns
IND-COM-101	Ladd Johnson
IND-COM-102	Laura Okeson
IND-COM-103	lee bates
IND-COM-104	Leza Rodriguez
IND-COM-105	Linda Anderson
IND-COM-106	Jack Sontag
IND-COM-107	Mark L. Ward
IND-COM-108	Maloney, Marty
IND-COM-109	Marcia Gibbs
IND-COM-110	Mark Isaacs
IND-COM-111	Mark Gigas
IND-COM-112	Mary Hicks
IND-COM-113	Meyner, Gus
IND-COM-114	Withheld by Request
IND-COM-115	Mike Omodt
IND-COM-116	Mike Tanner
IND-COM-117	Wally Boggess Jr
IND-COM-118	Natasha Hunt
IND-COM-119	Nate
IND-COM-120	Nate Delaney
IND-COM-121	nathan mccreary
IND-COM-122	Nick Vleisides
IND-COM-123	Sherry Stortroen
IND-COM-124	David Dills
IND-COM-125	P Tehaney
IND-COM-126	Pat Rebich
IND-COM-127	Phil & Debbie
IND-COM-128	Paul Winslow

IND-COM-129	Przykucki, Robert
IND-COM-130	R. Leathers
IND-COM-131	Robert E. Crabill
IND-COM-132	Randall R. H. Adams
IND-COM-133	Randy Johnson
IND-COM-134	Ronald Hobbs
IND-COM-135	Rebecca Rosas
IND-COM-136	Richard Spotts
IND-COM-137	Rick Adan
IND-COM-138	Rick Kennedy
IND-COM-139	robbie_3146
IND-COM-140	Robert Henry
IND-COM-141	Rocky Hill
IND-COM-142	Robert Piper
IND-COM-143	Rob Porcella
IND-COM-144	Ryburn Family
IND-COM-145	Sam Baxter
IND-COM-146	Sebastian Ubillos
IND-COM-147	Sepnufer
IND-COM-148	SLVcougar19
IND-COM-149	Withheld by Request
IND-COM-150	Brent Snyder
IND-COM-151	J. McDaniel
IND-COM-152	Steve Craig
IND-COM-153	Steve Greenwood
IND-COM-154	Steve Schroeder
IND-COM-155	Ralph Higbee
IND-COM-156	Gina & Lawrence Peverini
IND-COM-157	Thomas F. King
IND-COM-158	The Hummels
IND-COM-159	Robert Jump

IND-COM-160	Tristan Mcvay
IND-COM-161	Troy Collins
IND-COM-162	Jeri Heiser
IND-COM-163	Wayne Michelsen
IND-COM-164	Wesley Paik
IND-COM-165	Michael J. Pereira
IND-COM-166	White, Mary
IND-COM-167	Brian Winn
IND-COM-168	Wayne Schrimp
IND-COM-169	Steve Knecht
IND-COM-170	Steve Hlebo
IND-COM-171	Patrick Angelo
IND-COM-172	John Barnewitz
IND-COM-173	Jay E. Bates
IND-COM-174	Danny Bawdon
IND-COM-175	David Bonvicin
IND-COM-176	Mark Hartsell
IND-COM-177	Neil Schmidt
IND-COM-178	Jim Bean
IND-COM-179	Mary Lou Froese
IND-COM-180	Nick Rizzi
IND-COM-181	Leslie Marquette
IND-COM-182	pismo1327
IND-COM-183	Howard L Hughes
IND-COM-184	Jeff Robinson
IND-COM-185	Hans Thern
IND-COM-186	Michael W Bouder
IND-COM-187	Dirk Paintedman
IND-COM-188	George Libby
IND-COM-189	Jon Taylor
IND-COM-190	Steve Brown

Table X-4; Individual Comment Summary & Responses

Comment Code	Summary	Response
IND-COM-01	When i was 11 years old my father brought me to clear creak several times in our old jeep and taught me how to drive it. i really feel that trips like those taught me alot about being responsable and i learned to care for the outdoors. My father is no longer around, but I have a 13 year old brother who i would love to be able to take out there and teach him some of the things my father taught me. from what i've read this area was mainly closed becouse of "health risks" but then read "The BLM admitted at the recent CA OHMVR Commission meeting in San Jose that to date they are aware of no cases of asbestos-related illnesses noted in the recreation community that has been using Clear Creek since the 1940s." i understand that to mean there really isn't a health risk. i also understand that monitering the area and having the resources to maintain the area can be costly but i would be willing to bet the people who want to use the area would be willing to help cover the costs, i know i would.	Refer to Common Responses Section 4A, 4B, and 4D.
IND-COM-02	Refer to Comments from Organizations: ORG-TMC	See BLM response to ORG-TMC
IND-COM-03	Refer to Comments from Organizations: ORG-TMC	See BLM response to ORG-TMC
IND-COM-04	The BLM Draft EIS/RMP fails to mention that smoking has decreased and risk calculations may overestimate risks for CCMA users based on current population smoking patterns. The BLM needs to include information that identifies that risk calculations may overestimate risks for CCMA users based on current population smoking patterns. The EPA report did not use typical recreational activities. The average rider does not ride at CCMA for 30 years. There is no evidence that any recreation by individuals is being done every year for 30 years straight. The test methodology used did not simulate how a human breaths. The test procedure used by EPA simulated how a machine would breath, that is on	Refer to Common Responses Section 1F(i), 1F(ii) 3A, 3C, and 3D.

Comment Code	Summary	Response
	a timed bases. Humans on the other hand instinctively hold their breath under heavy dust conditions. Most motorcycle riders spend the majority of the day on single track. The EPA test therefore does not reflect reality and is flawed. Change the report to show "the EPA has a concern regarding the risks but there are uncertainties inherent in risk assessment". The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain". The EPA's CCMA Asbestos Exposure and Human Health Risk Assessment (2008) provides **insignificant new information**. BLM is using the 2008 EPA Asbestos Risk Assessment as evidence when the document is only an assessment. BLM fails to identify there is lacking information that shows scientifically there is an asbestos risk at CCMA. The EPA report fails to show there are any health risks by not providing an Epidemiology report which would back up their data. The BLM EIS must indicate there is no epidemiological information available from the EPA because the EPA finds it too difficult to obtain a valid epidemiological report. BLM has failed to provide a No Action alternative but instead has added conditions to the No Action Alternative. The EPA testing did not simulate recreational riders. If they had followed the same information provided by the BLM Hollister Field Office they would have know to avoid the lead riders dust. BLM failed to mention the PTI study done in 1992. This report clearly indicates the EPA study which uses the IRIS toxicity values will have an overestimate of 7 times. On page 135 of the DEIS, visitor use shows a decline. BLM does not provide data to show an increased demand for recreation in the [Planning Area] Table 3.8-1; It is critical to know the	

Comment Code	Summary	Response
	number of unique visitors because the health assessment risk is based on individual exposure. The report needs to indicate that the BLM doesn't have information regarding the number of unique visitors to the CCMA area. *BLM Land Use Planning Handbook"BLM recognizes that influential information should be subject to a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties, to an* ***acceptable degree of precision****."* BLM has failed to follow the Land Use Planning Handbook in that it mandates important data like asbestos risks to have a acceptable degree of precision. . EPA used as guidance procedures from a Superfund site. This has nothing to do with recreational use at CCMA. BLM used the EPA document incorrectly by claiming the EPA document relates to asbestos risks relating to recreational use, which it is not.	
IND-COM-05	Please approve option A to reopen Clear Creek for OHV usage. I enjoyed exploring this area on my motorcycle. I never visited during any dry or dusty periods.	Comment noted.
IND-COM-06	I am expressing my desire to have access to Goat Mtn via R001-T104, as well as access to San Carlos Mine Area via R011. My desire is to have access for the expressed purpose of flying Hang gliders off of areas accessed by these trails. I understand the nature of the naturally occurring minerals in this area and would limit my speeds on these routes to minimize the raising of dust, and would support the enforcement of any speed limit deemed necessary. Access would be required by a limited number of 4 wheel drive vehicles usually less than 4; and typically only on weekends during the few months a year that the weather conditions would be promising for cross country flights from these areas. Thanks for allowing me to input this request and I hope you keep this access open for our use.	Refer to Common Responses Section 3D.

Comment Code	Summary	Response
IND-COM-07	Clear Creek is my favorite riding area in the United States and I have been to most of the ORV areas on the West coast over the last 20+ years. The sheer size and beauty of riding in such a place made it worth the 17 hour drive. The challenge of the terrain also made the trails rewarding as well. I *urge* you to re-consider the closure and it's negative impact not only on those that live close by (like my cousins in Paso Robles), but also that it is a treasure for ALL of us in the ORV community and AMERICANS the world over to keep this place open for our generations and future generations to be able to enjoy.	Refer to Common Responses Section 2C and 3A.
IND-COM-08	I have been to many asbestos classes through my work which is for the state of california and this type of asbestos in its natural state does not pose the same health risk. Proper signage to make people aware of asbestos so they can make their own judgement should be all you need to do!!!!!!!!! this is just another enviromental attack against offroad usage and public access to public lands. this hurts not only offroaders but campers, hikers, hunters, and anyone elese who likes the outdoors-----KEEP CLEAR CREEK OPEN LET THE PEOPLE MAKE THERE OWN DECISION	Refer to Common Responses Section 2A.
IND-COM-09	• Loss of Recreation Areas – Clear Creek offers unique challenging trails that are not available elsewhere. It would be an unacceptable loss of access for the thousands of visitors who regularly visit Clear Creek from the Bay Area, Monterey, and San Joaquin Valley. • To lower exposure asbestos, harden trails can be implemented. Roads also could be covered with different soil or road base to create corridors of hardened trails to allow access to non-asbestos areas. • Open more trails in non-asbestos areas of Clear Creek to offset closure in other parts of the management plan. • Limit the number of days people can visit Clear Creek in order to maintain a lower	Refer to Common Responses Section 4F

Comment Code	Summary	Response
	level of exposure to asbestos.	
IND-COM-10	For far too long the government has been creating new wilderness areas, that don't even qualify as "Wilderness" areas, areas of critical concern and using so called endangered species to limit and or close off public land to the people who use it most. We public land users have agreed to pay special fees and assessments to the government for the privilege to use our own lands. Our fees and love for the outdoors supply more money to the government.	Refer to Common Responses Section 1G.
IND-COM-11	My two sons, friends, and I have been enjoying Clear Creek since the early 1970's and it would be sad to see the restrictions imposed by the other alternatives which would deprive future families the great memories we now share. We have enjoyed motorcycle riding, camping, and four wheel drive activities throughout these years and have appreciated BLM's capable management of the area and the staff's always friendly and helpful attitude. Of the dozens of family and friends I know from children to adults, no one has experienced negative health effects from their activities at Clear Creek.	Refer to Common Responses Section1G.
IND-COM-12	I am an avid OHV user and so is my wife and our three daughters. We LOVE riding on BLM land in California and spend many weekends a year doing so. The Clear Creek Management Area has always been a favorite for my family and I and we really miss it. I personally have been visiting the area for fifteen years and think that closing it permenantly would be a terrible decision, if the users are aware of the potiential hazards then it should be their choice whether to proceed or not. I support the no action alternative and look foward to being allowed acess to CCMA again.	Comment noted.
IND-COM-13	When I am lying on my death bed, whether or not it is from "asbestos exposure" , I will think of the GREAT times I had at Clear Creek. Why can't you people understand, that no one will live forever, and that we knowingly accepted both the risk from the motor vehicles AND the asbestos, every time we recreated there? When we first started going there in 1975, there were still many	Refer to Common Responses Section 1A, 1B, 1D, and 4A.

Comment Code	Summary	Response
	"lifers" hanging around there, and to a person they said NO ONE THEY EVER KNEW died of asbestos exposure. Now we know the Clear Creek asbestos is of the non-hooked variety, and is either completely inert or relatively benign.	
IND-COM-14	Resources should be set aside to insure this park stay open to the public for OHV use.	Refer to Common Responses Section 3D.
IND-COM-15	I can understand closing the area during the summer months due to asbestos dust, but winter too! So my question is how many deaths can be attributed to asbestos poisoning from Clear creek? I'm sure the Clear Creek asbestos has a unique chemical/mineral tag allowing identification if there were any questionable deaths!	Refer to Common Responses Section 1F(1).
IND-COM-16	i have ridden for many years in the clear creek area and i believe that closing it to ohv use is a great loss it is public land and should be kept open it was well set up and a fantastic experience for myself and my sons riding pleasure to close it will be agreat injustice to the ohv community public land is for public use	Refer to Common Responses Section 2A and 4B.
IND-COM-17	I do not think that the BLM or anyone else has the wright to stop any one from using the land, lakes, rivers or streams! Do not close Clearcreek or any other public lands.	Refer to Common Responses Section 1G.
IND-COM-18	As a former resident of Hollister, and a frequent camper, hunter, and off road user of the clear creek area I want to weigh in on the impending closure of this area to off road use. Stop it. You would lock our youth into cities exposing them to the life threatening pathology of urban delinquency- rather than have them face the imagined dangers of asbestos at Clear Creek.	Refer to Common Responses Section 1G.
IND-COM-19	1) Access should be allowed on all the county roads. The Idria entry is not passable to regular passenger vehicles. 2) I oppose the proposed closure from April 15th to December 1st since most of the flowering season is in May and the creek areas have flowers until late summer. Some sort of access by permit should be allowed year round. 3) I oppose new roads/routes in the Condon peak area. The area is impassable in the rainy season due to the clay soils. This area has extensive wildflower displays. The ridge up to the peak is quite steep in areas and building a road would have significant impacts. The ridge is an excellent hiking route and I feel it should remain	Refer to Common Responses Section 3A, 3B, and 3D.

Comment Code	Summary	Response
	that way. 4) I oppose expansion of recreational vehicle usage into the surrounding Cantua, Condon and Tucker areas. These remote areas would be hard to monitor and since they border private lands would likely lead to conflicts with private property owners. The draft provides very little information about biological resources in the expansion areas. It would be improper to adopt this in a plan without further study. Continuing and regulated use in the current areas would be preferable to expanding usage into new more pristine areas. 5) I do support aspects of Alternative C, though my preference would be to limit usage in the CCMA to county roads and passive hiking. It is very important that Alternative C eliminate open barren use areas and limit the route network to a more manageable 150 miles. By limiting travel to marked open routes and banning open barren usage, motorcycle and OHV usage could be more constrained and further damage to the fragile resources could be minimized. The barrens of Larious Canyon are particularly important to be left closed so they can recover. 6) For OHV usage to continue in the CCMA, the RMP must clearly identify sufficient levels of funding and staff to monitor and ensure usage is limited to the route network.	
IND-COM-20	Reasons why the Clear Creek area should be open to the public: public land funded with tax dollars, loss of OHV areas, family recreation and social values, [and also because of negative] fiscal impact it will have on surrounding communities. The OHV populations spends a lot of money in local economies for gas, food etc. every year. With California already being in a major recession this will only help to make things worse. Clear Creek area serves as access for pig hunters. Hunting pigs is one of the hardest things to do in California legally. If the BLM keeps Clear Creek closed it forces pig hunters on the wrong side of the law. A side of the law they didn't ask to be on. Also wild pigs in California do more harm to the environment than any OHV. With pigs having one of the fasted population growths in California	Refer to Common Responses Section 3D, 4B, and 4D. The Proposed Action analyzed in this PRMP/FEIS would allow hunting on all the CCMA public lands.

Comment Code	Summary	Response
	this decision would only make things worse on the environment and surrounding properties owners. Currently there is plenty of land for people to go to that want to get away from OHV's and hunters. Refer to Comments BRC-FORM-LTR	
IND-COM-21	I am a member of the Mariposa Gem and Mineral Club, and our field trips to Clearcreek have been suspended pursuant to closing of Clearcreek. We are very interested in visiting this area with much geological phenomena. Please enter my comments that these public lands should indeed remain "PUBLIC".	Refer to Common Responses Section 3D.
IND-COM-22	PLEASE RESTORE CLEAR CREEK RIDING NOW. AS A VETERAN, THIS IS WRONG.	Comment noted.
IND-COM-23	I am an avid off roader and have heard from freinds & family how great the Clear Creek area used to be for challenging trails. I don't see why after all these years we have to concede & not use this area. Please reopen this recreation area I would like the chance to make my own memories at Clear Creek.	Comment noted.
IND-COM-24	The 35,000 visitors that recreated at the CCMA have been over whelming other use areas and creating detrimental effects on these other areas from the increased use. There are other areas that had been closed to legal OHV use that are now getting used again because there is very limited areas open for legal OHV use in Central California Area. Mariposa County and others are getting more complaints of private land trespass in the last two years because of the closure of the CCMA and the loss of miles of routes on the National Forests, along with seasonal closures during prime riding time. The BLM instead of planning for increased needs of more OHV vehicles is doing the opposite and trying to the close more areas and routes that are already designated for that use. Many of the asbestos exposure calculations used a very high amount of "dry" samples despite known visitor use of the Clear Creek Management Area being at its *lowest* level during "dry" conditions. Subsequently, due to the inordinate amount of "dry" samples used in the EPA calculations the amount of "wet" samples	Refer to Common Responses Section 1C, 4B. 4D, and 4E.

Comment Code	Summary	Response
	was dramatically reduced despite known visitor use of the Clear Creek Management Area being at its *highest* during "wet" conditions, OHV use is restricted to October 15 to June 1. **This methodology guaranteed very high asbestos exposure levels. Or in other words, the methods used by the EPA guaranteed failure.** Refer to Comments BRC-FORM-LTR	
IND-COM-25	I have been hunting the BLM land (Tucker Mtn) for close to 30 years. It has always been my understanding that BLM had an easement from clear creek through Baker canyon. In fact years ago their was a sign up sheet for those traveling this easement thru privet land to BLM. Now, I own land which borders the BLM through Baker canyon, (Tucker Zone). I am a firm believer that BLM belongs to the people and should not be sold to privet individuals. PLEASE BE ADVISED, IF BLM FEELS THEY DO NOT HAVE AN EASEMENT FROM CLEAR CREEK TO BAKER CANYON I WILL DEED BLM A EASEMENT THROUGH MY PROPERTY FOR PUBLIC ACCESS.	Refer to Common Responses Section 3D.
IND-COM-26	Why can't Clear Creek be like other California buildings, by putting up a sign that says this area is known to have things that "might" cause cancer. Then they would be not legally-liable. All the winters I have road there, it is almost never dusty. When it is dusty in the spring or late fall you could close it, and most riders would still be riding the Sierras or other areas anyways. Let us use this beautiful remote area that no one else will use anyways due to all the mines. I live in North Dakota during the summers due to my work, and they are opening places to ride, because they know its a growing industry, the public demands it and want the tourist and weekend dollars. I'll pay to ride there, just open it.	Refer to Common Responses Section 3A.
IND-COM-27	The actual danger to health from naturally occurring asbestos is low. I feel our public lands should stay open and available to the people they belong to namely the public.	Refer to Common Responses Section 2A and 4A.

Comment Code	Summary	Response
IND-COM-28	We have been riding the Clear Creek area since the late sixties and in that time I have seen the OHV areas decrease and demand explode. We need more areas like Clear Creek not less. What ever happened to ride or enter at your own risk? Speaking of risk of the over 200 people I know who rode Clear Creek not one as came down with an asbestos related problem and I am talking about family members who started riding the area in the sixties.	Refer to Common Responses Section 2A and 4A.
IND-COM-29	I have been riding there since 1969 with no health issues. Does that fact account for anything?	Refer to Common Responses Section 2A and 4A.
IND-COM-30	I am a rock collector who has had the opportunity to camp and collect prior to the current closure of Clearcreek. I have always wanted to go back to collect some other minerals. Please don't close all access to the Clearcreek area. Despite the dune buggies and motorcycles, there are other groups of us who enjoy this unique area for the opportunity to collect specimens found nowhere else in the world as well as just enjoying the scenery. I was well aware of the asbestos before I went in and was careful to keep the windows up and even wore a mask while going thru the area used for off roading. Given the health information, let us passive users make the choice and allow the Clearcreek area to be used by the public.	Refer to Common Responses Section 3D.
IND-COM-31	Refer to Comments from Organizations: ORG-SCC	See BLM responses to ORG-SCC.
IND-COM-32	Please allow the citizens of California and the United States to decide for themselves the risk of illness or injury to which they will expose themselves. Please allow me to take personal responsibility for my own life and that of my family. The EPA conclusions regarding the risk of asbestos exposure from riding at Clear Creek are based on excessively conservative assumptions of tolerable risk. Mmost people only ride several days per year. I can accept signing a release of liability or an entrance fee to help with management. But the complete exclusion of motorcycle trail riding is an extreme and unnecessary decision. Please	Refer to Common Responses Section 1C, 1D, and 4B.

Comment Code	Summary	Response
	inform the public- do not try to unnecessarily restrict our recreation opportunities at Clear Creek. Please re-open all the Clear Creek trails.	
IND-COM-33	I and my family have visited Clear Creek on several occasion throughout the past 30 years. Not one of us has had any health issues because of it. My understanding is the the esbestos that is found there is not of the industrial type that causes any type of health issues. This is an area that has been and should still be available to the public for recreation.	Refer to Common Responses Section 1A and 1B.
IND-COM-34	Refer to Comments BRC-FORM-LTR	See BLM responses to BRC-FORM-LTR.
IND-COM-35	Refer to Comments BRC-FORM-LTR	See BLM responses to BRC-FORM-LTR.

Comment Code	Summary	Response
IND-COM-36	Refer to Comments from Organizations: ORG-FOCCMA Appendix IV - Camissonia benitensis Compliance Monitoring & Adaptive Management Plan of the DEIS Issue 1: (pg. 628): The use of the term "potential" habitat is ambiguous and can be misleading it should be clearly described and clearly listed as a lesser priority. If Ecology and Life History of the San Benito Evening Primrose, Taylor (1990) and The Recovery Plan for *Camissonia benitensis* U.S. Fish and Wildlife Service (2006) are out of date or the BLM feels these documents are incorrect a new study needs to be conducted and reviewed with the findings made public. Issue 2: At the time of obscuring tracks there needs	RESPONSE 1: It has been clearly documented that much of occupied *Camissonia benitensis* habitat consists of serpentine soils on relatively level terraces, within close proximity to perennial streams. These are the "serpentine alluvial terraces" described by Taylor (1990). While much of the occupied habitat is located within the Serpentine ACEC proper, naturally-high sediment loads originating from the extensive barrens of the Serpentine ACEC have resulted in localized deposits of serpentine alluvium in drainages outside of the Serpentine ACEC including lower Clear Creek, lower White Creek, and lower San Benito River. This has resulted in areas of both occupied and potential habitat located well outside of the Serpentine ACEC. Until recently (April 2010), it was believed that the primary habitat for *Camissonia benitensis* consisted of serpentine alluvial stream terraces. It is now known that *Camissonia benitensis* also grows in uplands on serpentine soils in the geologic transition zone between serpentine and nonserpentine rock types (see 2010 annual report for *Camissonia benitensis* to the USFWS). Some of this habitat consists of serpentine landslides located up to 1 mile outside of the Serpentine ACEC. There are also now a few known examples of the species growing on shale outcrops at the geologic boundary. The discovery of this new type of upland serpentine and shale outcrop habitat has more than doubled the number of

Comment Code	Summary	Response
	to be adequate documentation i.e. photo points, date, time, person submitting the documentation, OHV or other as the cause, and if it is a known occurrence or potential habitat. Again potential habitat should be considered a lesser priority. Issue 3: There needs to be a mechanism in place that determines and documents other types of activity that cause "Disturbance" OHV operation is not the only possible cause of disturbance so the description Low, Moderate, and High incident of OHV non-compliance should be further refined. Once again potential habitat is a lesser priority. Issue 4: Why was there no mention as to the frequency of proposed monitoring for Alternative A, B, or C? Issue 5: "Introduced sub-occurrences" Does this mean the BLM is engaged it the cultivation, propagation, and distribution of a federally listed species? There is no mention of a reintroduction or introduction program for CABE in the DEIS. This program needs to be clearly defined in the DEIS. What are the goal's of reintroduction / introduction by the BLM? Issue 6: I have not been able to find public listing in	known suboccurrences of the species, as well as more than doubled the total area of known occupied and potential habitat. Due to additional new types of habitat where *Camissonia benitensis* is found, the following disclaimer regarding a strict potential habitat definition is warranted: "Therefore, while the criteria above are a general guide, the consideration of a site as potential habitat should not automatically be rejected if it fails to match the criteria in every way". Potential habitat is important to recovery of *Camissonia benitensis*. The USFWS indicates equal importance of both occupied and potential habitat by almost always describing actions to both within the same sentence within the Recovery Plan. Due to the importance of both occupied and potential habitat integrity in recovery of the species, equal priority is given to both occupied and potential habitat OHV compliance monitoring. RESPONSE 2: Documentation of OHV tracks within both occupied and potential habitat always occurs prior to obscuring tracks and repairing fence breaks, as needed. Site condition documentation parameters are described in detail on page 630. Due to the importance of both occupied and potential habitat integrity in recovery of the species, equal priority is given to both occupied and potential habitat OHV compliance monitoring. RESPONSE 3: In recent decades, OHV disturbance has been the primary disturbance. This is the reason cited by the USFWS for Federallylisting *Camissonia benitensis* as Threatened. The *Camissonia benitensis* habitat monitoring plan was developed with the direction of the USFWS. Although the plan calls for monitoring of OHV disturbance, we do note other incidents of significant disturbance that occur on rare occasion, such as recovery of large rocks or logs by the public, dragged across habitat. The vast majority of disturbances observed within occupied and potential *Camissonia benitensis* habitat, however, are due to OHV trespass. Due to the importance of both occupied and potential

Comment Code	Summary	Response
	the Code of Federal Regulation or the Federal Register that shows the BLM HFO has the necessary permitting for a reintroduction / introduction plan. This needs to be addressed in this DEIS along with the protocol that outlines the BLM's plans concerning the C. benitensis re-introduction / introduction program. Issue 7: Is this GIS data based on soil composition, vegetation type, slope aspect…. or a combination of criteria? A project of this magnitude will also require field time of highly skilled staff to supplement GIS data and allow for the best possible outcome. GIS data is a tool, a starting point for actual field time to assess an area of potential habitat. GIS data should not be use exclusively to define potential habitat. These protocols need to be understood and clearly defined. Once again potential habitat is used ambiguously and needs to be clearly defined and if Ecology and Life History of the San Benito Evening Primrose, Taylor (1990) and The Recovery Plan for *Camissonia benitensis* U.S. Fish and Wildlife Service (2006) are out of date or the BLM feels these documents are incorrect a new study needs to be conducted and reviewed with the findings made public.	habitat integrity in recovery of the species, equal priority is given to both occupied and potential habitat OHV compliance monitoring. Response 4: Alternatives A – C still allow for OHV use within the Serpentine ACEC at or similar to those prior to the emergency closure, therefore, monitoring would continue at current levels. RESPONSE 5 and 6: Ryan O'Dell, the BLM Hollister Field Office Natural Resources Specialist (Botany, Soils, and Paleontology), holds a collection permit (TE163671-1) for *Camissonia benitensis* issued by the USFWS to collect seed and tissue of species, conduct research studies involving the species, propagate seed of the species within a horticultural setting, and make introductions of the species into potential habitat at specific locations as approved by the USFWS. The purpose of the program is recovery and eventual delisting of *Camissonia benitensis*. Introductions are specifically identified as a recovery action for the species in the Recovery Plan (page 69): "3.3.2 Continue population introduction research." The USFWS has stated under that recovery action that "the current number of occurrences may be too few for recovery of the species," suggesting that without introductions to bolster population and plant numbers, the species may not be a candidate for delisting. All introduction sites approved by the USFWS are located within previously identified potential habitat which was closed to OHV use prior to the emergency closure. All USFWS documents including collection permits and reports are public record and can be requested from the Ventura FWS Office. The specific action of "manage potential habitat for introductions" (See column "Management action: Maintain habitat integrity and diversity" in Tables 4.6-1 through 4.6-12) was analyzed in Chapter 4.6. Likewise, impacts of the introductions on recreation are analyzed on page 306 (Impacts from Other Management Actions): "Management actions under

Comment Code	Summary	Response
	Issue 8: If there is habitual trespass into closed areas the BLM need to address the individuals whom are trespassing and causing the damage to the habitat. This will require the BLM to actively patrol the known sixty-four suboccurrences during high use times. It also is important to educate the users of the CCMA through signage and personal contact through LE and responsible OHV user groups. Other OHV land managers have used these methods with outstanding results. Closure of the entire CCMA because of trespass in a select few areas is unacceptable. If the BLM is not capable of managing the resources in the CCMA or any lands they are directed to maintain there needs to be an overhaul of the agency with the pubic fully involved or the CCMA needs to have an agency that is capable of sustainable management of the CCMA.	Biological resources may preclude recreational activities at certain times and locations. This includes restricting recreational activities . . . near newly re-established vegetation. These restrictions are generally limited to very small areas, and may or may not be limited to a certain time frame, depending on the Alternative. While restricting recreation to a reduced area, even temporarily, would create additional burden on the surrounding recreation areas, the intent of these restrictions is to enhance the biological or ecological resources in the area." The program is being conducted by Ryan O'Dell, the USFWS collection permit holder. Ryan holds a BS degree in Plant Biology and an MS degree in Soils and Biogeochemistry, both from University of California, Davis. He has conducted extensive studies focused on plant adaptation to- and revegetation of serpentine soils since 2002. RESPONSE 7: Potential habitat mapping is based upon the complex interaction of topographic position (as related to stability in fluvial system), slope, soil development, and vegetative cover. Ryan O'Dell maps the habitat while on site and then draws it in GIS. See Response 1 above with respect to definition of potential habitat. RESPONSE 8: It is exceedingly difficult to catch the individuals responsible for trespass into closed areas. In order to cite them for trespass, they must be caught "in the act." BLM LE does their best to patrol CCMA, but they cannot patrol the entire 75,000 acre area 24 hours a day, 7 days a week. It is the OHV recreationist's responsibility to know the rules of the area they are riding in. Non-compliance Closure Levels and Thresholds were established in coordination with the USFWS. The BLM has the authority to close areas due to considerable adverse affects to natural resources from off-road vehicle damage under federal regulations 43 CFR 8364.1 and 43 CFR 8364.2 as stated on

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		pages 633 and 634. Notification of the closure to the public is stated under regulation 43 CFR 8364.1 on page 634 and includes closure posting at or near the area the closure applies, the local BLM office, and publication in the Federal Register.

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IND-COM-37	It is my hope that the BLM will respond to the public wishes, and completely reopen the entire CCMA roads and trails to all recreational users. If not, I hope some compromise may be reached that at least will keep Clear Creek Road open to all vehicles traveling between New Idria and Coalinga Roads, including street-legal motorcycles. Some of the draft RMP's alternatives refer to allowing road access "limited to full-sized vehicles," however the term "full-sized vehicle" is never defined. My touring vehicle of choice is a BMW R100GS, a full-size highway-legal touring motorcycle. I fear that limiting access to "full-sized vehicles" may be implemented in practice as prohibiting all motorcycles. Discussion with BLM staff has indicated that "full-sized vehicles allowed" is BLM-speak for "all motorcycles prohibited."	Refer to Common Responses Section 3D.
IND-COM-38	My family has ridden off-road motorcycles for over 40 years and would like to continue to do so. The riding areas I grew up with are being closed one by one and it is making it difficult for me to pass on this family tradition with my children. Off Road riding is a great family sport and it keeps my children away from Play Stations, Wii's and other couch-potato activities. A great weekend of riding builds confidence, brings our family closer and gives my children a healthy outdoor experience.	Comment noted.
IND-COM-39	**COMMENT #1** Nothing presented so far in the Health Risk Assessment demonstrates a severe risk for anyone other than motorcycle riders and other ATV riders who spend a lot of time ripping up the hillsides at high speeds. The "Weekend hunter scenario" (which includes campers, hikers, rock collectors) can make 5 visits per year under No Action conditions, **and the mean risk is still within the acceptable risk level of 1x10-4 excess cancers.** If the outlier data points (two points were anomalously 5 and 10 times the value of all the rest of the data) are excluded	Refer to Common Responses Section 1C, 1D, 2A, and 3A.

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	from the calculations (per EPA Guidelines), the risk would be even less! CONCLUSION: That **means BLM's own Health Risk Assessment does not support any reason to exclude anyone other than the motorcyclists/off road riders ("motorized sports").** **COMMENT #2** The proposed alternatives offered to the public were extremely limited in number and scope. With the number of components which go into a single alternative listed in the draft management plan, the universe of potential alternatives could number in the dozens using the various combinations of individual components. The alternatives were clearly "cherry picked" by BLM to give FALSE OPTIONS to the public, in order to justify BLM's preferred alternative of severely restricting public access. **OBVIOUS SAFE ALTERNATIVES WERE EXCLUDED FROM PUBLIC CONSIDERATION**. **COMMENT #3** One such obvious Safe alternative excluded from public consideration by BLM includes: 1) move the motorcyclists out of the serpentine area to new designated area in the Clear Creek Management Area 2) **surface the access roads with inexpensive Chipseal to reduce airborne asbestos by 98%**** 3) Place speed limits on unpaved/untreated roads 4) Pave/treat campground roads and import clean fill dirt for the campground pads. 5) **allow unrestricted non-motorized sports access**. 6) Keep all Roads open. My alternative will reduce the SUV risk from driving in on access roads by 98%, and the Camping risk by 98% (thus reduce the total risk in the "Weekend Hunter Scenario" by 98%). 1x10-4 / 98 = 1.02x10-6 risk = approximately 1 in a million excess cancers = **unrestricted land use per Federal EPA guidelines (as referenced in the BLM's Clear Creek Health Risk Assessment).** **per studies performed by Cal/EPA Department of Toxic Substances Control **COMMENT #4** Public access on existing roads must be preserved. Therefore alternatives E, F, G are not acceptable.	

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	COMMENT #5 As usual, BLM in typical government fashion, is going from the most destructive land use (a motorcycle park) to the most protective (closing roads and restricting public access), <u>with absolutely no consideration to a moderate and safe middle ground.</u> (Therefore alternatives E, F, G are not acceptable). **COMMENT #6** I want to review the "Responsiveness Summary" to see what BLM has to say regarding each of the public comments submitted.	
IND-COM-40	Everything has a risk. <u>Post your findings on a sign but do not close the area</u>.	Refer to Common Responses Section 3A and 3D.
IND-COM-41	Refer to Comments BRC-FORM-LTR	See BLM responses to BRC-FORM-LTR.
IND-COM-42	After reading the proposed Alternative's A-G of the CCMA RMP/EIS **<u>I strongly urge the adoption of Alternative A (Current Management/No Action Alternative).</u>** This is the only Alternative I feel appropriately balances recreational needs and environmental protection resulting in responsible land management. I was raised in New Idria and spent decades hiking, riding, hunting and exploring the vast backcountry surrounding it. As a small boy I swam in handmade swimming holes in San Carlos Creek, Clear Creek and Sawmill Creek on hot summer days with my family and friends. As a young man I spent every spare minute riding my motorcycle around the unlimited trails and roads in Clear Creek and the surrounding backcountry, year round. I still have a vested interest within the San Carlos Bolsa drainage, as my family owns land in that area. Although I no longer have time to explore the surrounding areas as I once had, I'm very familiar with traversing the various terrain characteristics on foot as well as by vehicle, under all weather conditions. I've experienced firsthand the effects of vehicular scarring of pastures and hillsides by motorcycle's, ATV's, and 4 wheel drive's. My family and I have spent thousands of man hours over the past 40 years repairing and preventing erosion damage caused by these vehicles that stray off of	Refer to Common Responses Section 3D and 4C.

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	the managed riding areas and end up in the San Carlos Bolsa. In reading the CCMA RMP/EIS, it is obvious that a reason-able amount of consideration has been given to protecting the environment and ecosystems scattered about the ACEC zone. It also identifies the various naturally occurring health hazards within its boundaries and references studies conducted by various authorities closing with the 2008 EPA study. That study concluded that the asbestos exposure exceeds the "PEL" under all but foot travel. Taken at face value, the EPA study would be alarming to most of the misinformed public. Disappointingly though, I found only generalized environmental or public health statements pertaining to the Cantua zone. This zone, under the BLM"s preferred alternative E, is proposed to be opened to year round vehicular access as well as under alternatives D & F to varying degrees. These alternatives are not only inconsistent with the growing emphasis on environmental conservation but a complete reversal of status for the majority of the zone. The San Carlos Bolsa drainage has had restricted vehicular access for almost 100 years. This limited access has successfully preserved its fragile native environment from irreparable public abuse and misuse. As mentioned previously, I've explored most of the area now known as the CCMA under all surface conditions. The Serpentine areas along Clear Creek and San Benito Mountain were some of the best riding areas in the state, under all conditions. The shale and clay areas around Samson Peak, Santa Rita, Lion's canyon and the San Carlos Bolsa were avoided during the wet weather, especially the Bolsa and Cantua areas. Those two areas are difficult to traverse (even on foot) during wet conditions. Over the years numerous vehicles have been stranded, damaged or lost in the back country, with the occupants having to walk out to safety. There may still be two new 1974 Bultaco motorcycles somewhere in the bottom of Lion's canyon. The riders were found after two days of walking out towards I-5 and never returned to retrieve their bikes. During the dry months the threat of wildfires are of high concern due to the tall grasses and extreme dry conditions typical of the Bolsa and Cantua areas. Currently managed grazing by the Martin ranch help reduce the fire danger annually. But with the reduction or elimination of grazing leases that will end. In addition to	

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	that a large part of those areas are choked heavily with brush making the open grassy pastures even more tempting to venture upon. **The adoption of any Alternative that opens up outlying areas currently having no public vehicular access is ill advised and irresponsible land management.** Therefore, I strongly support Alternative A (Current Management/No Action Alternative) and will vigorously oppose any other proposed Alternative that jeopardizes almost 100 years of preservation and ecological protection provided to the San Carlos Bolsa and Cantua areas.	
IND-COM-43	Clear Creek is one of the finest riding areas in California. I work in several buildings that contain asbestos and no one seems to worry about this asbestos as an issue. I want to ride at my own risk. Currently, with Clear Creek closed this causes Hollister Hills to be overly packed. Hollister Hills must turn away riders and close down when it reaches capacity. Clear Creek should be maintained as all open. The barren hills have been barren for over 100 years before bikes and quads were ever invented. With Clear Creek closed, my children are unable to further their riding skills. We have lost the National Hare Scrambles that were held at Clear Creek which is a major monetary loss for San Benito County. I have not had proof given to me that any rider at Clear Creek has gtten asbestos poisoining or cancer. The other problem is that the drug growers will take over Clear Creek. I am more worried about these criminals causing more damage. If riders are allowed then BLM will have many more honest pairs of eyes. The BLM never sought out any business comments on this closure until February 22, 2010, and BLM only invited 21 “important” businesses to the economic impact meeting. The cimment time for a business was only a total of 8 working days. Since May 1, 2008 sales at Zoom Cycle Accessories in Santa Clarta CA have dropped by 35-40%. The economic impacts is huge. We have been in business since 1971, but our store chance of closing is very high.	Refer to Common Responses Section 1F(i), 4B, and 4D.

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	Businesses here in San Benito County have suffered greatly. All sales are down, purchases of gas, food, supplies, and lodging are down, taxes taken in are less and that just because a few to the take CCMA from all the people. The BLM does not know the actual impact of sales and sales tax revenue losses. [By commenters estimate, approximately] $1,080,000 in lost sales tax revenue/year is occurring now.	
IND-COM-44	Refer to Comments BRC-FORM-LTR	See BLM responses to BRC-FORM-LTR.
IND-COM-45	I am a recreational rock collector and I am quite disappointed with the recent direction access to Clear Creek has been going. Insofar as the possibility of asbestos exposure in the area: we smoke cigarettes with a label on the packet, we drink alcohol with a warning label, we enter public areas and use suspected cancer causing products that are labeled so - why can't we use Clear Creek by putting up a notification sign or having us sign a disclaimer upon entry?	Refer to Common Responses Section 2A and 3A.
IND-COM-46	Please reverse your direction as your intended closure of the clear creek riding area. Using the natural Asbestos that is the same as in Eldorado's County. Placer ville and Eldorado's hills area to close this area to ohv is a cop out on doing your job to manage the area for the public not against them..Ohv has invested lots of our money over the years to support the area... If you intend to close it be prepared to pay back the money you have used or open an equally sized area in Northern California to Ohv... Your choice... Ed Santin AMA/d36 offroad congressman	Refer to Common Responses Section 2A, 3A, and 3D.
IND-COM-47	Refer to Comments from Organizations: ORG-TMC Numerous pages and page numbers are missing. Missing Pages are #17 and # 584. Missing Page Numbers on the page are #'s 129, 218, 222, 284, 294, 303, 321. and 475. Numbers missing from back facing side of the page are (changes page number sequence) #'s 32, 33, 637, 659, and 691. Correct page numbering for a more professional looking document. Put any information that might of been on missing pages back into the document.	Refer to BLM responses to ORG-TMC. Refer to Common Responses Section 1G.

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IND-COM-48	Recreation areas are closing with no regard to the social costs of the kids. Instead of going out riding and camping they are stuck hanging around the local skate parks or worse sitting in front of the tv. I want my kids to have the same or better recreation access as I have enjoyed in the CCMA. To kick us out you should have to show us the trail of dead bodies.	Refer to Common Responses Section 1F(i) and 4D.
IND-COM-49	1. Every American citizen, and visitor, deserves the right to enjoy PUBLIC LAND to the fullest, without being herded by overzealous government agencies into narrow, limited pathways as in Alternative E 2. Alternative A is the only option that is consistent with BLM's stated mission to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations. Please do not try to define or limit the ways in which I can enjoy my public lands. 3. How does the asbestos risk translate into a closure of Public Land??? Warning labels on alcohol and tobacco are deemed sufficient by our society to address the risk posed – these products are not banned. Safe sex is promoted by our society, yet the practice is not banned. California buildings that contain various carcinogenic materials bear warning labels – but continue to be open to the public. I dare say that more death and disease can be attributed to such things, but they are permitted with only a label or sign to explain to the public – proceed at your own risk and responsibility.	Refer to Common Responses Section 2A, 3A, 3D, and 4A.
IND-COM-50	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-51	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.	Refer to Common Responses Section 3B.
IND-COM-52	I am [concerned] about the future of the Clear Creek Management Area, and in particular, public access of Clear Creek Road. Since 1970 I have enjoyed my weekends and vacations spent at Clear Creek. Over these many years I have brought my family, as it grew to experience the primitive camping and teaching my children to ride. I remember the camp fires having with my friends and family enjoying just one facet of this great state of California.	Refer to Common Responses Section 3D.

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	The complete closure of Clear Creek has prevented any future plans of this type of recreation. It's all the more frustrating to hear that this is supposedly being done in my best interest, for a risk that is negligible considering the limited exposure, if it indeed exists at all. My risk from a collision with a vehicle on highway 25 exceeds any risk of exposure to the air at CCMA. I hope that the BLM respond to the publics wishes to reopen the CCMA roads and trails in their entirety to all recreational users. If not, to at least keep Clear Creek Road open to all vehicles traveling between New Idria and Coalinga Roads, including street legal motorcycles as a suggested compromise. It is my sincere hope that all parties charged with this important decision base their findings in good scientific processes and truthfully apply the laws and regulations by which we live by.	
IND-COM-53	I would like to urge you to keep Clear Creek open . It is a source of entertainment as well as a place to just hike picnic or go rock hounding. As a concerned citizen of the area, I would implore you to reverse the decision you have made, concerning this wonderful recreation area.	Comment noted.
IND-COM-54	My mother's family settled in this region of California before 1910, and several of my relatives live there still. Please convey our thanks to the authors of the draft for the cogent analysis of the resources of CCMA and the public uses of them, for the realistic series of alternatives presented, and for the thoughtful analysis of the environmental impacts of each alternative. We feel that the 90-day period allowed for comments has been adequate. Hollister Field Office made it easy to get the documents. You mailed us the CD version because we were on an earlier mailing list, and you responded promptly when we asked for a paper copy. **Bar OHVs from the Asbestos ACEC** The analysis in the draft EIS demonstrates that the lands in the asbestos ACEC simply are not suitable for OHV recreation. The US EPA risk assessment shows that asbestos exposure exceeds acceptable levels. EPA found that dirt bikes and ATVs are the greatest problem because they raise a cloud of dust containing asbestos fibers, which are inhaled by riders and by other visitors. The most effective way to reduce asbestos exposure is to bar those vehicles.	Refer to Common Responses Section 3D. Thank you.

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	EPA's sampling method correctly reflects the way OHVs are used in CCMA. Although OHV groups have objected to sampling from a vehicle following in the dust cloud behind another vehicle, it reflects what many riders do, as can be seen from photos posted by Clear Creek riders on their own web sites. Even full-size OHVs such as Jeeps and ordinary automobiles can raise a dust cloud. In my travels on back roads all over the West, I've inhaled quite a bit of dust from cars ahead of me. (Thank goodness asbestos soils are rare.) On one popular Jeep route we saw dust a half-inch deep after a "Jeep jamboree" event had passed through. If full-size vehicles are to be allowed within the ACEC, they should be restricted to routes equipped with surfacing or dust-palliatives to prevent a dust cloud. **Benefits of excluding OHVs** The exclusion of dirt bikes and ATVs from the ACEC will have several important benefits for the public interest. The asbestos hazard will be reduced to a minimum because vehicles will not be raising asbestos fibers into the atmosphere. The closure of obsolete OHV routes will lead to restoration of natural conditions, healing of eroded surfaces, and re-uniting fragmented blocks of wildlife and plant habitat. Without OHVs roaring everywhere, Clear Creek will become more attractive to visitors seeking a quiet place to enjoy nature, see the spring wildflowers, have a picnic, go bird watching, go rockhounding, or go hunting. All these potential public uses have been discouraged by the dominance of OHVs in Clear Creek. We believe the highest value of lands in the ACEC is as natural wild lands, to serve the public as wildlife habitat, as watershed, and as a place for quiet forms of outdoor recreation. The serpentine area, which is also the asbestos hazard area, supports plant life specially adapted to the nutrient-poor serpentine substrate. The area could also be valuable for the endangered California Condor. The condor was reintroduced in 2003 at Pinnacles National Monument to the north of CCMA, and a pair of condors were observed nesting in 2009 at a high rocky cliff on a private ranch outside PNM. We urge BLM to identify potential condor roosting and nesting habitat in the asbestos ACEC and seek advice from the Fish and Wildlife Service and other specialists as to the best management for this purpose.	

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	Future access routes While we favor closure of the ACEC to all dirt bikes and ATVs, we suggest that a few routes for cars should be kept open for access to trailheads for bird watchers, rockhounds, botanists, and all who wish to enjoy the natural environment of this area on foot. We understand that California bird watchers may be submitting recommendations to BLM about specific access routes. Only vehicles suitable for highway travel should be allowed, used for transportation to the trailheads – not any form of OHVs driven for the sake of adventurous driving. We do not favor the "scenic route" described in Alternative E, involving new construction of the Spanish Lake road to Wright Mountain. Instead, we favor recreation access routes leading in from the periphery of the ACEC to trailheads where visitors can enter foot trails into the wildland areas. Some of the former OHV routes could be suitable for conversion to foot trails, where they comply with Best Management Practices. For wildlife and plants, it is desirable to have blocks of habitat where the center of the block is farther than 1 mile from the nearest route. For restoration of native wildlife habitat and potential habitat for the California Condor, BLM should provide uninterrupted larger blocks where passing OHVs will not disturb condors or other wildlife. The route networks in Alternative A, B and C are far in excess of any need for access to enjoy the natural features of CCMA – many OHV routes would be less than a half-mile from the next route, and few places would be farther than 1 mile from the nearest route. Alternatives D and E are better for wildlife and plant habitat, but they may not provide enough access to trailheads for visitors entering the area on foot. We encourage BLM to discuss reasonable trailhead access roads with groups representing nature watchers (birds, native plants, etc.) hikers, hunters, and rockhounds. In our view, the goal should be to maintain blocks of habitat larger than 1 mile across, to benefit the habitat and to escape the noise of passing vehicles. If there is a vehicle route every half mile, they are too close together. **Offroaders have other places to ride** OHV riders have complained that if the ACEC is closed,	

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	too many riders would be concentrated on a smaller system of trails in other places. BLM should disregard this factor, because OHV riders have no inherent right to ride on publicly owned lands without crowding. If they have bought a vehicle for which there are few places to ride, they must accept the consequences. The State of California operates eight state vehicular recreation areas. The counties run other sites as OHV parks. BLM operates the Jawbone area and several areas in the California Desert. Senator Dianne Feinstein recently introduced legislation (S. 2921) to give statutory sanction to five OHV recreation areas in the desert, namely El Mirage, Johnson Valley, Rasor, Spangler Hills, and Stoddard Valley. If necessary, crowding can be managed by adopting a reservation/permit system, like those used by the National Park Service to manage river trips in the Grand Canyon and backcountry visitors in high-demand sites such as the canyons of Zion National Park and the high country of Yosemite National Park. The Forest Service sets "trailhead quotas" to prevent crowding in a number of sites in the High Sierra. (See Inyo National Forest's trailhead quotas page at: http://www.fs.fed.us/r5/inyo/recreation/wild/quotas.shtml) Crowding on OHV trails is no excuse for keeping an unsuitable area such as Clear Creek ACEC open to vehicles. **Budget considerations** Others commenting on the draft plan and EIS have advocated many miles of routes for OHVs, without mentioning the budget implications. BLM has an obligation to conduct maintenance on every mile of vehicle route to comply with Best Management Practices (EIS, pages 643-647) to prevent erosion and prevent degradation of vegetative cover and wildlife habitat. In the ACEC there are extra costs because workers may be required to wear personal protective equipment and undergo decontamination after the work day. We should not ask any BLM employees to jeopardize their health by working on asbestos soils without full protective measures. A network of 227 miles of OHV routes is described in Alternatives A and B, 185 miles in Alternative C. We doubt that BLM would have the budget to keep those large mileages up to BMP standards. A more modest	

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	system of access routes to trailheads would cost much less. The final decision should explain how BLM expects to pay for maintenance of the routes approved in that decision. **Federal Tort Claims Act** BLM may be exposed to litigation under the Federal Tort Claims Act and other pertinent laws if the final plan allows OHV riders to enter the asbestos ACEC. We did not see this issue mentioned in CCMA documents we have read. OHV groups have urged BLM to reopen routes within the asbestos ACEC under Alternative A. If BLM does that, the agency would be encouraging visitors to enter lands where BLM knows they will be exposed to airborne asbestos fibers. The risk assessment by US EPA establishes that excessive asbestos exposure may occur when ATV or dirt bike riders enter the area repeatedly and inhale dust raised by vehicles ahead of them. If a rider dies of asbestos-related illness 10 or 20 years later, will the survivors sue BLM for damages? A failure to protect the public against the known asbestos hazard in the ACEC could expose BLM and the Department of the Interior to costly claims.	
IND-COM-55	I'm very disappointed with the closing of Clear Creek. Instead of a two hour (one way) drive to Clear Creek, I'm now driving five and one half hours to Jawbone Canyon. Day trips are out of the question. Hollister Hills SVRA is far too congested. Metcalf is too small and is often closed. Stonyford and Cow Mountain are also too far away for day trips. I don't enjoy the terrain at Carnegie either. After reviewing the BLM Draft RMP/EIS proposals, **I think Proposal A is the most desirable**. I've been going to Clear Creek since the late '70s and know many others who have done the same. Nobody, including the BLM or EPA, has been able to find anyone who has ever gotten sick from asbestos exposure at Clear Creek. I'd bet a million dollars that more people have gotten hurt traveling to and from Clear Creek than from any asbestos exposure there. Perhaps it would make more sense closing Coalinga/Los Gatos Rd. This wouldn't be an issue if a suitable, immediate replacement of like size and terrain could be substituted	Refer to Common Responses Section 1F(i), 3E, and 4B..

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	for Clear Creek within a two hour driving radius. Fort Ord comes readily to mind. Isn't it being decommissioned from military use? They already have a race track and suitable infrastructure there.	
IND-COM-56	The land should be reopened as a OHV area with the continued policy of some dry season restrictions. To provide a potential safer riding area option, the development of the Cantue Zone for additional OHV use would be a desirable. The Clear Creek area has been know to be an Asbestos area well before it became a very popular OHV area. Automobile club maps I have seen from the 1960's and 1970's have the Clear Creek road labeled as an Asbestos Hazard. The use of back country areas always have some risk. Americans enjoy using their public lands for a variety of recreational uses that often put them in risk of life and limb. The function of government is to provide some basic services and protect our freedom. Government should provide information and let the people decide on what risk is acceptable to them. The idea that shutting down public land to protect the citizens makes as much sense as shutting down Yosemite National Park to protect us from rock falls, floods, lighting and falling from El Capitan etc. Far more lives are at risk in our National Parks than I found in any of the data found in the Draft Plan. If government starts to measure every risk that the public could face in public lands I am afraid that this is the beginning of the end of outdoor recreation. WE WILL ALL HAVE TO STAY HOME AND WATCH NATURE SHOWS ON CABLE TV. PLEASE KEEP OUR PUBLIC LANDS OPEN TO THE PUBLIC!	Refer to Common Responses Section 3A and 3D.
IND-COM-57	I do not believe we, the public, should be arbitrarily locked out of our public land because of a supposed but unproven health hazard. We, the public, should not have to prove that no hazard exists to get that area reopened. It should never have been closed in the first place unless you, the BLM, can unarguably and scientifically PROVE beyond any reasonable doubt that my health is significantly affected if I voluntarily choose to spend a couple of days there per year.	Refer to Common Responses Section 1A, 2A, and 4A
IND-COM-58	i think all will agree with me when i say that i feel that the option the blm has chosen is not fair at all. it seems that the focus of the decision is on the ccma only and fails to account for the bigger picture. for clarity i think it is important to distinguish between 'ohv' that encompasses	Refer to Common Responses Section 1F(ii), 1F(iii), 2A, 3A, 3D, and 4B.

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	all off road vehicles, and 'dirtbike' that is specific, like atv, utv, or suv. ccma is dirtbike riders's graceland, we dirtbike riders enjoy the scenery just as much as anyone else, but ccma is not yosemite. all non-bike users of the ccma could go elsewhere for their recreation of choice, or continue to use the ccma seemingly without conflict. we 'bike' users have no alternative to the ccma and to close us out while allowing atv/utv/suv traffic that creates considerably more of the poisonous dust you are using to do so is discrimanatory, and reinforces the opinion that the closure is not really asbestos related. human life in every way is detrimental to the ideals of a 'natural' state. by letting bikes ride at ccma and thereby concentrating our 'damage' to an area already damaged, and not well suited for any other purpose not already enjoyed at ccma, the greater good is served by preventing that 'damage' elsewhere. please consider changing the outlook of the blm closer to the other end of the options scale. by refusing to have a peer group review any of the science, by refusing any information that does not suit the closure, by spending two years on this process without considering any source other than the epa, the blm has continually shown complete disregard for taxpayer money or green sticker money, the public opinion, desire for accuracy, public trust in a govenment agency, or logic and facts concerning the ccma closure and risk.	
IND-COM-59	In California, our recreation areas get smaller and smaller, but the amount of riders just keeps increasing. Funneling these tax and fee paying recreation enthusiasts into smaller riding areas creates more danger from head ons and over usage of the trail systems. We all know that this “reducing airborne asbestos emissions” is a cooked up LIE from some non-rider. If you are so worried about asbestos, put up a sign and let us ride, we all know one big windy day does more damage then a thousand riders can do in a year. If a person is worried about asbestos, they can wear a respirator	Refer to Common Responses Section 4A and 4B.
IND-COM-60	1. There are many types of activities that could cause health hazards such as drinking alcohol and smoking cigarettes, yet those activities are not banned because it is not possible to determine what the specific health consequences would be for any-one individual. Like riding a motorcycle at CCMA, smoking and alcohol consumption pose a possible health risk but an informed, mature person may do so at their own risk.	Refer to Common Responses Section 1C, 1D, 1F(i), 3A, 3D, and 4A.

Comment Code	Summary	Response
	2. Asbestos is a hazardous substance, no one would dispute that, but how much do you have to be exposed to, to cause a measurable health risk? The CCMA RMP and EIS say that although asbestos hazards can be measured in other controlled settings, the setting at CCMA is intermittent and sporadic and therefore the health risk is uncertain. 3. There are no clear modes of action for asbestos induced disease and no threshold for cancer health effects, therefore the IRIS cannot be considered. 4: We are not able to measure the "non-cancer" health risks. 5: There are no available health reports on asbestos related illnesses from CCMA. If activity options A - F were put to a vote, I couldn't reasonably choose since I don't know what the reduced risk would be between them. How much safer would I be choosing between B and C instead of A? Or would I be out of my mind to choose any of the options. What would a reasonable man, considering this data, choose A or F? The problem is that no one can quantify the increase or decrease in risk between the two extremes. Is it a lot or a little? I think a reasonable man, would try to protect public land for the public, and not try to protect the public from the land without cause. It is important to reduce potential risk by reducing exposure, but should done so by being proactive not restrictive. For example, dust abatement on heavy traffic roads such as R1 and overnight camping areas. Better, more informative signage throughout CCMA to allow individuals and opportunity to decide the exposure level that is right for them, with their use patterns. Vehicle / equipment / riding gear wash facilities with showers and even vacuums. Provide and encourage overnight camping in areas of low or no asbestos to prevent / reduce asbestos exposure outside CCMA, Finally, I believe CCMA can be reopened for frequent use by a wide variety of interests without any more health risk that smoking cigarettes or drinking alcohol.	
IND-COM-61	Throughout the document the material of concern is defined as "asbestos". Asbestos is a manufactured product and does not occur naturally. There is no 'asbestos" in the CCMA. In the Executive summary alone, the word "asbestos" is used sixteen (16) times. The material related to asbestos that is present in CCMA is	Refer to Common Responses Section 1A.

Comment Code	Summary	Response
	chrysotile, which has different properties and effects on human health than asbestos. Not only is this erroneous subject of investigation inapplicable, the use of the word "asbestos" is politically misused to create hysteria and an invalid description of the conditions that exist at CCMA.	
IND-COM-62	My [husband] and I wish to express our adamant opposition to the closure of Clear Creek. We support Alternative A. We feel that if cost is an issue, the Bureau of Land Management should charge entrance fees. If asbestos is an issue, those same individuals should be required to sign waivers upon paid admission. We respectfully urge you to support Alternative A, and thank you for your leadership.	Refer to Common Responses Section 3A and 3D.
IND-COM-63	The CCMA was once a fun beautiful fully sustainable trail system for all recreationist. It had access for all, including disabled. I think that rock hounding, mountain biking, dirt biking, hunting, hoarse backing, and hiking are all excellent ways to see this land and I know they can all do so on the existing trail system. There has never been a single case of cancer attributed to CCMA recreation caused by chrysotile, Or from the actuall mine workers or families and they saw exposures that no recreationists would see. We support the environment but also feel that a park such as CCMA can and has been sustainably used for generations.	Refer to Common Responses Section 1F(i).

IND-COM-64	The BLM has omitted a critical piece of information from the Clear Creek Management Area DRMP/DEIS: The Clear Creek Management Area Asbestos Exposure and Human Health Assessment did not achieve the goal of providing BLM with information on asbestos exposures from typical CCMA recreational activities. Instead, the *Clear Creek Management Area Asbestos Exposure and Human Health Assessment* provided the BLM with information of atypical CCMA recreational activities due to the recreational activity exposure calculations being skewed towards dry (summer like) conditions. In calculating asbestos exposures levels for recreational activities (motorcycles jeeps, hunting, etc) within the Clear Creek Management Area the EPA used several samples gathered over four different testing periods. The four different testing periods were designated by three different conditions, “dry” (two dry testing periods), “moist” and “wet”.	Refer to Comments from Organiztions: FOCCMA-ORG The EPA risk assessment indicates that the exposure levels that exist during the summer dry season also exist during moist conditions. While the soil moisture content during the September, 2004, sampling event was zero percent, soil moisture content during the November, 2004, sampling event ranged from 1.8 to 22.4 percent, with a mean of 8.7 percent. The November (i.e. “wet”) sampling occurred within a week of the CCMA receiving

	Many of asbestos exposure calculations used an inordinate amount of "dry" samples despite known visitor use of the Clear Creek Management Area being at its *lowest* level during "dry" conditions. Subsequently, due to the inordinate amount of "dry" samples used in the EPA calculations the amount of "wet" samples was dramatically reduced despite known visitor use of the Clear Creek Management Area being at its *highest* during "wet" conditions.	nearly one inch of rainfall. However, the November asbestos exposure concentrations were of a similar magnitude to asbestos exposure concentrations found during the September, 2004, sampling event.

IND-COM-65	Subject: 2008 EPA Document References Referring to the Following Paragraphs: 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. Referring to the Following Paragraphs: 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. 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	Refer to Common Responses Section 1C, 1D, and 2A.

	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 identifies as tremolite, actinolite, or another amphibole asbestos mineral. There is an **emerging consensus in the scientific community** that amphibole asbestos may present and 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 bin specific analysis of asbestos fibers which would separately account 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. Recommendaitons: The Draft EIS needs to be edited to remove the bold statement references as it is false. 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". 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.	
IND-COM-66	I am writing to voice my support in reopening Clear Creek to OHV use. OHV land is shrinking everyday while it's popularity grows. This makes the areas that remain over crowded leading to dangerous situations and more difficult maintenance challenges. Instead of closing OHV land we should be working on creating more opportunity for mixed use so that	Refer to Common Responses Section 4B.

	famillies can enjoy this together.	
IND-COM-67	I am in support of opening up the entire clear creek area for offroad vehical enjoyment as it was. There are many dangers in this world and the excuse of asbestos is a sham and an effort to take away land from the public.	Refer to Common Responses Section 1G.
IND-COM-68	Once again I am writing in response to a proposed land closure that will prevent family recreation on public lands. The Clear Creek land closure seems to be based on bad science and short sighted management. Even the BLM admits that no known case of health injury has occurred in the years of OHV use in the Clear Creek area. What is the greater risk, families riding motorcycles and atv's together, or kids sitting home playing Grand Theft Auto or World of Warcraft in front of a computer screen? I won't belabor the point with a form letter, rather I will just say this: 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.	Refer to Common Responses Section 1F(i), 3A, and 3D..
IND-COM-69	Please apply massive doses of common sense to the issue of closing Clear Creek to OHV enthusiasts. I've been attending these and similar meetings regarding this subject for about 20 years now. It is very disheartening to go through this over and over.. realistically, what are the compelling reasons for the closure? Asbestos poisoning? Where are the thousands who have dropped dead after all of these decades? Protecting the environment? Clear Creek looks the same to me as it has for 25 years that I've been enjoying it, hasn't really been destroyed much. Preserving resources? Please specify which resources we have depleted by enjoying this wonderful recreation area. Protecting wildlife? Please specify which species have been endangered and provide the empirical evidence. Seriously, this is a great, big, wonderful playground that has been enjoyed by countless thousands for many decades.	Refer to Common Responses Section 2A, 2B, and 3A..

IND-COM-70	I am a firefighter/emt in San Juan Bautista where i currently live and I have been riding @ Clear Creek since I was born. My father has been riding there since he was a child and his father use to hunt there as well. The closure of the area has made a huge negitive impact at other ohv parks due to overcrowding and has made a huge negitive economic impact. There was NO PUBLIC DUE PROCESS in the closure. The EPA has said they did not close the area the BLM did. If there is a deadly amount of asbestos then show us the # of people with cancer directly from Clear Creek. People have known the risk for years and still ride out there so why fight it or close it down Make Liability Forms Be Signed at the entrance and its a win win situation. PLEASE REOPEN THE LAND	Refer to Common Responses Section 1F(i), 3A, and 4B.
IND-COM-71	In regards to the Clear Creek Management Area Closure. I as a motorcycle shop owner and family motorcycle rider strongly oppose the closing of this recreation riding area. We need places such as this for our industry along for out young children and youths. The jobs lost in the state of California alone is rising directly from the fact that Your Organizations are striping the desire of new buyers,current owners, of sales, service and repairs due to the fact Californians have NO local places to enjoy anymore. This is WRONG make a stand for the "blue collar" back bone of this state!!!!! Keep this open, support our communities motorcycle business and our job force. Its clean by this state of current depression more harm than good is being done.	Refer to Common Responses Section 3D and 4D.
IND-COM-72	I have given this great thought & have a lot of ideas & opinions & have studied your A through G [Comparison of impacts to Recreation Resources] draft. There is the economic impact in these times of prolonged economic distress & ensuing stress, the need for a place to be able to go in a tank of gas to pursue one's choice of recreation & stress reduction for oneself & ones family & friends. This area is not only diverse but close proximity to the huge population of the San Francisco Bay Area.. We have treasures in our National Parks in California but they are touristy [expensive]. & crowded. The three gateway cities to get to Clear Creek are Coalinga off the I-5 ;Hollister & King City off the 101. All cities could use the money from visitors in the form of gas, food, ice,motels, other services & people deciding to explore the area further for more frequent & longer stays giving a boost to the economy & provide jobs.for the local economy.One only has to look at all the news sources national & local to see the escallating anger and rebellion against all ' government' now	Refer to Common Responses Section 3D and 4D.

	erupting into killings, not just protests. America has always been the land where we agree to disagree but now violence is not only happening all the time but more frightening is the ' accepted way of the times' attitude; it is a sickness that need to stop & people need a place to heal & seek relief from the horrific stresses of our times. The BLM has a unique opportunity to provide the citizens & visitors with an outlet of diversity for all pursuits of recreation, defuse a big segment of society stress with all that Clear Creek offers while giving the local economy a boost. I know your excuse is asbesiosis but not only is that something that has been presented as a warning health hazzard but we can & do have the right to say we have been informed & therefore it is with informed consent that we all chose to go to all areas of Clear Creek knowing the risks involved. The risk of being killed by road rage or being shot as a drive by is escallating very rapidly & the effects are immediate re the 20 to 30 plus yeat wait for asbestosis to be a diagnosis . Also precedent has been set by the sheriff & police & fire dept, when they ask[tell] people to leave from immediate danger ie fire, flood, rock & mud slide & they defy orders they sign a waver. My opinion is reopen Clear Creek Recreational area to Hiking, Hunting, Rockhounding, Firearms & Target shooting, Camping & staging in the whole area & some areas for the OHV people. This is where I found the answer that backs up my response/ request and I quote. The BLM is responsible for stewardship of our public lands. The BLM is COMMITED to manage, protect & IMPROVE these lands in a manner to SERVE THE NEEDS OF THE AMERICAN PEOPLE. Management is based upon the principles of MULTIBLE USE & sustained yield of our nations resources within a framework of environmental responsibility and sientific technology. These resources include RECREATION, RANGELANDS, TIMBER, MINERALS, watershead, fish & wildlife habitat, WILDERNESS AIR & SCENIC QUALITY AS WELL AS scientific & Cultural values [I capatilized the criteria I feel Clear Creek has to offer] Hopefully you are all familiar with this;, as it is your job description your Mission Statement as government employees of , WE, THE PEOPLE of the UNITED STATES of AMERICA. Thank you as I am anxious to pursue my recreational activities of rockhounding & just being on the mountain in Clear Creek soon.	

IND-COM-73	I have been going to this area since 1965. Since that time I have Hill Climbed, Flat Tracked, and participated in Moto Cross. This area was chosen by us because at that time nobody cared what we did there. It was an AMA sanctioned Rack Track. That track kept myself and buddies off the street and out of trouble. If you people who control the PUBLIC'S LAND keep it up there will be no place for kids and their families to recreate with ATV'S and Motorcycles. It will become the private property of Enviro-Mentalists. Make the right decision and at the same time help our economy along by allowing Clear Creek to be used as it was intended. The DEIS does not contain any Economic Effects of the huge impact to regional economy like gas stations, restaurants, lodging, camping supplies, etc. This must be added to the DEIS with supporting documentation. Why during the worst economic downturn in California History does the government fly off the handle because some college student had it brought up in a freshman enviro-mental studies class. Between Fed, State, County, and city regulations being put into effect by #1 WQCB, and the AQCB at the State level and now the Feds what do you want everybody to do. There aren't enough street corners to sell shoes on and even then most of the street corners are a haven for Drug sales. The Environmental Study for Clear Creek Management Area failed to take into account the many studies showing Chrysotile should not be grouped in with other types of asbestos fibers when looking at potential carcinogenic properties.	Refer to Common Responses Section 1F(ii), 3D and 4D.
IND-COM-74	As an OHV enthusiast (and father of 2 kids) - you have plenty of comments from many OHV constituencies outlining the flaws in your draft RMP for CCMA and I don't need to add to them here (but I support all the noted flaws that have been pointed out). My only comment is that you omitted one other Alternative - and that is to reopen CCMA year-round. Comment #1: Please add as Alternative A+ (or however you want to designate it) into the draft RMP a statement that allows for CCMA to be opened year-round to all users.	Refer to Common Responses Section 3E.
IND-COM-75	The report filed by the BLM is based on an EPA study originating from mostly theoretical analysis of potential asbestos exposure hazards. Yet, despite 50 or more years of use, there have been no documented cases of	Refer to Common Responses Section 1F(i), 2A, 3A, 3C, and 3D.

	any asbestos related health problems, correlated with recreational exposure at Clear Creek. The BLM and EPA must not reference reports/studies that are clearly not supported by actual and verifiable health cases at Clear Creek. It is an absolute fact that there are no cases of illness associated with the use of the CCMA. OHV recreation has clearly been the predominant activity by past visitors at the Clear Creek Management Area over the last several decades. Sadly, the BLM's preferred alternative selection, makes no provisions for OHV use at all. This represents a complete reversal of the current and historical use in the CCMA. Selection of a preferred alternative must include at least SOME OHV use provisions. Preferably, selection criteria would give emphasis to public travel on trails and roads as opposed to eliminating it completely. Vast acreages of BLM land directly adjacent to the Clear Creek Management Area, suitable for OHV recreation, could potentially be opened. Omission of such an alternative in the DEIS completely ignores the thousands of users who are crying out for a suitable place to recreate responsibly in their chosen pastime. It is virtually impossible to travel in the CCMA without some form of motorized transportation. The terrain is rugged and forbidding with numerous elevation changes. Due to health issues, many users would effectively be locked-out of access, without a provision for motorized travel. Public lands administered by the BLM, must remain accessible to all users, especially those who are unable to hike/walk for hours on end. Rock hunting, camping, bird watching, etc., would be impossible for disabled or otherwise "less than fit" members of the public, without motorized access. OHV use, especially quad, jeep or dirt bike, leaves the smallest footprint, especially when that use is restricted to established trails/roads. Horse back riding is simply not practical for most people, considering the cost, difficulty and strenuous nature of climbing aboard a large animal. Concern for our disabled veterans, elderly, obese and chronically ill members of the public must be represented in the BLM's choice of preferred alternatives. Anything less, is a form of discrimination.	
IND-COM-76	Recently I just celebrated my 68th birthday. For 35 of those years, I have been riding at Clear Creek and to this date have not suffered any complications from asbestos related diseases/complications. Another friend, 75 years old, has been riding there over 50 years!! No	Refer to Common Responses Section 4A and 4B.

	illness and or symptoms of mesothelioma. We have outlived your 30 year predictions of the potential hazards and remain living witnesses to the erroneous assumptions/conclusions presented by the studies conducted by "government Representatives". For decades, Clear Creek has been a source of great pleasure to tens of thousands of off-road enthusiast comprised of all walks of life. These same thousands also contributed to the local business community thru their purchases of gas, camping equipment, food, drinks, etc. Also, many of those thousands of riders are now restricted to riding in a small park south of Hollister, which you know creates additional stress on the park. This is a great opportunity for the government to display it's claim to be the "servants-of-the-people" and re-open Clear Creek.	
IND-COM-77	I am greatly saddened and angered to learn that the Federal government, at the behest of a lawsuit from environmentalists, has decided to permanently close the Clear Creek area to pretty much anything of value including mineral collecting. This flies completely in the face of more than 100 hundred years of precedent regarding the human use of the entire area! This decision is a ridiculous decision, an outrageous decision, a decision that is socialist/Green Party/Progressive in its agenda! This is NOT a park where talking about. It is land that has been used by humans for a long time AND NOT AS A PARK! THAT IS THE PURPOSE OF THE BLM--TO NOT BE A PARK! IT SHOULD STAY THAT WAY! As for mineral collecting, which I have done from boyhood, what do you think will happen to the rocks in the area? Let me clue you in: They will disintegrate eventually, due to erosion and flood tumbling and become sand. This means all the beautiful jade and plasma quartz will NOT be there for us to enjoy anymore. As for the endangered species: A dry year, common in California, and a single lightning strike could render your concerns non-existent from the resulting wildfires! At least with OHV use you can temporarily close it during the dry season. Finally, I am sick and tired of the government trying to protect me from things I don't need protecting from. I	Refer to Common Responses Section 1A, 2A and 3D.

	am, as an college educated citizen, well aware of the potential health impact of asbestos/serpentine soils. Does that mean your going to close most of the northern coast of California too? Pretty much all serpentine has asbestos embedded within it. You guys need to back off and let ME decide whether I am willing to take the SMALL risk of being in the area, during the wet season, for a few hours of collecting minerals. As for hiking: Few of the yuppie progressives in the San Fran area are going to bother coming down to such a hard core wilderness area. They'll all be too scared of the asbestos not to mention the Valley Fever mold.	
IND-COM-78	The DEIS is very long and difficult. The rationale for the choice of alternatives is not clear to me. I have long been interested in the wilderness potential of the Joaquin Rocks area, and also in the possibilities for quiet recreation that would be available in the serpentine ACEC if it were not overrun with dirt bikers, and I am glad to see recognition of the value of such recreation. But I would hate to see restrictions on access to the area on the main roads, as appears to be contemplated under all of alternatives D-G. It appears that elimination of off-road activity in the serpentine area would address most of the health problems from asbestos without having to limit the number of visits per year by hikers, rock-hounds, birders, botanists, and others. I am not unalterably opposed to the possibility of opening up other OHV routes in the CCMA, but alternative D could open up OHV routes closer to the Joaquin Rocks than the former road closure at Wright Mountain. I am violently opposed to any such new routes. Since the possible routes are not defined in the DEIS, if this alternative were to be adopted, we might be faced with new routes that would be subject only to an EA. This is not acceptable. I think it might have been possible to formulate other alternatives; it is difficult or impossible to tell from the draft document. I would therefore request that the comment period on the DEIS be extended for another 90 days, which I believe is also what some of the organized OHV groups are asking for.	Refer to Common Responses Section 3D.
IND-COM-79	I have been visiting the Clear Creek area since 1973, and would hate to see it closed. 1. It is an important area for OHV travel, with the net	Refer to Common Responses Section 3D, 4A, and 4B.

	loss of other areas when OHV use is growing 2. I think the danger of the asbestos in the area is overblown out of all the people I know no one has had any problems because of this area. 3. This area has some unique minerals found nowhere else. 4. All the work that volunteers have done over the last 30 years to keep this area open would be for nothing!	
IND-COM-80	The drop-in box had been removed to your car by the time I made it to the front desk this evening at the Santa Clara Convention Center. Regretfully, I arrived after the principles said their piece, but I surmised from the public comments afterwards that they disagreed with the validity, accuracy and honesty of the study upon which the environmental (draft) statement was crafted. I tend to agree that there are motives that may have swayed the study judging by the outright pathos and hyperbola alluded to off highway vehicle activity. There have been, what I call disinterested groups, meddling with the Clear Creek Recreational assets and public access to those assets. First evidenced by calling to fact that the rarity of the milk vetch in the Clear Creek area. That milk-vetch is a noxious weed to some, more commonly referred to as loco weed. Then only having succeeded in closing down a small portion, another "disinterested" group identified and sued in court over the hazardous naturally occurring material asbestos along with identified mercury mines in the area and I believe, calling parts a superfund cleanup.. That type of asbestos, to the best of my knowledge occurs throughout California and if hazardous to health, would prompt the state to erect "Prop 65" warnings at a bewildering density in cities and suburbs and countries. I believe other respiratory ailments such as silicosis occur at rates far higher than that assigned ailments identified with chrysotile inhalation. That being said, I believe folks that wish to tour that area, down wind of that area, or nearby areas should	Milk vetch does not occur in Clear Creek Management Area. Refer to Common Responses Section 1A, 1B, 1D and 2A.

	have to sign lifetime liability releases. But that could easily expand into all California residents and visitors also having to sign lifetime liability releases due to the uncertain nature of all the compounds that are floating about in our quite clean air. Clear Creek should have never been closed, partially closed or sections reserved for plants that are not in peril of extinction. Please open Clear Creek to off highway vehicles.	
IND-COM-81	At this conjecture in time I am absolutely dismayed. What you are proposing to do in the Clear Creek region with road closures affects not only myself but countless children, elderly, and infirmed. Many of us feel as though our government has "rolled" on us. Have you forgotten that many local families tried in vain to keep the Union Carbide Company out of this area when they announced their intention to mine asbestos? They (including members of my mothers family who were members of the Fawn Lake Deer Hunting Club) petitioned government to prevent what they knew would one day destroy the Clear Creek Watershed. Those men and women who served during WWII were well aware of the dangers associated with asbestos witnessing first hand ailments suffered by dock workers who handled the material. Our govenrment officials pretended to be ignorant of these facts and allowed a large mining compnay to come in and open up the asbestos deposits near Clear Creek. You see, our govenrment desired this mineral for military and aerospace applications more than it cared for its citizenry. Asbestos clouds wafted over the region despite guarentees that this would not occur. Now you turn around and try to blame off roaders and rock hounds for a problem YOU created! Nice try but I am not buying your feigned ignorance nor your bullying. Here is the bottom line. Your recomendations are too restrictive. Only the healthiest of Americans would be able to continue the passtime of rockhounding in this region. As I eluded to before, children, elderly, and infirmed would have no <u>reasonable</u> access. Even I would have difficulty (at age 55) hiking in from New Idria especially if I had to return to my vehicle the same day, and I used to run marathon! Rock hounding is strenuous and requires a great deal of searching- as opposed to a simple "walk in" and "walk out." Your bureau is not being <u>realistic!</u> Contained within the Clear Creek Unit are	Refer to Common Responses Section 2A, 3A, 3D, and 4D.

	WORLD CLASS collecting opportunities (Neptunite/Benitoite). Gem and mineral varieties found nowhere else in our state also exist here. Plasma agate would be an example of what I am refering to and what I have seen of the unique Clear Creek jadite found by members of the San Luis Obispo and Santa Maria Rock and Gem Clubs over the years is truly special! We can't simply run over to some place else and find material like this. Many of us middle aged rockhounds who have sat at the feet of of the old timers when we were first getting our own feet wet in the hobby believe that there still exists plenty of potential for completely new discoveries in this region. This will never happen if you continue to "lock us out" with suffocating laws, rules, and regulations. My Congressman, Wally Herger, continues to fight for multiple use classifications on Federal lands and he sends me updates regularly. Your spirit is not one of cooperation with the citizenry to find REAL SOLUTIONS but seems to me to be doing whatever it is that you intended to do in the first place, regardless! We the people, do not seem to matter! Quit playing into the hands of the well funded and powerful environmentalist lobbys and allow the minority groups like rock hounds to have a share in land use. Please consider giving us access (even if it is seasonal) to our beloved (sacred to many) rock collecting areas and permitting overnight use in areas deemed safe (there are areas where exposure is less). Remember that during the winter and early spring months asbestos movement is minimal (because of cohesion when the soil is wet). Commercial operations for Benitoite need to have the least restrictions as possible. I personally abhor the practice of "bringing material out to be screened." Americans deserve the right to see the actual strata material comes from first hand, how it is mined, and extract the material THEMSELVES from the tailings or fresh ore provided by mine owners! "Knott's Berry Farm" off location mining is an insult to rock and gem inthusiasts. You are lucky to have a business out there. Locally where I live, in this topsy-turvy economy, businesses are closing up right and left....not that you care about the economy. While I cannot attend any of the posted meetings due to a minute by minute family medical situation up in Oregon requiring me to be able to "drop everything and travel north," I really wish that I could. Hopefully enough individuals will show up or at least	

	respond by mail or email so that we ALL can reach some sort of accord. Despite what you might first be tempted to believe, rockhounds (and many off road enthusiasts) are more environmental than you would think. No, we are not going to align ourselves with most of the environmental groups due to their extremist views but a majority of us are CONSERVATIONISTS at heart. Every time I go out in the field I witness "environmentalists" enjoying nature but why is it that I am almost always the ONLY PERSON PICKING UP GARBAGE and PACKING TRASH OUT? What I am suggesting here is that you have plenty of room to negotiate with us and many strengths to build upon. Let's forge an agreement that we all can live with and be happy!	
IND-COM-82	Prior to the Bureau of Land Management (BLM) closing this area, they estimated that 78,000 people used this land annually for hunting, camping, rock and gem collecting, off-road recreation, hiking/backpacking, and other recreational activities. This area is also home to our State rock, serpentine; and our State gem, Benitoite. There are more than 40 other gems and minerals in the CCMA that have been collected by Rockhounds. The CCMA is the only place in the world where gem quality Benitoite and Fresnoite can be found. There have also been commercial mining operations, including a current Benitoite gem mine, within the CCMA. After attending the BLM's public hearing on January 13, 2010 in Coalinga, more questions were raised than answered regarding the rational for closing the CCMA. I have spent days researching why the CCMA was closed and I understand that there MAY be a potential health risk, however, now that we have been informed, I would like to exercise my right as American citizen to make an informed choice to use our public lands. I would be agreeable to usage fees and restrictions on access depending on weather. At most, access could necessitate the signing of waivers which knowledge the potential harmful effects; releasing liability of county, state, federal agencies. The BLM closed this area in May, 2008 in response to one (1) EPA asbestos exposure evaluation study. There has been no reported study of asbestos related diseases of miners who worked in the asbestos mines within the	Refer to Common Responses Section 1A, 1D, 1F(i), 1F(ii), 3A, 3D, and 4D.

	CCRA prior to their closure in the 1980's. For decades, hundreds of employees worked the various asbestos mines within the CCRA. No mention of a case study of these employees was made in EPA's report. Was a study completed? If not, why? An independent study conducted by Geologist E.J. Fowkes, PhD. and Archaeologist Ray Iddings in June of 2008 states that "…initial observations, pending formal mineralogical analysis, clearly suggest that the EPA's sampling route was highly misrepresentative of the vast majority of the New Idria (former mine within the CCMA) serentinite, and probably more representative of the commercial complex that supported 150 years of mining activity and the naturally occurring contact zones from which these mineable minerals were taken." The report goes on to state that "naturally occurring asbestiform amphibole was not found. However, historic ore processing equipment was found to contain potential asbestiform amphibole that had been imported into the area for commercial purposes." Their study found that the only potentially hazardous asbestos found was in the equipment imported to the area, i.e. pipe installation. The conclusion of another report published by 2004 Sage Publications, "Coalinga Chrysotile: A short Fibre, Amphibole Free, Chrysotile: Part V – Lack of Amphibole Asbestos Contamination", states "Direct analytical studies using the most sensitive methods, conducted over almost 50 years, have failed to find amphibole asbestos in Coalinga chrysotile. Further evidence that Coalinga chrysotile does not contain amphibole asbestos comes from human observations of workforces that mined and milled this material and of populations living on and near the ore body. To date, there has not been any evidence of an attributable excess of pleural plaques or mesothelioma in any of these individuals. Since pleural plaques and mesothelioma are causally associated with exposure to amphibole asbestos, their absence is therefore also consistent with the view that Coalinga chrysotile is not contaminated by asbestiform amphibole." Www.1800mesothelioma.com/asbestos-detail.htm defines the different types of asbestos and defines the chrysotile type found in the CCMA as the least harmful. So many of the references found regarding the chrysotile (aka: white, curly fiber, and short fiber)"	

	asbestos, as found in the CCMA, indicates that it poses a minimal health risk. As an adult citizen, I have experienced warnings from the government on the dangers of mercury in the fish, tobacco in cigarettes, alcohol use, etc. Yet, with all the studies to show that these may be harmful, they have not been banned. The government has warned that tobacco causes cancer, however they allow us to make the choice to smoke or not. Why is this any different? I feel this is a socially acceptable risk, and that I should be allowed to decide if I want to take it or not. Although we do not have lobbyists like the tobacco industry, let us have the right to make our own choice when it comes to asbestos exposure in the Clear Creek Recreation Area; do not take away my right to make an informed decision! Also, are society should be encouraging family activities more that ever, so limiting access to people 18 is not acceptable. As more and more public land is being closed, more and more people are being forced into smaller areas, which then negatively impacts those areas. Then those areas are closed. This is a lose/lose for everyone.	
IND-COM-83	Please, I grew up riding there, I know 80 year old men who rode all there life's at Clear Creek that are perfectly healthy. If it is legal to smoke a cigarette, then it should be my choice if Clear Creek is unhealthy to me. Obviously somebody just wants this place closed, they have tried many times for other reasons without success. Now they have finally found one that is working for them, so they will go full bore with it. Please let us ride motorcycles there, we are truly running out of places to ride. I had to buy a bike for the street, because the dirt is disappearing.	Refer to Common Responses Section 1G.
IND-COM-84	From what you offer in the BLM Clear Creek Draft Plan I would favor Alternative A. But I do not think that is the way to go, please start over. Let's go back to the way is was forty years ago. Tear down the fences, open the area up; it should be an open area not limited to the few trails and roads that you have proposed. I have been going there for the last forty five years and no one I know or have I heard of any has experienced negative health effects from their activities at Clear Creek.	Refer to Common Responses Section 1G.

IND-COM-85	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-86	As a long time rock hound I have frequently visited the Clear Creek area without feeling any threat from the asbestos. I assume all responsibility when I enter the area. The sign age relieves you of any responsibility. KEEP THE AREA OPEN!!!!!	Refer to Common Responses Section 3D.
IND-COM-87	I hope rock hunters will still be able to collect minerals at the Clear Creek in San Benito County. The danger of asbestos is mostly for dirt-bikers, and not mineral collectors.	Refer to Common Responses Section 3D.
IND-COM-88	I am writing in favor of re-opening Clear Creek for all activities. I have enjoyed 20 plus years rockhounding in this park and already miss weekend trips to the area. The geology of the area and the many new minerals that have been identified in Clear Creek are tremendous importance to the scientific community globally. There are no cases of mine workers or BLM personnel ever having physical difficulties because of the asbestos. Please strongly consider re-opening the park for our enjoyment again. I have attended the meetings and read your documents and was not impressed with the EPA study as it was not done using data as the park is actually ustilized. For this reason and the many more that are constantly brought to your attention, please open Clear Creek.	Refer to Common Responses Section 3D.
IND-COM-89	Many people and families have enjoyed this area for camping, rock-hounding and OHV recreation for many decades, I have been since 1980. Today the CCMA is closed off to everyone due to the decision by the BLM Hollister, Ca. based on their opinion that an EPA study suggests that there exists potential harm from natural occurring asbestos found there. No single study in and of itself is conclusive. Asbestos is a man made product that uses naturally occurring minerals such as chrysotile in the process, chrysotile is only one of the minerals that can be used . The environmental study for Clear Creek Management Area failed to take into account the many studies showing chrysotile should not be grouped in with other types of asbestos fibers when looking at potential carcinogenic properties.This study contradicts a study performed by Stanford University in the 1970's, which essentially concluded that the potential harm to humans was extremely remote. Not all forms of minerals used to make asbestos have been found to be harmful. These	Refer to Common Responses Section 1A, 1F(ii), 3D, and 4A.

	minerals occur naturally through out the state of California. If the potential harm found in CCMA was real, then one would expect to find cases related to asbestos caused harm in the hospital and medical records of people who have recreated, worked and lived in the area. You would also expect to find a general awareness on the potential harm in the local population. People have been living, ranching, mining, and recreating in this area for more than 100 years. Asbestos exposure becomes a health concern when high concentrations of asbestos fibers are inhaled over a long time period. People who become ill from inhaling asbestos are often those who are exposed on a day-to-day basis in a job where they worked directly with asbestos and/or in the manufacturing of asbestos. Actual health risks could be much lower than those estimated in the CCMA assessment since the recreation area dosen't have the same exposure times as the studied occupational examples. The DEIS must consider the uncertainty rather than using worst case scenarios.	
IND-COM-90	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-91	Please do not close the Clear Creek area off from the public. It is a beautiful area with a lot to offer the public. It has multiple uses for recreation and enjoyment for all ages. If the area needs to be managed, then manage it. Closing it totally off would be a shame. If there is too much dust being created by certain use, manage that specific use. Don't close it off to all use just because there is a problem in one or two. My husband and I have spent time in the area and enjoyed it very much. We are looking forward to spending more time in the future.	Refer to Common Responses Section 3D.
IND-COM-92	Hello, My family mostly rides down in Hollister- but I have some friends that love to ride at Clear Creek but they say they can't ride there due to closure, please try to keep it open because riding places are becoming harder to find that are convienent and close to our houses, my family and I travel all the way from napa to hollister which is pretty far, thanks and please provide more recreational places for the public.	Refer to Common Responses Section 3D.
IND-COM-93	My friends and I had been hunting deer, pigs and turkey at the Clear Creek area for the 15 years before the May 2008 closure. We are concerned that we might not be able to access our favorite hunting spots that we access	Refer to Common Responses Section 3D.

	from many points along R002. We access these areas by driving our 4-wheel drive vehicle up the R002 with our windows closed. If vehicles are no longer allowed to drive up that road then we will not be able to hunt that area. None of us own ATV vehicles and we are all too old to be walking up that road. It is enough of a workout to hike from the R002 road to access our hunting area. It would not be practical to be carrying game that we killed by walking the extra distance up and down the R002 road to Jade Mill Campground. We would like to see BLM leave the 3 mile section of R002 above Jade Mill Campground open to vehicles. An alternate access to the BLM land south east of Tucker Mountain would be great, although that could take years to get a willing landowner to coordinate that with BLM.	
IND-COM-94	**Subject: Factors that the agency has completely overlooked, but would change the outcome if known to the Decision maker,** No epidemiological studies of recreational exposure to asbestos were included in this document, and, The large number of mesothelioma cases in the California cancer registry provides the opportunity for further study, and, The USEPA is not the sole expert; in fact they have no data for "excess lifetime cancer risk" for recreational exposures. All of their data is extrapolated from occupational exposure data. **Discussion:** BLM has relied solely on the EPA"s report which states : "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 <u>occupational exposures</u>**, 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". BLM did not solicit reports from known experts outside of the EPA, nor did they include research contradictory to the EPA report that is readily accessible to the general public through internet search engines. **Subject: The EPA did not use the most up to date protocols for assessing risk and did not differentiate risk from different types of asbestos.**	Refer to Common Response Section 1D and 1F(i). The overall costs of obtaining epidemiological studies of recreational exposure to asbestos are exorbitant.

	Discussion: In 2003 scientists D. Wayne Berman, Aeolus, Inc. and Kenny S. Crump, Environ Corporation prepared a document by request of U.S. EPA. The final draft of this document is called: "FINAL DRAFT: TECHNICAL SUPPORT DOCUMENT FOR A PROTOCOL TO ASSESS ASBESTOS-RELATED RISK." Nowhere in the Draft RMP EIS, nor in the EPA CLEAR CREEK MANAGEMENT AREA ASBESTOS EXPOSURE ANDHUMAN HEALTH RISK ASSESSMENT is there any documentation of studies that determine what constitutes "typical CCMA recreational activities". Even in the OHV recreational community there is disagreement about what constitutes "typical CCMA recreational activities". Without documented studies, "typical CCMA recreational activities" can only be anecdotal speculation. Different assumptions would almost certainly have led to different sampling methods and different results or conclusions. As a result the EPA report is flawed and results in a DRMP/EIS that significantly impacts recreation in the CCMA. Conclusion: BLM used a report with no evidence of any real analysis, which was skewed towards one alternative only. This will cause foreseeable significant impacts to recreation in the CCMA. BLM must disregard the entire EPA report, or commission further balanced studies on human exposure to Chrysotile asbestos in the CCMA, and incorporate those studies into this planning process.	
IND-COM-95	Alt. "D" is a viable option. The DEIS does not adequately analyze this alternative due to "no public access" but, New Idria Road goes very close to the Tucker area and Los Gatos Rd already provides acess to Condon. Developing new staging/camping areas inside the CCMA but outside the ACEC is a viable option that would cost less money than locating, studying and developing another OHV area.	Refer to Common Response Section 3C.
IND-COM-96	We need more access and more miles of trails for multiple use, not less for motorized users. It's time to realize we all own public lands, not just hikers. All decisions must be made for the most common good as defined as most use by all in a shared managed area. Closing trails to certain type of users is not	Comment noted.

	management, its laziness and giving in to PC.	
IND-COM-97	**Substantive Comment # 1:** **Subject:** Errors in Estimation of Usage **Regarding the following paragraphs found on pages referenced** 1.REC-VIS-EF2. Provide a limited number of recreation facilities in the Tucker, Condon, and Cantua zones to meet increased recreation demand while protecting natural and cultural values and providing for public safety. (Page 85) 2. Over the past 20 years, motorized vehicle use has been more closely managed as a result of increasing demand, (Page 132 3.1.1) 3. The number of annual recreational visits to CCMA public lands continues to increase, primarily because of their proximity to urban areas such as San Jose, San Francisco, and coastal communities (Page 136 3.1.4.3) 4. The amount of OHV use would also be sustained at 35,000 visitor use days, with slight increases over the life of this plan. (Page 446 4.7.3.2) 5. The OHV-related environmental impacts from increasing OHV use on the CCMA route network would affect soil erosion, damage to vegetation, wildlife habitat fragmentation, and the spread of invasive species.(Page 149 3.3.5) 6. However, OHV use has increased over the past thirty years, the resulting impacts to scenic qualities are highly visible in Clear Creek Canyon, and are expected to continue to increase in designated vehicle use areas within CCMA. (Page 3.16.4.2) 7. Current observations are that OHV use at CCMA is not increasing at the rate of other OHV areas, although publicity and population growth would be expected to contribute to slight increases in CCMA visitor use over the life of this plan. (Page 305 4.1.2.1) 8. Current observations are that OHV use at CCMA is not increasing at the rate of other OHV areas, although publicity and population growth would be expected to contribute to slight increases in CCMA visitor use over the life of this plan. (Page 308) 9. Recreation use of public lands is expected to increase as population grows not only in the Central Coast and Diablo Range areas that support local use but also throughout the HFO and California. If recreation use were to grow at a rate proportional to population	**Comment # 1:** Refer to Common Responses Section 1G. **Comment # 2:** Refer to Common Responses Section 2B. **Comment # 3:** Refer to Common Responses Section 2A. **Comment # 4:** Refer to Common Responses Section 3C. **Comment # 5:** Refer to Common Responses Section 1F(i). **Comment # 6:** Refer to Common Responses Section 1D. **Comment # 7 & 8:** Refer to Common Responses Section 1C. **Comment # 9:** Refer to Common Responses Section 1E and 3D. **Comment # 10:** Refer to Common Responses Section 4A. **Comment # 11:** Refer to Common Responses Section 1C and 1D. **Comment # 12:** Refer to Common Responses Section 1F(ii).

	growth in the Central Coast and Diablo Range areas, over 50,000 annual visits would be expected, compared to the estimated fiscal year 2006 use of 43,000 visits. However, a more likely scenario is that the increase in recreation visits would far exceed population growth as competition for recreation space accelerates and as word of the recreation opportunities on BLM lands in CCMA spreads. If use were to triple during the life of this RMP/EIS, over 90,000 visits annually would be expected. (Page 522 4.15.2.4) 10. OHV recreation users have been riding on the barrens with increasingly frequency over the past 40 years. (Page 598) **The statement and table below contradicts the statements above.** In 2007/2008, recreation use in the Planning Area was estimated at 35,000 visitor days, with about 80% of this attributed to OHVs. These estimates have not changed drastically over the years, even with the increasing popularity of OHV recreation in California. (Page 135 3.1.4.2) Table 3.8-1. CCMA Visitor Use Year Visitors 2003 50,000 (Estimated) 2004 50,000 (Estimated) 2005 43,235 2006 43,187 2007 35,267 2008 28,428 2005 CCMA closed between June and Oct. 15 2006 CCMA closed between June and Oct. 15 2007 CCMA closed between June and Oct. 15 2008 CCMA closed May 1 **Dialogue** Visitor use, shown above in table 3.8-1, has been declining. CCMA was closed one month early in 2008. But we can extrapolate the visitor use that would have occurred. The 2007 figures of 35,267 equate to around 4,700 visitors a month. The EIS attest the highest usage is in the wet months. May is not a wet month so adding only 2,500 to the 2008 totals, which brings the figure to an estimate of 30,928. This represents a drop of around 39% since 2003. All of the above statements are contradictory – these estimates have not changed drastically through the years shown in Table 3.8-1, even with the increasing popularity of OHV recreation in California Page 135 - or in error. Concerning Table	

	3.8-1, It is critical to know the number of unique visitors because the health assessment risk is based on individual exposure. To bring the EIS into compliance with CEQ regulation 15001.1 (b) I request the following changes be made: Requested changes made by statement number: Statement 1: Remove "to meet increased recreation demand." Statement 2: Remove "as a result of increasing demand." Statement 3: Remove entire statement. Statement 4: Remove entire statement. Statement 5: Remove entire statement. Statement 6: Remove entire statement. Statement 7: Remove entire statement. Statement 8: Remove entire statement. Statement 9: Remove entire statement. Statement 10: Remove entire statement. Concerning Table 3.8-1: The DEIS should indicate the BLM does not have information regarding the number of unique visitors to the CCMA area. Also remove the entire dissertation 3.3.5 "Trends and Forecast" on page 149. Since CCMA usage has been declining, this has no quantitive relationship with CCMA **Substantive Comment # 2:** **Subject:** Purpose and Need –California Condor Issue The California Condor's diet consists of medium and large-sized dead mammals like cattle, sheep, deer, and horses in any state of decay. Condors may travel several hundred miles in search of food. The habitat range for condors in central California includes about 15,000 square miles, of which CCMA provides about 48 square miles, or .3% of the condor's habit. Therefore, because the condor habitat contribution is insignificant, the CCMA management plan cannot produce any significantly quantifiable habitat contribution for California condor. The Bureau of Land Management discussion of "Cumulative Effects" on page 442, state the following: □□California condors are slowly increasing in numbers but continue to suffer from ongoing contacts with humans and human artifacts such as power lines, which elevates the significance of relatively unoccupied	

	regions such as CCMA to the species. However, the Agency's discussion fails to show how CCMA recreation would effect condor habitat because no CCMA recreational activities involve utilization or installation of "power line." The Bureau of Land Management has failed to show a cause for action necessitating inclusion of the California Condor in the resource management plan or the environmental impact statement. The BLM has also failed to show a significant Purpose and Need for this discussion in the management plan or environment impact study, or how CCMA recreation affects the California Condor habitat. Therefore, the California condor is not a specific factor requiring update of the management plan, and hence such discussion must be removed from the Purpose and Needs statement and must not be included in the final environmental impact statement. Therefore the subject statement should be rewritten as follows: 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 red-legged frog, and tiger salamander. **Substantive Comment # 3:** **Subject:** Erroneous Statement **Referring to the Following Paragraph:** ES.1, paragraph 5, Page I 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**" The BLM should correct the report and replace the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain". **Substantive Comment #4:** **Subject:** Failure to follow NEPA guidelines	

	BLM has failed to provide a No Action alternative but instead has added conditions to the No Action Alternative. **Substantive Comment #5:** The EPA report fails to show any health risks by not providing an Epidemiology report which would back up their data. For a variety of reasons, it is very difficult to do a valid epidemiological of the health outcomes from either occupational or recreational exposures at CCMA. **Discussion** The EPA failed to disclose this very important information in their 2008 CCMA Asbestos Risk Assessment even though Jere Johnson knew about this information well in advance of the report being published. It's required by CEQ (1502.22 Incomplete or unavailable information) to disclose these types of information when it's critical to the assessment. Add to the DEIS a notice that asbestos risks evidence is lacking. The BLM EIS must indicate there is no epidemiological information available from the EPA because the EPA finds it too difficult to obtain a valid epidemiological report. **Substantive Comment #6:** The EPA report indicates the information regarding health risk is uncertain. BLM should not consider the EPA report as "significant". The EPA used as guidance procedures from a Superfund site. This has nothing to do with recreational use at CCMA. BLM used the EPA document incorrectly by claiming the EPA document relates to asbestos risks relating to recreational use, which it is not. **Substantive Comment #7:** The EPA report regarding health risks associated with Asbestos at CCMA does not apply to average recreational users, rather it was based on 30 year usage. Until a study which depicts normal recreational usage	

	study is provided by the EPA, BLM is required to remove all references to Asbestos risks to recreation users. **Substantive Comment #8:** The EPA report did not use typical recreational activities. The average rider does not ride at CCMA for 30 years. The test methodology used did not simulate a typical day. Most motorcycle riders spend the majority of the day on single track trails where dust is less of an issue than when travelling down roads. The EPA used a more realistic average in the 1991 ROD and used an incorrect average in the 2008 Risk Document. In either case real numbers need to be used based on counting the visitors. This has never been done so the EPA is guessing. The EPA is required to use accurate data. **Substantive Comment #9:** 43 CFR 9239.2-5 Settlement and free passage over public lands not to be obstructed. Section 3 of the Act of February 25, 1885 (23 Stat. 322; 43 U.S.C. 1063), provides that no person by force, threats, intimidation, or by any fencing or enclosing or any other unlawful means shall prevent or obstruct or shall combine or confederate with others to prevent or obstruct any person from peaceably entering upon or establishing a settlement or residence upon any tract of public land subject to settlement or entry under the public land laws of the United States or shall prevent or obstruct free passage or transit over or through the public lands. BLM has illegally closed access to CCMA which are our public lands. **Substantive Comment #10:** The BLM is using the 2008 EPA Asbestos Risk Assessment as evidence when the document is only an assessment. BLM fails to identify there is lacking information that shows scientifically there is an asbestos risk at CCMA. **Substantive Comment #11:**	

	One key point from the asbestos toxicity evaluations that form the basis for the IRIS slope factor is that **smoking status is important in evaluating the probability or risk of lung cancer**. Asbestos exposure and smoking appear to be synergistic for lung cancer. Smoking increases the risk of disease from asbestos exposure, because the risks associated with each stressor contribute to total risk. The US EPA's IRIS toxicity value was based on mortality statistics from 1977 population data, including smokers. **Since then, the number of smokers in the population has decreased**. Therefore, the risk calculations may overestimate risks for CCMA users based on current population smoking patterns but may underestimate the risk for the population of users that smoke. **Discussion** The BLM Draft EIS/RMP fails to mention that smoking has decreased and risk calculations may overestimate risks for CCMA users based on current population smoking patterns. The BLM needs to include information that identifies that risk calculations may overestimate risks for CCMA users based on current population smoking patterns. **Substantive Comment #12:** BLM failed to mention the PTI study done in 1992. This report clearly indicates the EPA study which uses the IRIS toxicity values will have an overestimate of 7 times. BLM needs to include the PTI information in the EIS, or remove all references that are made to the EPA risk assessment.	
IND-COM-98	I would like to make it clear that I oppose closing Clear Creek to OHV, specifically off-road motorcycles. I have ridden there for years, and the "asbestos" (actually serpentine) has never been a health problem. I demand that you re-open Clear Creek to OHV enthusiasts. It is one of the few motorized recreation areas left in CA.	**Comment # 1:** Refer to Common Responses Section 1B.
IND-COM-99	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-100	For thirty years now my family and close friends have used Clear Creek as a gathering spot for reunions,birthdays and camping , not to mention the	**Comment # 1:** Refer to Common Responses Section

	incredible terrain for our hobby of motorcycle riding.These times have been interrupted,and are terribly missed.Please open Clear Creek,there has to be a compromise.	3D.
IND-COM-101	Enough is Enough!!! The facts are out there that chrysotile asbestos is harmless to humans. Scientific journals such as The New England Journal of Medicine, International Journal of Health and Research by Taylor and Francis, and Review Article: Indoor and Built Environment by E.B. Ligren has proved that chrysotile asbestos is harmless to humans. The facts about CCMA chrysotile asbestos are: -No asbestosis or mesothelioma has ever been associated with CCMA exposure -Scientific studies show that chrysotile asbestos is harmless -Mesothelioma is an extremely rare diseases -There is no natural amphibole asbestos danger in the CCMA -The EPA study focused on historic sites contaminated with imported asbestos Need I remind you that the EPA is also responsible for environmental disasters like mandating the reformulation of gasoline that caused MTBE to poison our drinking water and caused millions if not billions of dollars to replace gas station storage tanks? The EPA was also responsible for the reformulation of diesel fuel that destroyed thousands of engines and put the hard hit trucking industry under further financial strain a few years back. Simply because they did not test the reformulated fuels compatibility with fuel injection o-rings was irresponsible and shows the lack of good judgment of the EPA. Further proof is the fiasco of the head of CARB Hein T. Tran's phony PhD that shows that bad science by fake scientist has caused more harm than good to this great country. Also, the closure of CCMA (and likely now Carnegie) has caused further crowding of Hollister Hills and Metcalf. I've seen more accidents caused by crowded conditions recently. It is a rare day when you don't see an ambulance blaring (or helicopter) away headed to some down rider because of a head on with another rider, or because of the poor trail conditions caused with over use. I personally know of a young rider who recently broke his neck and is paralyzed from the neck	Refer to Common Responses Section 1A, 1B, 1C, 1D, 4B, and 4D.

	down. He wanted to be an astronaut after he graduated from college. Now he sentenced to his wheelchair where he can't even feed himself. Supposedly the EPA is saving us from asbestos by closing CCMA, but instead the EPA is making trail conditions more dangerous caused by overcrowding.	
IND-COM-102	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-103	We are a non-profit organization dedicated to the education of the public, specifically: "To create, develop and encourage a general interest in and appreciation of the earth sciences and all allied subjects." (Articles of Incorporation) and to: "...disseminate knowledge of mineralogy and the earth sciences... and to encourage study in these subjects through means of ...field trips for exploration, study and collecting of specimens..." (By-Laws) We feel we have a very legitimate claim for our continued access to the CCMA and would oppose any restriction therein as hampering our ability to fulfill our mission on behalf of all the people California as described above. We consider the CCMA to be one of the premier gem and mineral areas in the country. It is the only area in the world where gem quality benitoite gemstones and specimens may be found, and is the locality of discovery of a significant number of unique minerals. Without access by knowledgeable people to explore and study this area, it is very likely that other unknown and potentially important minerals will remain undiscovered. We have a particular interest in the Benitoite Gem Mine and the jade and agate collecting areas located along Clear Creek and the Clear Creek Road. We have also visited many of the other mines in the area including many of the abandoned mines in search of gem material and collectable minerals. Areas that are available for gem and mineral collecting and discovery are drastically shrinking – everywhere. The loss of so many collecting and study areas to urbanization and set asides for parklands or other use make it imperative to do everything reasonable to keep important and otherwise remote areas like the CCMA open and accessible to responsible and well informed individuals and organizations in pursuit of knowledge	Refer to Common Responses Section 1A, 1B, 1C, 1D, 3A, 3D, and 4A.

	that benefits all people for all time. We question many of the base assumptions and are very much concerned with the approach used in your draft environmental statement (DEIS) wherein you consider all types of naturally occurring asbestos as being of equal health risk, when there is growing evidence that such is not the case, and those risks being based on occupational health studies involving manufacturing of and manufactured asbestos products. We do not think, as it has not been demonstrated, that all serpentine soils exhibit the same toxicity as assumed in your consideration of alternatives, and we do not believe the occupational health studies you cite are applicable to the very limited exposures that might be encountered during our occasional studies within the CCMA. We also note the DEIS fails to identify or cite any actual case where an individual has contracted any of the negative health conditions specified as the cause for alarm for which this exercise is undertaken. There are at least 20 different serpentine soil types within the CCMA with varying amounts of the various types of asbestos. A more comprehensive soil survey is needed to determine the amount of the various asbestos types to be found in the various serpentine soils. There are approximately 1,000,000 acres of serpentine soil areas throughout California spanning 44 of the 58 counties. Serpentine soils are known to occur in 19 states beyond California. A broad brush approach of lumping all serpentine soils as presenting an equal health hazard when considering alternatives for dealing with naturally occurring airborne asbestos, in our view, it is not an acceptable approach from a human or practicable standpoint when considering management alternatives by a land management agency.	
IND-COM-104	As someone who grew up in the New Idria Mining District and has mined gems and minerals from the region for over forty years, I feel you are doing a great injustice to all the future generations of hikers,bird lovers, nature lovers, rock-hounds and outdoor enthusiast who cherish and absolutely love that area. If liability is the issue, have people sign away their right to find the government liable. Geologically the New Idria Mining District is a very unique area in fact nothing else quite like it exists accept in the Ural Mountains. Face it guys California is full of Asbestos, there are	Refer to Common Responses Section 3D.

	some great sites in the bay area, that has far better long fiber than anything found in Clear Creek.	
IND-COM-105	I was born, raised, and still live on the Birdwell Ranch in Los Gatos Canyon. So I am very familiar with the Clear Creek area and adjacent BLM lands. I would describe them as beautiful, stark, a treasure of minerals, rocks, rare and unique flora, and wildlife from lizards to chipmunks to the mountain lion. The serpentine landscapes are easily abused. On the barrens lichens, mosses, and plants that are able to tolerate shallow, nutrient poor soils take years to form in the harsh climate. They are fragile, easily uprooted. Open OHV use on these unique geologic features causes devastation that may never be restored. If BLM is mandated to provide the OHV recreationists a place to ride I would rather see Clear Creek reopened with enforced designated use, and stronger restrictions on riding areas, than to see BLM open up new lands that would surely be used as OHV recreation areas. I say this as a person with deep love and respect for the land, and someone who enjoys the quite beauty of the landscape. Clear Creek Management Area (CCMA) was visited by hikers, naturalist, rock hounds, and people just looking for a unique and beautiful place to visit. Don't close the main Clear Creek Road to the people that use the area responsibly. As for a recreational staging area at the Condon Peak access and new roads including a road to Condon Peak I am strongly opposed. We need areas where there are no roads only hiking trails. The area is used by hikers, hunters, rock hounds, and naturalist including bird watchers and botanists. It would be impossible for BLM to keep OHV use out of the area, and would provide access for traffic to the red zone. Law enforcement would need to be upgraded and constant. The soil in that area is highly erodible adobe, not suited for a staging area. Condon Peak access area is also within shouting distance of Lee Scazighini's home. From his house vehicles, guns, voices, campground noise in general would be heard. Vandalism would very likely be a problem. BLM needs to consider this and strive to be a considerate neighbor. I strongly oppose the loss of any grazing leases to	Refer to Common Responses Section 3D, 4C, and 4D.

	recreation. Furthermore, I strongly oppose the opening of any new OFIV recreation areas and trails (Alternative D is unacceptable).	
IND-COM-106	As a person that used the area once or twice a year for about 3 years. I do not feel my health as been effected. But since the BLM seems bent on closing the area forever a compromise should be in order. Instead of the government givith the government taketh-away. Why not open an new area that does not impose a health risk? Instead of just saying you can't ride clear creek anymore? Oh and it's for your own health concerns. So there are air borne asbestos fibers. Instead of closing it how about riders using resperator requirement? I saw the pictures of the EPA guy where one when he was sniffing the area on that ATV. Has there been any evidence of anyone having health problems that used the area for recreational use?	Refer to Common Responses Section 1D, 1F(i), 3A, and 3C.
IND-COM-107	As someone who has lived and worked at Idria for over 60 years, and the last 30 years in the San Carlos Bolsa area, I am intimately aware of the re-creational uses in the Clear Creek and surrounding areas. **1. <u>I am strongly in favor of Alternative A.</u>** (a) Excellent motorcycle riding in the Serpentine zone. (b) EPA report of asbestos hazard overstated. Flawed field work. (c) I know of no known lung problems caused by using the Clear Creek area from riding in the last 60 years. 2. BLM preferred plan Alternative E (a) Opening the road to the Bolsa, Cantua area to motorized vehicles will be harmful to the surrounding ecology and public safety. 1. This area is wild, beautiful and basically undamaged to date. 2. The road into this area has been closed to the general public for more than 100 years. Locked gates at Lillis (Martin) ranch on the east and Idria on the west. 3. This road over the shale formations becomes <u>impassable</u> after modest rainfalls. The resulting muds are <u>unbelievable</u> and vehicles will	Comment 1: The CCMA Draft RMP/EIS and this PRMP/FEIS identify the recreation resources values in Section 3.1.4. Please refer to Common Responses Sections 1C, 1D, 1F(i), and 4A regarding the EPA risk assessment. Comment 2: Please refer to Common Responses Sections 3A, 3C, 3D, and 4C regarding vehicle use in the Cantua Zone. Comment 3: Section 3.10.of this PRMP/FEIS identifies the results of a wilderness character inventory conducted during

	become trapped. 4. Due to the open grassland sections, controlling vehicle use over the entire area is impossible. Much damage will occur. 5. The fire hazard will be greatly increased. One to two feet tall oat grass is tinder dry in summer. 6. Numerous archeological occurrences (native Indians). 7. Prolific and varied flora and fauna in riparian zones. 3. The BLM should do everything possible to protect this area as a wild and natural zone. The country, from Three Rocks to Tumy Gulch and be-yond, should be preserved as a semi wilderness. There are few comparable areas left in California. Summary: I support alternative A, and strongly oppose any alternative proposing to open the Bolsa, Cantua area to motorized travel. To do so will endanger the public and result in damage to the surrounding country. Controlling vehicular use will be impossible.	this land use planning process in accordance with FLPMA Sec. 201.
IND-COM-108	I strongly believe that Clear Creek should be reopened for off-road use . The areas that pose a health risk due to asbestos should be marked as in the past and users beware . Most off road users do not use the area once late spring or summer has started due to dust and high heat.	Refer to Common Responses Sections 3A and 3D.
IND-COM-109	I strongly advocate that each of you vote to open ALL County Roads in the Clear Creek Management Area at the meeting on April 6, 2010. These are public roads and should be re-opened for use as such. Public lands in California are used and enjoyed by a broad cross-section of residents and we appreciate your careful and thoughtful consideration in favor of this request.	Refer to Common Responses Sections 3A and 3D.
IND-COM-110	I have been following the controversy regarding the proposed BLM closure of the Clear Creek area and would like to add my comments. I have been to this area several times to visit the Benitoite Gem Mine. I understand the desire of the BLM to protect the public from dangerous asbestos exposure, but I also feel that occasional visits in closed vehicles that are unlikely to allow significant exposure to air-born particles should not be banned. I also feel that the public should be allowed to make decisions for themselves in this matter	Refer to Common Responses Sections 3A and 3D.

	after receiving appropriate and accurate warnings regarding relative risk. Total closure of the entire area for all public use strikes me as an over-reaction to a minor health hazard.	
IND-COM-111	I am both a member of the Ventura County Motorcycle Club and an Certified Industrial Hygienist whom happens to be credentialed with the State of California as an Asbestos Consultant professional. I have reviewed the Clear Creek EIS on the impact of the naturally occurring asbestos. I do not accept complete closure of such a large historic area just because asbestos is located in the region. Asbestos is common, so common in fact , it is our state mineral. With riding occurring in the CC area for over 60 years, why has there been no evidence of health damage if this area and crysotile asbestos is so dangerous? In my opinion, the 2008 EPA CCMA Asbestos Exposure is a flawed study that needs to address additional available information. The human risk analysis is based on flawed assumptions. This study needs more real information utilized to be of any verifiable importance.	Refer to Common Responses Sections 1C, 1D, 1F(i), 3A and 3D.
IND-COM-112	The area has unique geologic interest and mineral collecting should be allowed. This area has much to offer for photographers of nature. The landscape is fantastic. I have been waiting to have access to use my new digital camera. There are many ways to mitigate known health risks and these can be as simple as paving roads in risk areas. Education on how to access the area and minimize dust exposure should be done. I have been negatively impacted by the current access restriction to the area. I look forward to being able to once again, explore and enjoy the Clear Creek area.	Refer to Common Responses Sections 3A and 3D.
IND-COM-113	The paragraph entitled "Waivers of Liability and Indemnification of Risk" on page 352 says: "Therefore, the potential for waivers of liability or indemnification of risk as 'stand-alone' mitigation measures for human health and safety do not satisfy the purpose and need for the CCMA RMP/EIS." Discussion: "Protection of human health and the environment" is not a goal listed in the Purpose and Need required by 40 C.F.R. § 1502.13, and in accordance is not a mission of	Refer to BLM responses to ORG-SCC.

	the BLM, and it therefore cannot be one of the management objectives being addressed in the EIS. The "overall protection of human health and the environment" is not a valid management objective for purposes of the EIS. The BLM's statement "potential for waivers of liability or indemnification of risk as 'stand-alone' mitigation measures for human health and safety do not satisfy the purpose and need for the CCMA RMP/EIS" is invalid. Recommendation: Remove the invalid statement from the EIS and replace it with the following text: "Despite this, if implemented with due care, waivers of liability or indemnification of risk constitute viable means to permit the continuation of existing levels of activity within the ACEC while acknowledging that, although fraught with uncertainty, studies and reports on the postulated health risks of asbestos in CCMA still have value."	
IND-COM-114	I would like to express my support for Alternative A from the Draft RMP/EIS for Clear Creek. This is the only sound alternative. There needs to be significantly more studying done by the EPA and other INDEPENDENT scientists before the closure can be final. - more tests should be conducted - more analysis needs to be completed - the public should have a stronger influence in this process While the above points are getting collected, CCMA should be opened and enjoyed in the interim. I don't agree with the closure, it was hastily done and poorly executed, CCMA should be reopened immediately.	Refer to Common Responses Sections 1F(iii), 3A and 3D.
IND-COM-115	Subject: Erroneous Statement Asbestos is an man made product, not a naturally occuring substance. Remove all occurances of "asbestos", "natually occurrring asbestos", and "NOA" with the "chrysotile" which is the technically correct term for the mineral of concern. Subject: Erroneous Statement The EPAs report is at best inconclusive. Also, there are other studies that contratict this one in terms chrysotile fibers collected. Therefore, additional studies must be	Refer to Common Responses Sections 1A and 1F.

	performed until the facts are clearly understood. Since there is not yet a real health hazard, CCMA must be restored to the preclosure status. Subject: Erroneous Statement The EPAs data gathering model is erroreous. No off road motorcyclist rides directly behind another rider when it's dusty. The EPAs model does not reflect real world exposesures. There model does reflect a potential worst case scenario, which only shows why common sense rules should be followed to minimize exposure.	
IND-COM-116	Although I am on the board of directors of the Fluorescent Mineral Society, I am writing to you as an individual. This well known and highly respected organization is composed of an international membership. As you might deduce from our name, we specialize in the collection and study of fluorescent minerals. As such we are quite interested in the retention of access to mineral collecting areas. Clear Creek is one such area. It is home to several rare fluorescent minerals including fresnoite, benitoite, and karpatite. The unique mineral formations there also offer an interesting variety of fluorescent minerals in the asbestos and mercury families. Fortunately I had the opportunity to collect in the area shortly before it was closed; some of my prized mineral specimens come from the Clear Creek area. Opportunities to collect minerals, whether for pleasure or scientific pursuits, are becoming increasingly limited due actions of both private and government entities. Although the western United States is blessed with a trove of mineral species, their distribution tends to be localized depending upon the local geologic past. One must go where the minerals reside. If collection is prevented because of arbitrary restrictions, then the community as a whole (not just the hobbyist and scientist) will be intellectually impoverished. The BLM has been entrusted with the control of vast tracks of public land. I am sure you agree that this trust is to be administered for the public good. It is in your power to re-open Clear Creek to the public and I respectfully request that you do so that the public may once again enjoy the benefits of this unique area	Refer to Common Responses Sections 3A and 3D.
IND-COM-117	If the public is notified as to the potential danger caused by asbestos in dust, then it is up to the recreational users to make the decision to use Clear Creek or not. This information can be made public via on site	Refer to Common Responses Sections 3A and 3D.

	signage, notification in local publications, off road periodicals, and email sites.	
IND-COM-118	As a resident of Coalinga, Clear Creek is a very important to me as it is the only close opportunity for significant recreation on public land.	Comment noted.
IND-COM-119	Please keep this riding area open for people like me to ride with my kids.	Refer to Common Responses Sections 3A and 3D.
IND-COM-120	In a time when more and more of our public land is close to us, (the public) I request you re-open the clear creek management area to OHV use. The OHV community takes great pride in this trail system and are the ones who maintain them. You will not see greater volunteer involvement, trail maintenance efforts, or area clean up as you do from the OHV users. We are the one who truly take pride in this area, therefore I request an immediate re-opening.	Refer to Common Responses Sections 1F.
IND-COM-121	I have visited this region for camping, hiking, and rock hounding for five years. I believe that there is a great need for this land to remain public and open for some recreations. There are few areas of such an interesting geologic make up as Clear Creek. It is this very unusual mineral make up that has caused the concern over the area. I recognize the concern and the need to manage the land to limit exposure to Asbestos. It is true that the use of this area as an off-road driving area is not a good idea. The off-road riding raises great amounts of dust that can then be inhaled. I respect individuals desire to ride off-road and wish there were a way to protect these riders from the hazards of this dust. Short of paving the whole area, there is no way to achieve this safety. This land is multi-use however, and the other uses of this land are not creating dust and disturbing the topsoil. The small amount of dust caused by rock-hounding is not endangering anyone. Hiking is not harming the soil either and does aid visitors in seeing the landscape and many features of the area. Upland hunting is another activity that is safely not disturbing the soil and one that is enjoyed by many as a public right. As a rock-hound myself I feel there are so few areas that allow legal collection that I need this area accessable. The paving of the main access roads and prohibiting off-road riding seems to be the best solution possible. I am sure that many off-road riders will be upset by this apparent change of the BLM's use	Refer to Common Responses Sections 3A and 3D.

	standards in the area. I would like to say that they should be able to take there own risk, but after seeing very young children following there parents on dirt bikes in a cloud of dust, I have to decline that argument.	
IND-COM-122	I have been a frequent off road user of Clear Creek for over 25 years. I pastor a church in Danville, Ca of around 500 people. We have around 10 families who frequent Clear Creek to camp and ride off road. I am a Sherriff chaplain for the county and a Fire chaplain as well. My good friend Rich Burkett owns the Burkett Ranch which borders the entrance to Clear Creek. They have owned their ranch since the 30's. We love Clear Creek and it is the only place like it in close proximity to the Bay Area. We were devastated to have it shut down to the public. I have never heard of a single case of cancer or asbestos related illness stemming from occasional use of Clear Creek. My friend Rich has never heard of a single case among all the ranchers surrounding Clear Creek in their 80 years of owning their ranch there. All the years of mining and trucking asbestos in its raw form have not had any measurable negative health results. Yet, the EPA shut it down. I understand the mandate to protect the public from health hazards but this has gone too far. The scientific thresholds for measuring asbestos seem biased and unreasonable. The science regarding the affect of minimal contact with particles of unrefined asbestos is skewed to accomplish a shut down. Clear Creek could hardly be more remote than any other off road riding area in the state. A vast majority of off roaders only visit a few times a year. Ultra violet rays from the sun pose a great threat of skin cancer to the public but the EPA does not prohibit people from going out into sunlight or getting sunburned. Living on the planet has many inherent risks. Just riding a dirt bike poses a potential for harm, but we permit people to own and ride. The risk of riding in this remote area is very, very low as it relates to contracting asbestos related mesotheleoma cancer or any other respiratory disease. The EPA might have finally produced the measurements they needed according to their own science. They and other groups have wanted to close down Clear Creek for over 20 years. In all those years no one has produced any clear link to riding in Clear Creek and adverse health affects. This land belongs to the public and I have no concerns for taking my family to Clear Creek at all. The road to Clear Creek is far more dangerous and has actually claimed lives. But the government is not going to shut the highway down. Allow the public to continue having full access to one	Refer to Common Responses Sections 1A, 1B, 1C, 1D, 1F(i), 2A, 3A and 3D. The decision to install a vehicle wash rack was approved in both of the BLM's previous Record(s) of Decision for the 1999 and 2006 CCMA RMP Amendments.

	of the most beautiful and popular riding areas in the state. We all acknowledge the presence of an asbestos mine and no one disputes the health risks of refined manufactured asbestos. But Clear Creek does not present that kind of threat or risk. Has there been one single law suit won against the BLM related to an actual proven case of asbestos related illness? The closing of Clear Creek was an extreme measure and not really in the best interest of the public who has frequented this place for 50 years. We are just sick about this. Now, according to my friend Rich, my government is spending millions to truck in (not too successfully he reported, i.e., highway not wide enough) some special engineered vehicle washing stations at Clear Creek. Another example of government misusing tax dollars and using the asbestos alarm to create an excuse to grow the government machine. I am sure there are some sincere folks who really believe they are looking out for the public and believe they know what is best for us in spite of our protests. But this is way too much and not necessary. Please reopen our land. Has anyone from the Salinas Ramblers, who have owned property at Clear Creek for their off road club for decades ever reported health issues related to unrefined asbestos exposure?	

IND-COM-123	As a 4-wheelers and Jeep owner I have had the opportunity to 4-wheel and camp in the Clear Creek area for several years prior to the closure. With 4-wheeling, and many other outdoor activities we are aware of the risks involved. I would encourage the BLM to re-evaluate the science used to create this Draft, and re-open Clear Creek, under Alternative A with modifications. I am not a scientist, and much of the information included in the Draft was intense. Six types of asbestos that occur naturally in the environment, two specific types of asbestos, located in the CCMA, amphibole and chrysotile (fibrous serpentine). *Amphibole* fibers are brittle, and a rod or needle shape, and are less common in commercial use. *Chrysotile* fibers asbestos has long, flexible fibers. Page 333, 4th paragraph: **Exposure Assessment** – "Most of the asbestos found in the EPA air samples was short fiber (< 5 microns in length) chrysotile asbestos. However, only the fiber size which has been most closely linked to asbestos disease, the longer Phase Contrast Microscopy Equivalent or PCME fibers (> microns long, 0.25 – 3.0 microns wide, > 3:1 aspect ratio) were used in the EPA exposure and risk assessment."	Refer to Common Responses Sections 1A, 1B, 1C, 1D, 1E, 1F(i), 2A, 3A, 3C, 4A, 4B, 4C, and 4D. The no action alternative includes the decision to install a vehicle wash rack as approved in both of the BLM's previous Record(s) of Decision for the 1999 and

	Page 334, 3rd paragraph, last sentence: **4.2.4.3 Results** "It is also important to reiterate that the asbestos concentrations used by EPA in the CCMA Asbestos Exposure and Human Health Risk Assessment are based only on asbestos fibers known as phase contrast microscopy equivalent (PCME) fibers because they are the fibers whose shape and size have been most closely linked to asbestos disease." Page 340, last paragraph, last sentence: **4.2.5.1 CCMA Asbestos Exposure and Human** Health Risk The asbestos concentrations used by BLM in the CCMA RMP/EIS are based only on asbestos fibers known as phase contrast microscopy equivalent (PCME) fibers because they are the fibers whose shape and size have been most closely linked to asbestos disease." Given the flawed and exaggerated science used for this Draft on CCMA all of the Ratios, Scenarios, and Risk Summaries, have exaggerated risks. And comparing occupational exposure risks with that of occasional motorized recreation use doesn't make any sense. The EPA should work to clean up old mining sites located in and near Clear Creek. In reading the Rotterdam Convention report of February 2004, it seems that all the votes are still out regarding risks from Chrysotile asbestos. "To date a total of 39 pesticides and hazardous industrial chemicals are included in the PIC (prior informed consent) procedure". Chrysotile asbestos is not listed on PIC. "Chrysotile is a natural mineral present everywhere in the earth's crust and does not constitute a threat for the environment." The word "asbestos" has become a bastardized word which lumps all forms of asbestos into one category, all bad. The closure of Clear Creek Management Area, May 2008, is based on bias, flawed and deceitful science and is shameful, unreasonable, and unacceptable to the OHV public. A majority of the air samples were taken under "dry conditions", and do not represent true OHV use. With the many decades of use of Clear Creek Management Area, there are no studies showing any health hazard from OHV use and camping. The BLMs Alternative E is not acceptable. Alternative A, with modifications, and No Vehicle Wash Rack should be considered period. Page 352, 3rd paragraph, last sentence: **Vehicle Wash Rack** "Furthermore, the construction and operation of vehicle wash rack requires reliable sources of water, but it is unclear whether the resources would be available to support the visitor use levels under the	2006 CCMA RMP Amendments.

	range of alternatives." A Vehicle Wash Rack would not only require lots of water, as stated in the above quoted paragraph, but it would create more waste water and material discharge. A vehicle was rack, is more unnecessary spending, based on misleading and flawed science. BLM should immediately reopen Clear Creek Management Area to historic OHV use. I am all for safety for all of the employees of Clear Creek, I do question a facility, $2.2 million cost to the taxpayers for a Decontamination facility built adjacent to the entrance station on Clear Creek Road where .020 f/cc fiber counts were recorded during air sampling. In an economy where California is financially hurting, going bankrupt, the BLM approves a $2.2 million Decontamination facility that seems to be totally unnecessary, and is based on flawed science. Page 302 **4.0.5 Assumptions**, Bulletin 5 "The level of activity on BLM-administered land is expected to increase, based on historical trends, population increases, and statements of interest in land use by individuals and industry organizations. This includes ongoing reasonable access to private land or interests." The Area of Critical Environmental Concern (ACEC) is approximately 30,000 acres. The Hollister Hills Field office (HFO) manages approximately 63,000 acres of public land within the 75,000 acres of the Clear Creek Management Area. I understand that in the management area there are private lands, and state managed lands. If BLM and EPA wants to restrict OHV development inside the ACEC, why not develop some of the 30,500 acres outside the ACEC. None of the alternatives in the Draft do enough to enhance OHV opportunities. According to Table 1-2. CCMA Management Zones Ownership (acres rounded to nearest hundred) The BLM manages acreage located in the Tucker area (5,900 acres), Condon area (9,700 acres) and Canua area (14,900 acres) for a total of 30,500 acres. To only have one alternative, Alternative D, considering managing Tucker, Condon and Canua for motorized, mechanized, non-motorized and shooting, seems some what fair and equal, multiple use. Alternative G, would consider non-motorized use in these areas, and eliminate motorized access all together, and continues the total closure of Clear Creek Management Area, May 2008. If the Tucker, Condon and Canua areas can be considered under Alternative D for multiple uses, for an ever growing population, and	

	growing OHV use, then I would urge BLM to consider these areas for development for multiple use, in their final decision. Need help with managing future increase OHV opportunities at Clear Creek, please utilize the thousands of OHV volunteers more then willing to step up to help. I believe that the Alternative A in this Draft plan is in violation of NEPA, as "Install Public Wash Rack" is proposed.	

IND-COM-124	The Hollister staff are to be commended for the numerous elements of the preferred alternative that continue the protective administration of area with endangered animals and plants, their concern for the watershed, and their being open to continue to allow hunting in Clear Creek. It must be said that asbestos has been over-emphasized as a primary concern. Asbestos, endangered species, air and water quality, are all secondary to the primary concern of recreation. The staff in the Hollister office have done a fine job with these secondary issues in the past. I specifically disagree with the following sections of your preferred alternative: Trans-E1 and Energ-DEF1 Both these sections eliminate access from the Serpentine ACEC, and I find this to be unacceptable. The ACEC has numerous important sites and needs to remain open to the public, even if only on a somewhat limited basis. The ACEC should be kept open to mining and rockhounding. Trans-E5 and Air-BG2 Both these sections deal with access to Clear Creek during weather extremes. Weather has had no effect on visitor health or safety in the past. Couple this with the fact there remain a considerable number of questions as to the veracity of the EPA report and there remains no need to close the ACEC or Clear Creek as a whole any more than in the past. Speaking broadly, I am very concerned that collecting minerals, gems, and lapidary material continue to be allowed in Clear Creek, including the ability to access those areas. Clear Creek, besides being the only location of the state gem, contains gem quality neptunite, melanite and grossular garnet; amazing mineral specimens; lapidary material such as serpentine, chromite, and plasma agate. Clear Creek needs to remain open to mining opportunities for the	Refer to Common Responses Sections 1D, 2A, 3A, and 3D.

	public. Numerous areas of the ACEC can be closed to assist in public health, such as the main pit, but plenty of roads, mining claims and prospects should remain open to the public.	
IND-COM-125	I am writing this letter in regards to keeping as much land as possible open, for our families and friends to enjoy while enduring one of the true last outdoor activities- Off Highway Vehicle Use. Millions of OHV users pay a yearly fee in order to enjoy using their vehicle and by closing down more areas, all that is being accomplished in cramming all of us in a smaller area, causing more accidents and severe damage to the land. After all, hikers and mountain bikers do not pay any type of fee for using these areas. By keeping more acreage and areas open, it allows trails to be maintained easier, (Allowing access for people to work on them while other trails are open) and ensures that we are not leaving a harsher impact on a smaller amount of land. All too often, we see new fences going up and trails being closed down, many for no apparent reason. Off Highway Vehicles are truly one of the few and last outdoor activities that families can still enjoy while still spending quality time together and getting the kids off the couch and putting the video game controller down. Outdoor activities like these also allow our kids and families to receive much needed exercise and education regarding nature, coordination and most importantly responsibility. Families also get the opportunity to communicate and share great stories around the truck tailgate or campfire at night. I truly believe raising our green and red sticker fees is one way to help generate funds for proper trail maintenance and to ensure staffing levels. I would bet that most Off Highway Vehicle owners would support this type of action, knowing that their favorite trail would remain open and that they would not be crammed into a small area with new fences being put up along the perimeters.	Refer to Common Responses Sections 3A, 3D and 4B.

IND-COM-126	Clear creek is one of the most fun area's probably in the world to be able to ride, and I hope that it will soon be open for all. Charge @ the gate, whatever, just make it accessible so people can enjoy it. Let we the people worry about the health logistics, sign waivers, and be responsible for our own destiny. The sad state of affairs our country is in has a lot to do with the freedoms we lose on a daily basis.	Refer to Common Responses Sections 3A and 3D.
IND-COM-127	**I strongly <u>oppose</u> all alternatives identified in the CCMA RMP/EIS that allow vehicular access in the San Carlos Bolsa and Cantua areas**. **I do <u>support Alternative A</u> with the exception that public access is allowed year round, not just on a seasonal basis.** I grew up in the town of New Idria, attended its elementary school, rode the bus to Hollister for high school and was one of the town's last residents. My father is Mark Ward and our family has property in the western region of the San Carlos Bolsa area being considered by the BLM for public vehicular access. I learned how to ride motorcycles at age 12, and spent my youth and early adulthood riding, camping and racing in the Clear Creek riding area. I was a member of the Mountaineers motorcycle club and am a two time winner of the club's annual New Years Race held in the Clear Creek area. I am intimately aware of the soils and riding conditions in the area including the San Carlos Bolsa. I have walked, driven 4-wheel vehicles, and ridden motorcycles in this area and can speak from costly experience, that under certain wet conditions, the adobe clay in this area is impassable by motorized vehicles, period! It can even be extremely difficult to traverse by foot, and very easy to sprain an ankle as the adobe builds up on the bottom of boots. This soil can become incredibly sticky under certain conditions, and these conditions can happen year round. I have not seen the results of an in–depth environmental study regarding the adobe soils in the Bolsa and find it very irresponsible of the Bureau for not investigating and addressing this key feature of the region. Opening this region will result in stranded public, destroyed roads, and trespasses onto virgin range land in an effort to travel in the area when wet. Opening this area just won't work and any attempt to	The CCMA Draft RMP/EIS and this PRMP/FEIS identify the recreation resources values in Section 3.1.4. Please refer to Common Responses Sections 1C, 1D, 1F(i), and 4A regarding the EPA risk assessment. Please refer to Common Responses Sections 3A, 3C, 3D, and 4C regarding vehicle use in the Cantua Zone. Section 3.10.of this PRMP/FEIS identifies the results of a wilderness character inventory conducted during this land use planning process in accordance with FLPMA Sec. 201.

	circumvent the adobe soil issue will lead to the same result; vehicles can not travel in these wet soils under certain conditions! I strongly encourage the BLM to reopen the Clear Creek area to year round use in response to a flawed EPA study and growing evidence of the real non-hazards associated with the chrysotile asbestos in the area. This area is perhaps some of the best riding terrain and soil around, and I have spent many hundreds of hours riding the trails, hills and roads in the area. It is a great place to take your family, camp and drive, ride and hunt. Please revisit the Clear Creek area and open it once again to the public. It is a perfect ORV area for everyone concerned. In closing, I have traveled to my family's property in the San Carlos Bolsa area since I was young and have always marveled at the pristine, wild beauty of the region. It would be an environmental crime to allow public vehicular access into the area, especially when such a perfect region neighbors to the west, Clear Creek! I am speaking from experience when I say that this area is impassable by vehicle under certain wet conditions. Perform the in-depth environmental study that should have been conducted prior to this proposal, and you will come to the same conclusion, public vehicular access in the San Carlos Bolsa and Cantua areas should remain prohibited.	
IND-COM-128	For many years, when we lived in California, my family and I rode at Clear Creek. My boys learned a great deal from that experience. How sad that many more families are prohibited from enjoying Clear Creek because of misused and erroneous studies of a health hazard from asbestus in the soil. No evidence has ever been found that anyone has suffered asbestos caused illness from riding in the Clear Creek area. I strongly urge the BLM to reverse their decision to close this wonderful riding area. At the very least the BLM should extend the public comment period 90 days from the Feb. 12th date. Please apply common sense to this situation and start looking at a solution which considers the thousands of families who need an accessible place to ride.	Refer to Common Responses Sections 1D, 1F(i), 3A, 3D, and 4B.
IND-COM-129	I would like to express my outrage at the closed nature of the procedure employed regarding the use of this public land (CCMA). There is clearly an agenda against OHV use and there appears to be strong influence from anti-OHV political groups. There is no evidence to	Refer to Common Responses Sections 1A, 1B, 1C, 1D, 1F(i), 3A, 3D, and 4A.

	prove that the soil within the CCMA has lead to any injury, respiratory illness, or long term disease. The decision to close CCMA happened with little to no transparency. There was no evidence presented to warrant the closure of this land. It took 2 years to write a report, yet you want to make a decision in less than 90 days. This gives us no time to respond to the report. This procedure to close CCMA is rushed and strongly biased against OHV use. There appears to be no adult supervision at the Hollister Field Office and the horrific mis-management of CCMA should be investigated by an outside independent committee. My preference is that we approach the use of this land without any bias and political agendas. If science is required, then an epidemiology report should be conducted to prove beyond a shadow of a doubt that the use of this land causes health issues. As an adult, I would sign any waiver to allow me full access to this land. If health issues are not the driving force to this closure, then I would like this to be public knowledge with more transparency. From what I can tell, this is the independent action of the Hollister Field Office with an axe to grind against certain OHV users that can't follow the rules. I am strongly against closing this land. This is a special place that is unique to OHV and the best use of this land is to continue full access to OHV users.	
IND-COM-130	Having reciently driven the road between Coalinga and Holister I was reminded it is an incredibly scenic drive in the Spring. I was saddened to hear that the Clear Creek area is still closed to the public after two years in limbo. The Clear Creek area is both a beautiful area to see and a great photographers and rockhounders area as well as many other outdoors activities that needs to be open ASAP to the public to enjoy. I would consider myself a practical enviromentalist but it is obvious in this case the enviromental issues have obviously been very much overblown and do not remotely justify closing such a large area to the public, who collectively own the land, for such a long period of time.	Refer to Common Responses Sections 1D, 3A, 3D, and 4A.
IND-COM-131	I would like to champion the rights of ordinary, respectful rockhounds and mineral collectors, who have been shut out of area after area of public and private lands in California, particularly lately in the	Refer to Common Responses Sections 1D, 3A, 3D, and 4A.

	southeastern deserts. I believe that the alleged cangers of potential exposure to asbestos-type materials in the dust of the Clear Creek area DOES NOT represent a significant health hazard in the case of casual mineral collectors, certainly not a hazard justifying removal of the lands from potential rockhounding areas. We do not need more government protection from so-called hazards we can clearly see, understand and evaluate. If you want to stop lung cancer, ban cigarettes, don't over-reach yourselves and sound science, and ban healthy outdoor activities in California!	

IND-COM-132	I will begin by stating that I am a motorcycle rider, a mountain biker, a hiker, an environmentalist, and a land use professional. I am aware of the complex issues involved in the preparation and review of a management plan for an area such as Clear Creek. I also acknowledge the challenge the BLM faces in balancing access to public lands with protection of natural resources and in mitigating potential hazards from such public access. Although it is important to identify appropriate trail routes to protect natural resources and to provide public information for individuals entering an area of potential hazards, the elimination of OHVs from the Serpentine Area of Critical Environmental Concern (or the entire CCMA) is not warranted based on the studies performed. Proper route designation and location to protect natural resources, combined with public information regarding asbestos risk, are all that is needed to allow continued OHV access in the CCMA. As cited in section 3.2.3.1 of the DEIS, the off site exposure to asbestos from OHV use is limited and is similar to background thresholds in the North Central Coast and San Joaquin Valley air basins, therefore the only potential hazardous exposure is to individuals who voluntarily enter the ACEC. This potential hazard is further confused due to the fact that the thresholds used to measure the asbestos health risk were not developed for outdoor exposure from periodic OHV or other recreational use. As cited in section 3.2.3.1 of the DEIS, the IRIS and OEHHA toxicity values for asbestos were developed for workplace exposure to intermittent high asbestos concentrations over extended periods. These two methods were not developed to apply to periodic recreational asbestos exposure and additional testing is needed prior to arriving at the conclusion that periodic recreational use in the Serpentine ACEC will result in an increased risk to individual health. Prior to permanently closing the Serpentine ACEC to OHV use (or public motorized access of any kind), the following measures need to be taken: Additional testing of the amount of long term asbestos exposure any individual would have while using the area periodically	Refer to Common Responses Sections 1C, 1D, 1F(iii), 3A, 3D, 4A, and 4B.

	on an OHV, the size and type of asbestos material that may be ingested or released, and the actual detrimental effect over the long term resulting from the amount and type of asbestos on any individual (or the general public) as a result of periodic OHV use in the ACEC. Regardless of the asbestos and natural resource concerns, the access for the general public to the CCMA and the Serpentine ACEC for motorized recreation should not be substantially reduced or eliminated in the management area. 1lf the CCMA becomes an area that is essentially closed to OHV use, there will be additional off-site impacts that need to be adequately evaluated. As cited in section 3.1.4.3 of the DEIS, OHV users are on the increase and demand for OHV areas is high in California. These OHV users need to have access to public lands in which to operate their OHVs in a safe and responsible manner. Additionally, the access to public lands for OHV use has become very limited near urbanized areas, as cited in section 3.3.5 of the DEIS. As a result, the permanent (or undetermined temporary) closure of the CCMA to OHV use will create additional impacts in terms of vehicle miles traveled on local roads and state highways to arrive at alternate OHV parks. The assessment of the impact of these additional trips and vehicle miles on state and local roadways and intersections has not been adequately evaluated. Such a closure will also result in additional OHV vehicle use at alternate OHV parks in the region. As cited in sections 4.1.8.1,4.1.9.1,4.1.11, & 4.3.11 of the DEIS, the closure of the ACEC to OHVs would result in foreseeable increased impacts to existing OHV parks in the surrounding region. This would apply to all Alternatives (B, C, D, E, F, G) that reduce OHV access or close the ACEC to OHV use, and are not limited to the "preferred" Alternative E or Alternatives F & G. The assessment of the impact of these additional OHVs at alternate parks has not been adequately evaluated. No mitigations to these potential impacts have been identified in the DEIS. Given the high recreational OHV demand in the region, every OHV park closure (or reduction in access) should identify new (previously closed or unavailable) public lands that are to be opened to OHV use within the same management region as the closure in order to offset these potential impacts. Although I have not attempted to address all of the issues raised in the DEIS, I feel that there is a need to question the fundamental thought process behind closing a management area entirely to public use without a full and complete scientific assessment of the impacts of such a closure. The removal of yet another of the very few OHV parks in the vicinity of the SF bay area and central coast region will only put more stress and strain on other parks (such as Metcalf, Hollister, & Carnegie - also facing threat of closure). In order to avoid potential impacts to other OHV parks (and natural resources on public lands in general) another park of equal size, quality, and proximity to the SF bay area and central coast region would need to be identified and established prior to any permanent closure of the CCMA or ACEC to OHV access.	

	For this reason alone, I strongly encourage your office to keep the existing OHV access to the CCMA and ACEC open to the greatest extent feasible.	

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IND-COM-133	Comment 1: EPA CCMA Asbestos Exposure and Human Health Risk Assessment 2008 (EPA 2008) does not provide significant new information relative to actual human risk and instead merely provides yet another analysis of exposures to CCMA users. Inclusion of "significant new information" found in EPA 2008 as a Need for Draft Clear Creek Management Area Resource Management Plan & Environmental Impact Statement, November 2009 (BLM 2009) is unjustified. Coimment 2: There have been multiple exposure investigations performed at CCMA in the past; Cooper et al. 1979; Popendorf and Wenk 1983; Human Health Risk Assessment for the Clear Creek Management Area, prepared by PTI Environmental Services in 1992 (PTI 1992); EPA 1990a (Atlas Asbestos mine, located within the CCMA ACEC), and possibly others. Some investigations concluded that there was lesser exposure and some concluded that there was greater exposure. BLM was provided no significant new information by EPA 2008 which had not been previously been presented in any other previous investigation.	Note: Significant effort by the reviewer to understand the uncertainties in the evaluation and quantitatively estimate the effects are appreciated and the following responses are given to his detailed comments. Comment 1: Previous asbestos exposure information for off-road motorcyclists in CCMA was collected in 1978 (Cooper & Popendorf, et al 1979, Popendorf & Wenk, 1983) and in the early 1990's (PTI Environmental 1992). The EPA Risk Assessment Report collected additional exposure information at two different breathing heights for motorcycling and for several other activities that are common in the Management Area but were not previously assessed. EPA analyzed the collected fibers by Transmission Electron Microscopy (TEM) following the International Organization for Standardization ISO 10321 (ISO 1995) protocols, the currently accepted standard. These additional activity-based samplings allowed for an up-to-date, more holistic determination of possible exposures associated with combined activity scenarios, and provide significant new and complete information about the magnitude of exposures associated with current CCMA activities. All the studies that have been conducted conclude that high dust-generating activities within the CCMA Area of Critical Environmental Concern (ACEC) result in increased exposure to asbestos. Comment 2: DOI employee monitoring has also demonstrated increased exposure during dust-generating activities within the Area of Critical Environmental Concern (ACEC). Rangers' activities were determined to be best represented as lead riders in the 2008 EPA risk assessment, and a risk analysis for this activity scenario was requested by BLM. The appropriate exposure scenario and resulting risks are presented in the Risk Assessment in Figures 10 and 11. The analytical method used in the occupational assessment was Phase Contrast Microscopy

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	BLM Employee Exposure to Naturally Occurring Asbestos at the Clear Creek Management Area and the Knoxville Management Area, prepared by the Department of the Interior Office of Occupational Health and Safety, dated May 2008 (DOI-OOHS 2008) provides actual, rather than simulated as in EPA 2008, risk analysis of occupational exposures for BLM employees at CCMA. It should be noted that in DOIOOHS 2008, mean composite time weighted average exposure concentrations (composite TWA, fibers divided by actual sampling time only) for specific activities, which are analogous to individual activity-based exposure concentrations determined in EPA 2008, are lower than corresponding exposure concentrations in EPA 2008. Comment 3: Additionally and possibly most importantly, the risk unit presented in EPA's Integrated Risk Information System (IRIS) Summary for asbestos, 2.3E-1 fibers/ml, is not appropriate for exposures at CCMA. This risk unit is derived from a number ofepidemiological studies associated with occupational exposure to asbestos. The IRIS asbestos risk unit, used in EPA 2008, is used inappropriately and applies processed asbestos risk to a large natural chrysotile	(PCM). This is the standard analytical method for measuring occupational exposures, but it cannot discern smaller fibers with widths <0.25 um and does not distinguish asbestos from non-asbestos fibers. The TEM method used by EPA has the resolution to measure a wider range of fiber sizes and distinguish asbestos fibers from non-asbestos fibrous material. However, only the PCM equivalent asbestos fibers (PCMe) were used in the quantitative assessment of risk because those are the fiber sizes that were used to measure exposure in the epidemiological studies of the health outcomes of asbestos exposure. Additionally, in this study EPA followed the 1986 World Health Organization (WHO) recommendation to use a width limit of 3 um diameter as a limit of respirability. This modification is particularly applicable to the situation at CCMA due to the unrefined nature of the asbestos exposure. Large blocks or "chunks" where seen in previous studies (W.C. Cooper et. al. 1979) and were present in EPA's TEM analysis of the fiber dimensions. These large pieces would add to the PCMe counts using the older PCM method fiber definition, but would not be respirable and therefore would not add to the fraction that makes it into the lung. It is important to remember that fiber counts are being used as a surrogate measure of toxicity. In more recent TEM analysis of previous occupational PCM epidemiologic studies, all fiber dimensions - PCM, PCMe or other size fractions - correlate with disease; some more so than others and varying based on the exposure measured. (L.T Stayner, et al. Occupational Environmental Medicine 20 Dec 2007, D. Loomis, et al., ibid 5 November 2009) This is part of the continuing scientific effort to find the best indicator of exposure that correlates to health outcomes. Comment 3: The commenter correctly points out that in the derivation of the Unit Risk Factor (URF) for cancer from airborne asbestos (US EPA 1986), the milling and mining cohorts were not included. When EPA was reviewing the occupational studies that form the basis for the URF, positive correlations between fiber counts

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	deposit where human exposure would be far more similar to asbestos mining and milling human exposure and completely unlike human exposure to processed asbestos and asbestos products. Comment 4: *EPA used sampling techniques that had been used at the site previously, but let the trailing riders ride in the dust of the rider ahead.* Comment 5: *Analytical methods and PCM vs PCMe comparison.* Comment 6: *Amphibole fibers were detected.* Comment 7: *EPA's conclusion that children are of special concern is not supported by the data*	and cancer outcomes were observed for mining and milling cohorts, as well as for cohorts of other industries (textile production, insulation production, and installation and production of cement products). However, the milling and mining studies showed lower asbestos cancer potencies than those observed in other industries. This was thought to be due to differences in fiber size distribution between the industrial environments. The analytical method used at the time to measure exposures produced fiber counts that included fibers that were too large to reach the deep areas of the lung. Mining and milling exposures were logically thought to include a greater proportion of large blocky fibers that would not be respirable (EPA 1986). Inclusion of these nonrespirable fibers in the exposure estimates would dilute the apparent potency of respirable fibers present, thus artificially lowering the potency reported for the mining and milling cohorts (EPA 1986). Therefore, the URF is based on studies of processed materials where it was believed there was a lower proportion of nonrespirable fibers. These studies then more closely follow the exposure and response linkage manifested in the epidemiological studies. Large blocky fibers or "chunks" were seen in previous studies at CCMA (W.C. Cooper et al Science, 1979, vol. 209, pgs 685-8) and were present in EPA's TEM analysis of the fiber dimensions. In the EPA Risk Assessment, the definition of PCMe included a width definition of < 3 um that eliminated the thick fibers, as recommended by the WHO 1986. Therefore, the PCMe counts in the EPA study represent likely respirable fibers, and as such it is appropriate to apply the EPA URF to the EPA data for the CCMA. Comment 4: The commenter is correct that the classic industrial hygiene method of using a filter cassette placed in the breathing zone of the individual where air is sampled at a known rate was used in all the studies of activity based exposure at CCMA (W.C. Cooper et al 1979, Poperdorf and Wenk, 1983, PTI 1992, US EPA 2008). This demonstrates the usefulness of this procedure in assessing a wide range of activities. W.C. Cooper first reported a difference in the lead

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		and trailing riders' exposure in 1978. The US EPA 2008 report reproduced this result as illustrated in Figure 6 and Table G-4. It may be true that the riders in this study rode closer to the previous rider without experiencing a "mouthful of dust" because of their respiratory protection. However, group ride events are common among the activities at CCMA and the level of exposure would be increased in trailing riders. Table G-4 suggests as much as 10 fold higher with some degree of variability but still an increase in exposure. Comment 5: The commenter is correct that TEM measurements of fibers are different than PCM measures. The attributes of TEM - better resolution, ability to distinguish asbestos from non-asbestos structures, and standard international counting / annotation protocols - are an improvement over the previous PCM methods. Even though TEM provides additional refinement of the fiber size distribution, only PCM equivalent fibers were used in the risk evaluation. Additionally, in this study EPA followed the WHO 1986 recommendation to use a width limit of 3 um diameter as a limit of respirability. This would have the effect of reducing the fiber count, compared to only a fiber length and aspect ratio determination. Several authors have investigated the correlation of PCM and TEM-PCMe fiber counts (C.Y. Hwang and Z.M. Wang, 1983 Archives of Environmental Health, vol. 38, pgs 5-10, and more recently, L.T Stayner, et al. Occupational Environmental Medicine 20 Dec 2007, D. Loomis, et al., Occupational Environmental Medicine, 5 November 2009). PCM and TEM-PCMe fiber counts are well correlated with correlation coefficients of about 0.9. Even PTI, using the 10 samples which were analyzed by both techniques, had a correlation coefficient of 0.92. It must be kept in mind that fiber counts are only being used as a surrogate of toxicity. All fiber dimensions correlate with disease outcomes, but science is still seeking the best definition of that surrogate. Currently, the PCMe fiber counts are the measure by which exposure is determined. Comment 6: EPA did find amphibole asbestos in

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		the activity-based samples. The Agency currently makes no distinction of asbestos toxicity based on the form of asbestos. Asbestos is a natural mineral whose mineralogy is defined by the presence of minor amounts of other metals in the crystal structure. Refer to Common Responses Section 1. B. Comment 7: As illustrated in Figure 8 of the Risk Assessment, exposure measurements in child breathing zones closer to the source of the dust generation resulted in higher fiber counts. These increased exposures were incorporated into the risk assessment for the appropriate scenarios where children were recreating at the CCMA. The increased exposure resulted in increased risks. Additionally, there is still significant discussion in the medical community as to the physiological differences in the child lung that may make a child more sensitive to particulate exposures. EPA's Particulate Matter Air Quality Criteria Document (2004), a consensus document which evaluated the state of the science for particulate inhalation, concluded that there are models and supporting experimental evidence that predict significant differences in particulates depositing in the child and adult lung, and that this may have irreversible effects on the developing lung. This is another uncertainty not quantitatively included in the risk assessment. Also, with respect to asbestos exposure, there is a latency period from time of first exposure to the manifestation of disease. The latency period may or may not be different between children and adults, but the longer life expectancy for children and the probability that a child will live long enough to express disease is increased and proportional to the extent and duration of exposure. Therefore, the combination of increased concentrations of asbestos measured in the child breathing zone, and the fact that the exposures are occurring early in life, lead EPA to the conclusion that children are of special concern.

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IND-COM-134	The Centra Vally of Calif needs some place to go to enjoy, besides being bunched up in areas like Hollister Hills, Pismo, etc: Those areas are always full. I am a avid deer hunter, wild	Refer to Common Responses Sections 1D, 3A, and 3D.

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	pig hunter, and also a trail rider of old Honda "90"s. I have been using the Clear Creek area for over 30 years, I have yet to find in my system any signs of Cancer or asbestos in my body. I used to play in the asbestos at the 3 area mines, when they were open. 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. It would be most important to warn people of the asbestos danger than close the riding area's of ClearCreek. When we were asked to stay away from the Mines in the area, WE DID SO! WHEN WE WERE ASKED TO DONT TREAD THERE WE DID SO! Even a higher use fee maybe?, and maybe to sign a affidavit that no one could sue the BLM because of sme thing happening to them in the area?. I love just to rockhound there and just camp, no riding. So please in some way, reconsider the opening of the area, or at least some of it.	
IND-COM-135	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-136	I strongly support the closure of this management area to motorized recreation. The EPA risk assessment clearly demonstrates the serious risks to public health and safety from any continuation of this previous use. Asbestos from serpentine soils in this area can become airborne and be breathed into the lungs. This is especially true when motorized vehicles travel on these soil surfaces and stir up dust. Asbestos in lungs can become	Comment noted.

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	mesothelioma, a very deadly form of cancer. In any balancing of public health with recreation, public health should always receive the priority and the benefit of any doubt. I know that the Blue Ribbon Coalition and other motorized recreation groups want this area to continue to be used for motorized recreation. They tend to downplay the risks, and question EPA's expertise in the risk assessment. I believe that this is irresponsible as it places riding for fun above the health of the riders. This is foolish, selfish, and dangerous. Please do not let these obstructionist tactics keep you from doing the right and safe thing in the public interest.	
IND-COM-137	The Clear Creek closure was based on an incorrect conclusion. The type of asbestos at Clear Creek has never caused a health problem for a single person and you know this to be true. So why was Clear Creek closed? Clear Creek should be opened and BLM should take the position that the type of asbestos at Clear Creek is safe as has been shown in previous studies and health records of the asbestos workers at the asbestos plants that were at Clear Creek. I have been riding motorcycles at Clear Creek since 1970 and I have not had any health problems caused by asbestos.	Refer to Common Responses Sections 1A, 1B, 1F(i).
IND-COM-138	My name is Rick Kennedy and I have had the pleasure of meeting some of you in the office personally. I also supplied most of the minerals that are in the display at the Hollister office. I have collected in the CCMA since 1984. I have given a number of talks about the minerals found in the CCMA and led several field trips to various localities within the CCMA. Both clubs that I belong to (Bay Area Mineralogists and Santa Clara Valley Gem and Mineral Society) are working on official letters, but I thought it prudent to send my own letter in. As a mineral collector/rockhound, these are vital to my enjoyment of the CCMA: Four wheeled access and overnight camping. Although I am relatively hale and can hike	Refer to Common Responses Section 3D.

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	several miles, most of the people in my clubs are Senior Citizens and need to be able to drive within a 1/2 mile or so of any locality. Keeping most of the "R" roads open, especially R1, R5, R11 and some of the roads between them would facilitate access to important collecting locations. Closing some of the "R" roads and most if not all of the "T" roads is a compromise I could live with. As for overnight camping, although we do day trips occasionally, we tend to prefer one or two night stays near the localities we are collecting. It is an awful lot of driving on rough roads to make every trip a day trip. Personally, I am open to paying for permits and for having a limited number of total days in the CCMA. I think somewhere between 10 and 15 total days would be reasonable. I understand that drastic changes to the usage before the closure are needed to satisfy the EPA. I am hoping the accessibility I propose would satisfy them. The alternative chosen as the "best fit" by the BLM does very little to address the usage needs by the mineral collecting/rockhounding community, but it doesn't take very many changes to that alternative to allow for a 150 year old tradition to continue. This area is a mining area and has been one since Mercury was discovered in New Idria so many years ago. It would be a shame to permanently close access to such a unique mineralogical area.	
IND-COM-139	The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to consider the vastly lesser exposure of recreational visitors compared to the studies daily workplace exposure. The BLM used an EPA report based mostly on theoretical analysis of potential asbestos	Refer to Common Responses Sections 1C, 1D, 1F(i), and 4A.

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	exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek.	
IND-COM-140	1. **The 2008 EPA Assessment is biased.** 2. **The 2008 EPA Assessment fails to include previous report/assessment data.** 3. **Data is limited.** 4. **Data is incorrectly weighted.** 5. **Data numbers are incorrect.** 6. **Invalid data has been included in the 2008 EPA Assessment.** The 2008 EPA Assessment has not provided the "substantial new information" as stated in the 2009 DEIS/RMP. The assessment has not provided conclusive evidence that there is a real risk to users of the area and there are numerous issues with the data collected and used (in common scientific terms "garbage in equals garbage out"). It is this author's opinion that based on the above, the BLM has not proved a need for the current "emergency closure" and subsequent preparation of the 2009 DEIS/RMP. As such, the 2009 DEIS/RMP needs to be declared null and void, the area needs to be reopened immediately, and the BLM shall manage the CCMA under the current record of decision and amendments. Should the BLM elect to provide additional education outreach to users of the area and/or provide mitigation such as armoring of main roadways, I believe this would fall under an amendment to the current ROD, but does not warrant the need for a new EIS/RMP. The 2008 DEIS/RMP has erroneously listed [needs for species protected under the federal 1973 Endangered Species Act (ESA),] as a need for the document. As such, it is this author's opinion that based on the above, the BLM has not proved a need for the current "emergency closure" and subsequent preparation of the 2009 DEIS/RMP. As such, the 2009	Refer to Common Responses Sections 1C, 1D, 1E, 1F(i), 1F(ii), 2A, 2B, 2C, 3A, and 4A. The affected environment is described in Chapter 3, including all the public lands in the Serpentine ACEC. Maps of the public lands and the private lands that are in the ACEC are also included in Appendix 1 of the CCMA Draft RMP/EIS and this PRMP/FEIS.

Comment Code	Summary	Response
	DEIS/RMP needs to be declared null and void, the area needs to be reopened immediately, and the BLM shall manage the CCMA under the current record of decision and amendments. As the need [to address social and economic changes] is vague and misleading, it should be excluded from the DEIS/RMP. As such, it is this author's opinion that based on the above, the BLM has not proved a need for the current "emergency closure" and subsequent preparation of the 2009 DEIS/RMP. As such, the 2009 DEIS/RMP needs to be declared null and void, the area needs to be reopened immediately, and the BLM shall manage the CCMA under the current record of decision and amendments. **Abandonment of existing highways and rights of way.** Pre existing highways and rights of way which were in existence to a certain date, which this author did not have time to verify, cannot be abandoned, closed, or impeded by the BLM. This is under existing land use and rights laws and decisions. Should the BLM elect to continue to close roads that the public has prescriptive rights to, it is my opinion the potential for litigation against the BLM is extremely high. **Area of Environmental Concern is not clearly defined.** The area of concern, which is currently shut down by the emergency closure, is not clearly defined. The BLM needs to provide a metes and bounds description of the area, or accurately map the area using GIS, to the closest 5 feet to ensure that users are clear if they are within the boundaries of closure or not.	
IND-COM-141	Our property boarders large portions theses BLM properties, approximately 2,000 acres to the north and 2,000 acres to the south of the BLM leases. Since 2001 we have placed our ranch in cooperation with Department of Fish and Game (DFG) into a wildlife management plan called Private Lands Management (PLM). Prior to placing the ranch into the PLM program it was used as a cattle grazing	Please refer to Common Responses Section 3D.

Comment Code	Summary	Response
	operation. Since the PLM program all livestock have been removed from all of the ranch except a small portion near our house at the southern edge of the property, we use the lease property for the grazing of the local wildlife. We have spent considerable time and expense over the last nine years improving the habitat (water, forage) surrounding the BLM property to the betterment of the local wildlife population and the results have been very good. Deer populations are up considerably, Turkey populations are increasing and the Elk populations have increased dramatically. There is even a pair of nesting Bald Eagles that have produced over nine offspring. These are a direct reflection of the removal of Cattle (vegetation competition) and the decrease in vehicle usage in and around the BLM property. We would like to propose the following: 1. Keep the leases as they are now on a yearly lease. It does not cost the BLM any money and provides an invaluable wildlife resource to a very sensitive area. Disposing of the property at auction does not ensure that this pristine property stay as it has since it was homesteaded in the 1800's. 2. Keep existing restrictions on vehicle traffic. The soil type in #04410 and #04409 are adobe and very susceptible to erosion from OHV and larger vehicles. The lessee is responsible for upkeep on the roads, no cost to BLM. 3. Remove this property from the connection with the CCMA and manage it separately from the CCMA. BLM not adding these parcels to the CCMA OHV and trail system.. Just as there are many pieces of BLM in the surrounding areas that are not included in the CCMA. 4. And lastly if the top three proposals are not feasible we ask that BLM sell it to us and as a condition of the sale we would sell, or BLM	

Comment Code	Summary	Response
	can keep, the development rights of the parcels so that these delicate parcels will forever maintain their special status.	
IND-COM-142	I am writing to voice my opposition to closure of the Clear Creek Management Area.There is a shortage of OHV riding areas in northern california.To close CCMA would be to concentrate usage in the other areas.Many taxpayers want & need more places to participate in OHV recreation .CCMA is one of the best, and it would be a horrible injustice for the BLM to use faulty science to justify the closure. The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to consider the vastly lesser exposure of recreational visitors compared to the studies daily workplace exposure. The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek. Please consider not taking away another wonderful place that I love to enjoy.	Refer to Common Responses Sections 1C, 1D, 1F(i), and 4A.
IND-COM-143	My name is Rob Porcella and I am an avid motorcycle rider. I discovered Clear Creek in 2004 and brought my wife and stepson there to ride for their very 1st time on motorcycles. We camped there many more times after that and grew closer as a family enjoying the recreational sport of motorcycling together. I had read about the asbestos that was natural to the area and decided that it was a risk I was willing to take because enjoying those mountains was worth the risk. I also consulted with my father who was a Geophysicist for the U.S. Geological Survey, and his thoughts were that the natural asbestos would probably have to be constantly inhaled on a daily basis	Refer to Common Responses Sections 1C, 1D, 3D, and 4A.

Comment Code	Summary	Response
	for years to adversely affect someone. For example the miners who worked in the caves for years inhaling the asbestos dust. I have yet to see a study that demonstrates where OHV riders who have enjoyed this area throughout the years have developed some sort of asbestos related illness. I am afraid however that the naturally occurring asbestos is just and excuse for more OHV closures by special interest groups that feel OHV recreation is destructive to the land and habitat of the areas in which they are designated. Please look at this issue in a fair and balanced view and make the decision that is right based on the facts of this individual case. Thank you for your time.	
IND-COM-144	Clear Creek has been open to OHV use for decades. OHV enthusiasts have enjoyed and appreciated the riding opportunities Clear Creek has had to offer. We understand the current health concern regarding asbestos exposure. Perhaps a simple solution would be to open Clear Creek to OHV use on a seasonal basis. Once the winter rains have eliminated the dust, the health risk would seem to be minimal. This coupled with an OHV user fee expressly for trail and staging area maintenance should mitigate most of the problem. These measures would be acceptable to most OHV riders of the Central California area if it meant Clear Creek would remain open to OHV use.	Refer to Common Responses Sections 3A and 3D.
IND-COM-145	While it is of concern to watch out for my well being on public lands, it is also a necessary consideration for you to allow me to explore this beautiful land. There are inherent hazards in rock falls, animals, plants and a host of critters: but we don't close parks and public lands because they exist. Take into account your concerns and level that with what works best for all of us to enjoy this beautiful natural resource. I doubt John Muir hesitated to hike anywhere in California because of concerns of radium in granite, phosphorous in rocks or asbestos in dirt. Do what is best for us all and do not pick the easiest alternative. Work with us on suggestions for safety, health and recreation issues at Clear Creek.	Refer to Common Responses Sections 3A and 3D.

Comment Code	Summary	Response
IND-COM-146	The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek.	Refer to Common Responses Sections 1C, 1D, 3D, and 4A.
IND-COM-147	One idea that I've never heard discussed during the Clear Creek debate, are tires. By imposing a restriction on the type of tire used at Clear Creek the BLM could greatly reduce the impact of motorcycles there. I'm specifically talking about the use of trials type tires on the rear wheel. Trials tires use a soft compound low profile knobby. These tires are not made to spin, they use low pressure and greatly reduce impact.	Refer to Common Responses Section 1F(iii). Future activity-based studies could evaluate the levels of emissions and asbestos exposure associated with different tires.
IND-COM-148	Open up clear creek for riding permanently! Us riders are running out of places to ride.	Refer to Common Responses Sections 3A and 3D.
IND-COM-149	I do not feel that the EPA and others that put in these closure ideas are not representing the People. This is because these agencies are our employees, and serve at our, the People's choice. I personally do not want this or any area closed to the public and I have many friends and organizations who feel the same. I'm sure the Sierra Club and other such like ECO groups have threatened with law suites and such. That's just their way to push your agency to pressure other over bureaucratic agencies to issue illegal closures and disregard the Peoples choice. If the closures are not established by legislative process, they have not been established by the People. Enough said, again, closing Clear Creek to the Public is unjust and not a want of the People as a whole, there are dangers all around us every day, getting dirty is by far a lessor danger.	Refer to Common Responses Section 1G.
IND-COM-150	I am an avid recreational motorcylist, a Board Member of the Oakland Motorcycle Club, and chairman of its dualsport committee. I have ridden multiple times at Clear Creek. The Clear Creek Management Area closure is ill considered. I believe the health claims to be	Refer to Common Responses Sections 1C, 1D, 4A and 4B.

Comment Code	Summary	Response
	exagerated and undocumented. The effect on motorcycle recreation is devastating. Please reconsider this action.	
IND-COM-151	Please find a way to continue to allow reasonable access to ATVs to this area.	Refer to Common Responses Section 3A.
IND-COM-152	My letter is in response to the recent closure order of the Clear Creek Management Area (CCMA). I realize that no decision to close lands which affects large amounts of land and people is easy yet I do not feel the decision was made with long term implications in mind. I will site three reasons why I believe the decision was not in the public's best interest. 1. With current noise regulations of 96dbA being a continuing issue the closure of CCMA forces more motorcycles to ride near homes and cities which operate current OHV park. Even if all the motorcycles are under the noise regulations that larger number or motorcycles will create a greater overall noise pollution. This will continue to fuel the feud between neighbors and park users. Where as CCMA has very few neighbors directly affected by noise and is a good area to allow motorcycle use. 2. With the continued closure of public lands, the most recent being CCMA, my wife and two young sons are forced to ride in small crowded OHV parks. Even with wonderfully maintain parks like Hollister Hills the weekend crowds have resulted in many close calls between my family members and other riders. "During 2003, among persons aged 19 years, at least 245 died and an estimated 56,870 were treated in U.S. hospital emergency departments for injuries sustained while riding a motorcycle." (*JAMA.* 2006;296:273-274.) With injuries always on the ride BLM should be looking for ways to spread out motorcycle rides not pack them tighter together. 3. There will be long term revenue loss to cities near closed public lands. As fewer people ride and purchase motorcycles local shops will close and those cities will lose tax	Refer to Common Responses Sections 4B and 4D.

Comment Code	Summary	Response
	revenue. Local governments will receive less money for motorcycle registration. Thus, many of whom do not ride motorcycles, will be forced to make up the loss with higher registration costs.	
IND-COM-153	On behalf of all my partners of the OPT Ranch I would like it entered into the record that if any of the [Tucker Zone] BLM lands that touch our property go up for sale we get the opportunity to bid on purchase some of this property. I am hopeful however that the idea we proposed about the limited Elk hunt in this area is something the BLM will take into consideration in deciding what to do with his land. I think this is a win win situation for all concerned.	Refer to Common Responses Section 3D.
IND-COM-154	The public meetings were scheduled without adequate notice for preparation and to allow time to attend. I believe my written notice came about one week prior to the three meetings, which were scheduled almost back to back in mid January. No meetings were held south of Clear Creek where my experience indicates a number of users live. In generating the 691 page DEIS, data of air-born asbestos fibers was collected in Nov. 04, Feb 05, and Sep 05. These timeframes were selected to represent both dry and wet conditions. According to an EPA rep. the data was only collected over a one or two day period during the above months. In addition, the Feb. 05 data was collected during the Quicksilver National Enduro. that data would have been generated by 500 motorcycles leaving 4 per minute, plus ghost riders premarking the course, sweep riders clearing it, Individual 5-7 person check crews, in 4X4's and quads, operating a dozen or more checks to score competitors, Search and Rescue coming and going and numerous "outlaw" riders traversing the course. In addition, the course would have repeated many of the same trails 2 or 3 times to achieve the necessary loop mileage for the competitive event. This data hardly represents the "average" asbestos exposure during an "average" wet weather weekend. None of the data collected should be used as a baseline due to the limited	Refer to Common Responses Sections 1C, 1D, 3A, and 4D.

Comment Code	Summary	Response
	timeframe of the samples and the Feb. 05 data being biased. Due to lack of notification will the economic impact be adequately considered not only in the immediate area but in outlying areas where users reside? Review of the seven alternatives raises questions. Alternatives such as the BLM Preferred Alternative would essentially remove all recreational access to the entire 75,000 acres. Although it indicates "proposed" new access routes outside the Serpentine area, these would only allow access for rock hounds, hunters and hikers. According to a Hollister BLM rep. there is no timeline for implementation nor is there any funding source identified. Neither CORVA or the Green Sticker Fund will support or fund "access" roads. Remember the American Indian and promises the Government made? None of the Alternatives offer mile for mile alternate trails created prior to closure of existing trails in the Serpentine area. Therefore, I would suggest the public comment period be extended with a more zealous public notification process, the asbestos data be acquired over a broader sampling period by an outside contractor, economic impacts be more thoroughly addressed, and Alternatives include support for use of existing areas while alternate trails are created.	
IND-COM-155	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.

Comment Code	Summary	Response
IND-COM-156	Clear Creek Area is like a real life book of Nature with pages and pages of information on geology, rock formation, mineralogy, plants and animals. It gives one a real appreciation on the beauty of nature. Spending time there enriches the soul. It's value is incalculable. The area should be left open for all to enjoy!!!!!!!! I was very sad when my Grandpa told me we couldn't go rock collecting at Clear Creek any more. I hope he is wrong!!!!!!! I have FUN going with him. He has taught me alot about the different rocks. I like the green ones the best. Don't close my favorite spot in the whole world.	Refer to Common Responses Sections 3D.

IND-COM-157	My comments are limited to the "cultural resources" aspects of the DRMP/EIS, concerning the cultural/historical significance of the area and the impacts of management on cultural values. The DRMP/EIS is schizophrenic on the subject of cultural resources. In its generalities, it embraces a broad definition of the term that quite properly cites as examples historic properties of various kinds and culturally significant natural features of the environment. When it discusses how such "resources" will be managed, however, it appears to address only archaeological sites, with an occasional half-hearted bow toward Indian tribal traditional cultural properties. It is clear from the descriptive parts of the document that at least three and possibly four communities ascribe traditional cultural significance to the CCMA, more or less in its entirety -- (1) members of federally recognized and non-recognized Indian tribes; (2) rockhounds, (3) off-highway vehicle (OHV) users, and (4) possibly hunters. It appears likely that the significance ascribed to the area by each of these groups, grounded in association with their traditions and history, is sufficient to make all or much of the CCMA eligible for inclusion in the National Register of Historic Places, but once the evidence for it has been summarized, this likelihood is never further addressed in the DRMP/EIS. When the DRMP/EIS gets around to discussing management strategies, "cultural resources" and indeed by implication even the narrower category "historic properties" have seemingly come to mean archaeological sites alone, and the activities of the OHV community are treated only as impacts on this narrow range of resources. Clearly, there is a need for further analysis of the eligibility of the CCMA for the National Register based on its traditional cultural value to tribes, rockhounds, the OHV community, and hunters, performed in proper consultation with these groups. I find no evidence in the DRMP/EIS that BLM has undertaken efforts to comply with the requirements for such consultation imposed by Section 110 of the National Historic Preservation	See reply below.

	Act (NHPA) or by the regulations implementing Section 106 of the same statute, except via its "protocol agreement" with the California State Historic Preservation Officer. If this agreement (which itself is virtually inaccessible to the public) allows BLM to "comply" with Section 106 without consulting such affected groups as the tribes, rockhounds, OHV people, and hunters, it is a questionable agreement indeed.	

BLM Response to IND-COM-157: Refer to Common Responses Sections 2A , 2B, 2C, 3A, 3D, 4B and 4D. The CCMA Draft RMP/EIS and this PRMP/FEIS identify the CCMA public lands recreation resources in Section 3.1 and cultural resources in Section 3.13. The CCMA Draft RMP/EIS and this PRMP/FEIS identify the impacts of the range of alternatives for CCMA on OHV recreation in Section 4.1 and social and economic values in Seciton 4.15.

The purpose and need statement contained in Chapter 1 (Section 1.1) of the CCMA Draft RMP/EIS and this PRMP/FEIS includes designating areas in CCMA for appropriate recreation opportunities and protecting sensitive natural and cultural resources from impacts due to recreation activities. Listing a traditional cultural property (TCP) to the National register of Historic Places (NRHP) does not afford automatic protection of the TCP for the use of the group that values the TCP, nor does it provide for exclusive use of the TCP.

Section 4.2.1.1 of the CCMA Draft RMP/EIS and this PRMP/FEIS identify assumptions incorporated into the analysis of human helath risks associated with allowable uses in the Serpentine ACEC. Based on the assumption that “Risk calculations for hiking and hunting would be representative of all non-motorized use (i.e. rockhounding)”, the traditional use activities practiced by the Native American community and the rockhounding community would continue to be allowable uses in the Serpentine ACEC undet the BLM’s proposed resource management plan.

Chapter 1 (Section 1.5) details the relationship of the CCMA RMP/EIS to other policies, plans, and programs, including requirements for agency and tribal consultation, as well as public involvement pursuant to NEPA. Chapter 5 (Section 5.2.5) of the CCMA Draft RMP/EIS and this PRMP/FEIS describes the Federal, State, Tribe, and local government consultation and coordination that took place during the preparationof this land use plan for CCMA public lands in compliance with Section 106 of the NHPA.

IND-COM-158	pls include this email in support of Clear Creek being open for OHV use. Our family (wife, young daughter, young son, father) have chose to direct some of our resources (including money in local businesses—about $3,000 per year) in this sport for the quality of family time it provides. No TV’s, no PDA’s, no texting, etc….we are with each other w/o distractions, and, in nature and we appreciate that. As parents, we also use these times as an opportunity to teach our kids to appreciate nature and preserve mother earth.	Refer to Common Responses Sections 3D and 4D.
IND-COM-159	Please reopen Clear Creek to OHV use, rode may Enduros that the Salinas Ramblers & the Timekeepers Motorcycle Clubs put on, motorcyclists are great stewards of the land, thank you for considering my views,	Refer to Common Responses Sections 3A and 3D.
IND-COM-160	The rate at which OHV parks and other legal OHV areas	Refer to Common

	are being closed or otherwise made unavailable to the paying public is sickening. I would greatly value the opportunity to be able to ride a motorcycle somewhere other than private property in the future. Even if it means imposing and/or increasing fees for use, keep clear creek open.	Responses Sections 3A and 3D.
IND-COM-161	I am an active outdoors person with a family of 3 young boys who engage in outdoor activities regularly. I have been visiting the Clear Creak Management area for the past 10 years quite often taking my family there on camping excursions. A friend and I had started mining various rocks in 2007 and shortly after filed a mining claim, which I believe it our right to continue to use. In addition to other outdoor activities such as hiking, fishing, and rock collecting, my family is engaged in recreational motorcycle trail riding. I have used the trails at clear creek for ten years now and profoundly effected by this closure. Due to this closure, I believe my rights are significantly impacted and I will be one of many to fight for my legal use to mine my claim and fight for the right to use the lands in the most logical way…which is to continue to allow OHV use in the CCMA Refer to ORG-TMC & ORG-3ROCKS Comment Summary	Refer to ORG-TMC & ORG-3ROCKS Comment Response
IND-COM-162	I support Alternative B. Alternative B will need future fine tuning, but, it satisfies more of the public's needs. I would like to see the inclusion of public wash rack. Do not restrict ages as mentioned in Alternative C. OHV use is a family activity!	Refer to Common Responses Sections 3A, 4B, and 4D.
IND-COM-163	I wanted to register my request for consideration of access to the Clear Creek Management Area for the recreation of hang-gliding and paragliding on behalf of myself, and several clubs in the San Francisco, San Jose, and Monterey areas. Until the recent closure, we had been flying from Goat Mountain and San Carlos Peak to landing areas outside the CCMA. Although our launch points also lie outside the CCMA boundary, our access had been via R011, R001, and T104 along the interior edge of the CCMA. Our use is very low impact on the CCMA as we only need occasional vehicle access to the Goat Mountain and San Carlos Peak areas to drop off our gear, then leave the CCMA.	Refer to Common Responses Sections 3A and 3D.
IND-COM-164	The BLM needs to correct the report and replace the the words "The result of the study concluded" to "The EPA report indicates the risks are uncertain".	Refer to Common Responses Sections 1D and

		4A.
IND-COM-165	As a user of public lands for recreation, I am strongly opposed to the closure of Clear Creek. In the past I have used this area for OHV recreation and would like to use this area for hunting and OHV use in the future. With the growing population of this state so also grows the need for more available public accessto properties such as Clear Creek. The more area available the safer we can keep these activities and the more we can reduce the impact on any one area. Please consider plea to reopen Clear Creek for recreation.	Refer to Common Responses Sections 3A and 3D.
IND-COM-166	We are writing to make comments on the future disposition of the Clear Creek Management Area. Our comments are both professional, as my wife is a PhD trained epidemiologist, and personal, as I am a horticulturist and both of us are members of the California Native Plant Society, birdwatchers and rockhounds. We attended the meeting on the Clear Creek closure to hear what chances we would have to enter this area and understand that a number of possible outcomes are being considered. From a risk and hazard standpoint, we want to point out two recent articles in the environmental and occupational peer-reviewed literature that point to the difficulty in measuring environmental asbestos risk accurately and the adverse health outcomes of denying people the ability to enjoy the outdoors. 1. Silverstein MA, Welch LS, Lemen R. Developments in asbestos cancer risk assessment. Am J Ind Med. 2009 Nov;52(11):850-8. These researchers are from the Department of Environmental and Occupational Health Sciences, University of Washington School of Public Health, Seattle, Washington. They describe efforts that have been made for the past 25 years to determine valid information on asbestos risk at both the worksite and the community. In a comprehensive review of risk assessments by the EPA, OSHA and NIOSH, these researchers determined that none of the efforts to use statistical models to predict cancer risks from asbestos of different fiber types and sizes were able to overcome limitations of the exposure data. They conclude "Resulting uncertainties have been so great that these estimates should not be used to drive occupational and environmental health policy." We agree, and understand that while occupational health providers and researchers have examined asbestos risks	Refer to Common Responses Sections 1A, 1B, 1C, 1D, 1F(i), 1F(ii), 3D, 4A, and 4D.

	and outcomes for a number of years, these investigations have been based on exposure to specific asbestos fibers within defined closed settings of the occupational site, and not related to recreation in an open area. 2. Harper M. J 10th Anniversary Critical Review: Naturally occurring asbestos. Environ Monit. 2008 Dec;10(12):1394-408. Dr. Harper is from the Exposure Assessment Branch, Health Effects Laboratory Division, of the National Institute for Occupational Safety and Health. He describes the ubiquitous nature of naturally occurring asbestos in a number of areas of the world. While he acknowledges the risk of diseases from high exposures among miners and asbestos products workers, he clearly states that the risk to health of living or being in an area where there are natural occurrences of asbestos minerals is not well proven, and points out that the accepted definitions of asbestos, including dose and mechanisms of measurement, are not clear or well accepted. He concludes "The discovery of asbestos or related minerals has consequences beyond any immediate risks to health, including profound effects on the value of and ability to use or enjoy property." As an epidemiologist, my wife fully understands the scientific mistakes that are made when anecdotal evidence is provided to justify a position (for example, someone who smoked for many years and never got cancer). However, anecdotal evidence can be the start of scientific inquiry; and to date, there has been no anecdotal – much less scientific – evidence of people getting the diseases associated with asbestos from the Clear Creek area or from other naturally occurring outside sites. While difficult to study diseases with long incubation periods, it is possible to do so, and there simply is no evidence in the medical literature to support an excess risk from asbestos in naturally occurring regions. And the fact that California has so much naturally occurring asbestos, one would think that our morbidity and mortality from asbestos-related causes would be higher in the general public, and long ago brought to the attention of public health officials. The statement of Dr. Harper about the effects of people not being able to use or enjoy property embodies the sentiments of many of us who want to enjoy recreation at Clear Creek. There could and should be studies of quality of life issues related to reduced ability to use national lands. For us and for many others, the benefits of being in this unique and special region clearly outweigh the risks –	

	whatever they may be and however they may be measured. We are sure the BLM understands what a special and unusual place Clear Creek really is. If a risk related to recreational exposure to naturally occurring asbestos actually exists, the risk to us personally is extremely low: we are both in our sixties and our exposure while driving in an enclosed auto lowers this yet further. Our interest is in being able to hike and enjoy the area, and having to walk in from the entrance would be difficult if not impossible. While we wish the BLM would reopen Clear Creek entirely, we profoundly hope that we will retain access to the area. Specifically we would think that a minimal access for recreation would include keeping open a circle loop of roads: from Clear Creek Road into the area, meeting the Idria Road that climbs the ridge (allowing access all the way to Spanish Lake) then to T175 that gives access to the California State Gem Mine, meeting the paved road that ends at Sawmill Creek, then completing the loop (through Four Corners and T151) back to the Clear Creek Road. This loop goes through all the geologic, plant and wildlife regions in this magnificent area, allowing enjoyment for rockhounds, native plant folks and bird watchers.	
IND-COM-167	If the dangers are so real and present, why are there NO deaths or health related problems surfacing today? I feel the BLM closed the area to avoid lawsuits that might appears in the future and can't afford to defend themselves from frivolous claims. Just check out the mining records for a real perspective of the risks over the last 100 years. The land should be open to the public with maps provided and supervision supplied by BLM.	
IND-COM-168	Refer to Table X-6: HGMC-FORM Summary & Response.	Refer to Table X-6: HGMC-FORM Summary & Response.
IND-COM-169	I tried to read through the EIS and what I gleaned from it is that this will be one more area that the powers that be are trying to make unavailable to the off road community. I have been on the loosing side of so many of these debates I sometime wonder why I even bother. Then my family suggests that we go riding and it becomes clear to me that I have a responsibility as a father, husband, taxpayer, citizen to fight for me right to the land I pay for. KEEP THE OHV AREAS OPEN PLEASE!!!	Refer to Common Responses Sections 1G.
IND-COM-170	The (EPA Report) designated the 11/02/2004 testing as to have occurred under “moist” conditions despite not one of	Refer to Common Responses Section 1C.

	the soil samples collected on 11/02/2004 actually meeting the specified criteria to be considered "moist", instead they met criteria to be considered "dry". The (EPA Report) did not provide the BLM with any data representing the "moist" season, the very season that the BLM and EPA both state that the most people visit the Clear Creek Management Area. **Therefore the BLM has no asbestos exposure data representing the most popular visitor season at the Clear Creek Management Area, the "moist" (fall/winter/spring) season**. Furthermore the BLM has no data representing "typical" asbestos exposures due to the EPA employees riding their ATV's at excessively high speeds (breaking posted speed-limit) and the employees riding back and fourth through their own dust.	
IND-COM-171	I find it hard to believe that our findings are factual. I would like to think that you would welcome a peer group to come in and do their own study. Since I don't show any effects of asbestos I don't understand why there can't be a compromise. Mybe just red sticker season. That way it can be open for hikers and rockhounds during green sticker season.	Refer to Common Responses Section 1F(iii) and 3A.
IND-COM-172	It is in the best interests of all concerned to manage the area as it has always been. I have been using the area since the middle sixties and have suffered no health issues related to that usage. That means I have used the area about 45 years, making as many as 30 trips a year for various activities at different seasons and have no asbestos related problems. In addition, the lands in question were set aside for the people of the United States of America to enjoy and recreate on. Clear Creek is the last remaining land of it's type and the only place close enough to the Central Valley and the Bay Area for the multiple uses that are allowed there. I'm old enough to remember when the Panoche Hills were closed to use. It was only going to be for "a little while" and then the area would be open again. Same thing with Tumey Hills and The Griswold area. Well, we saw how that worked out. I ask that the Clear Creek area be managed as it has been with signs warning of the asbestos in the area and let people decide if they want to use the area or not. It should be the users decision to use it or not instead of the government telling the people what to do and how to live.	Refer to Common Responses Sections 1F(i), 3A, and 3D.
IND-COM-173	I question many of the base assumptions and I am very much concerned with the approach used in your draft environmental statement (DEIS) wherein you consider all types of naturally occurring asbestos as being of equal	Refer to Common Responses Sections 1A, 1B, 1C, 1D. 1F(i), 3A,

	health risk, when there is growing evidence that such is not the case, and those risks being based on occupational health studies involving manufacturing of and manufactured asbestos products. I do not think, as it has not been demonstrated, that all serpentine soils exhibit the same toxicity as assumed in your consideration of alternatives, and I do not believe the occupational health studies you cite are applicable to the very limited exposures that might be encountered during my occasional visits within the CCMA. The DEIS fails to identify or cite any actual case where an individual has contracted any of the negative health conditions as a result of exposure to serpentine soils. My use of the CCMA certainly does not fit within the parametric assumptions used in EPA's Risk Analysis study with regard to acceptable exposure levels, nor with actual real life experiences of those who have used the CCMA. EPA's suggested acceptable death rate for cancers from exposures to asbestos is 1 in 10,000. The EPA proposed acceptable cancer risk rates are what the EPA has used in the past for people, who because of their occupation, or where they live, are exposed to asbestos in a continuous and cumulative manner and is not an appropriate value for occasional educational and recreational activities where persons, well informed of the potential risk, do so of their own free will. Many people who have lived and recreated in the CCMA for long periods of time have commented, over and over, that they have not seen any of their contemporaries developing cancers or long term diseases for which asbestos exposures are known causes. It is by no means certain that such limited individual access as mine will ever come close to the cumulative exposures suggested in the EPA Risk Assessment study. Rather than arbitrary restriction of access into the CCMA, I feel strongly that there are better means of mitigation of the perceived hazard. I assume the BLM is well aware of the studies showing that overlaying of existing serpentine soil roads with nonserpentine gravels or other surface treatments can reduce the amount of natural occurring airborne asbestos particles raised by vehicular travel on such roads by as much as 98%. (Seç California Department of Toxic Substances: "Study of Airborne Asbestos from a Serpentine Road in Garden Valley, California"). This is a sensible, effective and inexpensive	3D, 4A, and 4D

	means of abatement, and I am curious as to why, if the concern here is primarily about asbestos exposure, has not the Clear Creek Road been so graveled and maintained in the past. I believe that the Federal Land Policy Act of 1976, as amended, would dictate that BLM provide safe passage of the public land to users along public roads to meet the management goals outlined in your governing legislation and congressional intent. The section of the Clear Creek Road along the creek and some of the campgrounds associated with this road, which receives the bulk of public use, should be the primary candidate for remedial treatment, in keeping with the Federal Land Policy Act. This would help all users of the CCMA, including BLM personnel in administering their duties in the CCMA. I see no reason that non-serpentine soils or gravels or other type treatments cannot be done to surface the existing roadways and campgrounds. For those roads and trails where it is not practicable to provide surface treatment, I would suggest that the BLM develop a permit system for general public use based on user age and the frequency of access to the CCMA. The establishment of such dosage limits for exposures where potential hazards are identified is a common environmental and health safety practice. When I visit the CCMA, I usually stop in either Coalinga or Hollister and purchase fuel and supplies for camping for which I usually spend approximately $125. Your DEIS estimates future use of the CCMA of 50,000 visitor use days. At $125 per visitor use day that is $ 6,250,000 dollars lost to the local economies per year, if you close access to users of the CCMA. This is a tremendous social and economic loss not accounted for in your DEIS. In that regard your DEIS is legally insufficient. Alternatives D and E in your DEIS are also not real alternatives, since implementing those alternatives would require another EIS. Those Alternatives would also open new areas to soil erosion. Again your DEIS is legally insufficient. Alternative E allows limited vehicle access from New Idria to Wright Mountain with surface treatment of only that particular road. Why is just this road the only one considered for surface treatment? Why not the Clear Creek Road? Again, your DIES is legally insufficient.	
IND-COM-174	I've been riding there for 30 years with my family, friends, and club members; and we spend money down there. Hollister Hills is very over busy with bikes and is	Refer to Common Responses Sections 4B and

	very dangerous.	4D.
IND-COM-175	I strongly believe that we need to keep our existing ohv areas open. We only have so many places to ride as it is. Close clear creek and we just send more into illegal forests to ride.	Refer to Common Responses Section 4B.
IND-COM-176	I have gone to clear creek to ride as long as i can remember... It is very important to have places for off road motorcycles and recreational activity... I do not suffer from any health problems of any kind... We must have land like this for this kind of usage.... Can we please have some common sense reasoning...	Refer to Common Responses Sections 3A, 3D, and 4B.
IND-COM-177	By modifying the language of the initial EPA environmental exposure report, the BLM severely compromised the integrity of the report. Therefore any actions taken utilizing this report as guidance are flawed from the starting point. BLM failed to disclose that the locations to be tested were historical industrial dump sites. The results of the tests themselves are questionable as the EPA failed to track the location of the field agents collecting data to be used in the final report. Even if testing results yielded valid information, the data still would not be applicable as it does not take into consideration the nature of exposure that visitors to the CCMA will experience on site. Forcing an industrial asbestos exposure model where it does not fit completely discredits EPA as well as the BLM as it simply appears that the current BLM agenda to close the CCMA must be afforded at all costs. People recreating in Clear Creek are not engaging in 40 hour work weeks there. There is a total lack of physical evidence to support the actions of the BLM and this speaks louder than any study or claim made by the EPA regarding the environmental dangers associated with Clear Creek. To date, not one single report of illness or death has ever been presented by any party within the pervue of this closure. Motorcycle shops, restaurants, gas stations and supermarkets have all felt the impact of this closure and in a devastated economy, the closure may well sound the death knell of many honest American small businesses. This is a shameful legacy the BLM has not taken any interest in outside of the prerequisite public meetings that are required by law.	Refer to Common Responses Sections 1C, 1D, 1F(i), 3A, 4B, and 4D.

	With the notable exception of Alternative "A", the BLM has failed to put forth a suitable remedy that does not either severely restrict or force a total prohibition of motorized recreation in the CCMA. This is contrary to the parks original chartered purpose. The closure of Clear Creek has resulted in dangerous congestion of the very few remaining off road parks that remain open. Head on collisions are up and the ability to maintain trails and paths is becoming difficult from over use. This is creating an unsustainable environment in which too many riders are confined in small spaces and the end result is physical injuries and damage to the trail systems in the parks themselves.	
IND-COM-178	I would like to express my desire to have the Clear Creek Management area kept open for limited recreational use. I believe the studies used as a basis for closure are flawed in that they only take maximum exposure into account. No recreational users or management personnel have ever been diagnosed with any asbestos-related diseases. OHV use, which does have significant impact, asbestos aside could be relocated to nearby areas outside the area of elevated asbestos. Other recreational activities such as hunting, rockhounding, birdwatching and hiking have a much more minimal impact.	Refer to Common Responses Sections 1C, 1D, 1F(i), 3A, 3C, and 3D.
IND-COM-179	I belong to two rockhound clubs: San Francisco Gem and Mineral Society, and the Sequoia Gem and Mineral Society. It has come to my attention that you intend to close the Clear Creek area because of "asbestos" in the area. Also found in the area are rocks that are Serpentine, as well as other minerals. Rockhounds have been going to the area for years and banning the area because of only one suspect mineral is not reasonable. Benitoite, which is a rare mineral, is found in only this area, and is mentioned in several Rock books. This is an important area for collecting and studying our earth and I hope you reconsider your thoughts in this manner and allow access to this area for future use.	Refer to Common Responses Section 3D.
IND-COM-180	I wanted to share how unfair I believe it is to close Clear Creek for ever. Public Lands are important to our History.	Comment noted.
IND-COM-181	We have fun out there. Open it all back up.	Comment noted.
IND-COM-182	[Clear Creek] needs to be reopened to the public. It is hurting the local economie and the over state budget	Refer to Common Responses Section 4D.
IND-COM-183	The new proposed restrictions are a slap in the face to the hard working American families that have paid for & enjoyed these public lands for generations. With the expanding population of people wanting access to their	Refer to Common Responses Sections 4B and 4D.

	public lands , closing or restricting access just increases the overuse of the few areas that remain open. The American public needs more access, not less. The majority of us also do not require any new structures, signs, parking lots, roads or improvements, we just want sensible access to our lands.	
IND-COM-184	The BLM used an EPA report is based on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek. The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to reconsider projected exposure levels for recreational visitors, as compared to studies of occupational workplace exposure. There are no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. BLM employees spend more time in the area than recreational visitors. If employees are not experiencing health related asbestos issues then there must not be any real health risk. Actual health risks are much lower than those estimated in the CCMA assessment since the area doesn?t have the same exposure levels as studied in occupational examples. The DEIS must consider the uncertainty rather than using worst case scenarios. The EPA report is flawed and should not be relied upon for the agency?s decision to enact a closure of the CCMA to all public use.	Refer to Common Responses Section 1C, 1D, 1F(i), and 4A..
IND-COM-185	I would like to express my feelings as a Geologist with 3 degree's and have been collecting minerals in the Clear creek area since I graduated high school in Danville CA in 1977. Makes me 50+ years old now collecting jade and gems and minerals for 33 years there. What I would like is unrestricated access to where I have been going for the past 33 years without having to fill out forms and pay more money. I don't understand the closure legal formalities I am a field geologist. I have many physical ailments but luckely so far my lungs are strong partly due to hiking and packing out rocks in the clean mountain air	Refer to Common Responses Section 3D.

	and swimming in the streams. I do see an issue with the installment of multiple staging area's designed to promote ohv use and then subsequntly denying that use to the public of public lands. I do believe that the dust is potentially harmful and people should not breath dirt. The children should be protected and aware of the hazards. The dirt bikers are a nusance to me during my mineral collecting and I don't like their presense but I believe they have there rights to access. I belong to the Calaveras gem and mineral society and we must all adhere to a code of ethic's for mineral collecting. So please do what you will but let me do what I do best, collect, process and beautify peoples lives with gems. I do 40 trade shows a year, been selling as California Mineral Company since 1982 and power seller on ebay, Doing my job to promote the ecomony and generate out of state dollars. So I would appreciate a special use permit or some type of unrestricted access permit.would be my ideal situation,	
IND-COM-186	I have read the report that closed Clear Creek. According to the Federal Government, unproccessed espstose can not harm, nor endanger any one. The report actually stated the levels, and they are low enough. Victoms of nemponiliom from Clear Creek really exist? It wasn't from some place they worked, or a school they went to? I have worked in the trades almost my entire life, and I have seen more espestose in schools, public buildings government offices, and Hospitals. That's the bad stuff, processed. How many cases have actually been related to Clear Creek, New Idria area. or can it be proved? It can't. I grew up having the hills of Prunedale to ride in with out a problem. The generation before me did as well. Those guys had no real problems, minus the drunks, and a few vets had drug issues, but it gave us an outlet, and some thing constructive to do with our time. Kids now days don't have that, just better vidoe games and better t.v. to watch. I guess my total point is, please stop take what little we have to do away. If its posted that possibly this could happen, fine. Let the public make there own decisions, and give some of our tax paying privlegdes back. If we want to smoke, ride, eat dirt, or what have you, lets do it on our own, not with someone dictating what we can do.	Refer to Common Responses Section 1G.
IND-COM-187	We would vote for plan b.	Comment noted.
IND-COM-188	I do not understand why the area had to be closed. I used to live in the North East and when fishing we all knew to limit our consumption because of the mercury contamination of the fish. There was never a thought of not allowing any fishing and I can not understand why asbestos warnings would not be sufficent.	Refer to Common Responses Section 3A and 3D.
IND-COM-189	As part of the federal government the BLM should take	Refer to Common

	the same course of action with the Clear Creek Management Area that it has with the tobacco industry. Each year more people die of the affects of tobacco use than from any activity at Clear Creek. The alternative which leaves Clear Creek as is and promotes educating the public on the risks of activity in the area is consistent with how the federal government handles tobacco. Each year thousands of people are killed or injured from the effects of alcohol. How has the government handled this? They have not banned alcohol use. They have established limits on blood alcohol levels. How have they enforced this? They leave it up to the individual to decide when they have had enough. They do not physically track how much you are drinking they only enforce the rules after the fact. What course of action should the BLM take? They should follow the same pattern that has been set by the federal government. Educate the people on the risks associated with activity in the Clear Creek Management Area and let them decide if the risk is worth taking. Don't put a limit on how much time can be spent in the area, let the individual decide when they have had enough. Please apply the same standards to the Clear Creek Management Area that federal government has applied to the tobacco and alcohol industry. Let us choose for ourselves. Let us ride.	Responses Section 3A and 3D.
IND-COM-190	I have ridden motorcycles at Clear Creek since 1984. I am well aware of the asbestos problem and ride when the terrain is damp or wet and the dust is not a problem. Clear Creek should not be closed because someone else thinks it may be a health hazard! Our family of friends share my feelings and have always held Clear Creek as the Premier riding area in the State of California!!!	Refer to Common Responses Sections 1D, 3D, and 4A.

Table X-5; Form Letter Author List (Written and e-mail)

Extend Public Comment Period Form Letter

Comment Code	Commenter
EXT-COM-01	Alex Wagner-Jauregg
EXT-COM-02	Andrew Hagen
EXT-COM-03	Arago, Alec
EXT-COM-04	Barry Siebenthall
EXT-COM-05	Bill Charles
EXT-COM-06	Brian Dean
EXT-COM-07	Brian Jansen
EXT-COM-08	charlie hartmetz
EXT-COM-09	CHUCK MONASMITH
EXT-COM-10	Cory Borovicka
EXT-COM-11	David Furrer
EXT-COM-12	david taylor
EXT-COM-13	ED SANTIN
EXT-COM-14	Eric Buchner
EXT-COM-15	Ernie Salle
EXT-COM-16	Garcia, Anson
EXT-COM-17	Tom Keith
EXT-COM-18	home
EXT-COM-19	Justin Hensley
EXT-COM-20	John F. Humphries
EXT-COM-21	Jason Weihe
EXT-COM-22	Jeff Davies
EXT-COM-23	Jeff Peterson
EXT-COM-24	Jeff Steiner
EXT-COM-25	Jennifer Schreck
EXT-COM-26	Jerry
EXT-COM-27	Jim & Laurie Carrick
EXT-COM-28	John Spaulding
EXT-COM-29	John W.
EXT-COM-30	Jon Lee
EXT-COM-31	Justin Hensley
EXT-COM-32	Wayne Berry
EXT-COM-33	Ware-Rachels, Christine
EXT-COM-34	Tom Stillman
EXT-COM-35	Tim Kerber
EXT-COM-36	suzbandit987
EXT-COM-37	Steve Hatch
EXT-COM-38	Steve Farinelli
EXT-COM-39	Sean Biggs
EXT-COM-40	Christopher G. Rudy Esq.
EXT-COM-41	Robert Morris
EXT-COM-42	Robert Henry
EXT-COM-43	Ray McCaskey
EXT-COM-44	Neil Schmidt
EXT-COM-45	kga125
EXT-COM-46	Ken Clarke
EXT-COM-47	Justin Kulikov
EXT-COM-48	JOSEPH C FISHER
EXT-COM-49	Jon Heyliger
EXT-COM-50	John Bengtson
EXT-COM-51	Jodi Collins
EXT-COM-52	Jeff Wiley
EXT-COM-53	Jeff Schulz
EXT-COM-54	Justin Hensley
EXT-COM-55	George Portugal
EXT-COM-56	Frank Schweininger
EXT-COM-57	Frank Nye
EXT-COM-58	Nick Harris
EXT-COM-59	Evan Jessee
EXT-COM-60	Durinda Thomas
EXT-COM-61	Daniel Epper
EXT-COM-62	Curtis Matthews
EXT-COM-63	Bob Wilson
EXT-COM-64	Andrew Lesslie
EXT-COM-65	John Ruiz
EXT-COM-66	Andrew Hagen
EXT-COM-67	Dave Pickett
EXT-COM-68	Robert Hale
EXT-COM-69	Anson Garcia

EXT-COM-70	Ken Flores
EXT-COM-71	Kimiko Lauris
EXT-COM-72	kyle newman
EXT-COM-73	Ladd Johnson
EXT-COM-74	Howard L Hughes
EXT-COM-75	Mark Norman
EXT-COM-76	melissa allen
EXT-COM-77	Michael Miller
EXT-COM-78	Michael Studzinski
EXT-COM-79	mike monroe
EXT-COM-80	Murray, Jaclyn
EXT-COM-81	Nick Avakian
EXT-COM-82	Paul Toepel
EXT-COM-83	Steve Brown

EXT-COM-84	Ric Williams
EXT-COM-85	Rick Field
EXT-COM-86	Rigby, Greg
EXT-COM-87	Rob Stuart
EXT-COM-88	Shawn Williams
EXT-COM-89	Tim Cecil
EXT-COM-90	THURMAN CREEL JR
EXT-COM-91	Tim Field
EXT-COM-92	Tim Stockwell
EXT-COM-93	Todd Mansfield
EXT-COM-94	tony smith
EXT-COM-95	William McGibbon
EXT-COM-96	William Ow
EXT-COM-97	Ed Poe

Save the Trails Form Letter

Comment Code	Commenter
STT-FORM-01	Aaron Davis
STT-FORM-02	ahmed nasus
STT-FORM-03	AJ BILA
STT-FORM-04	Al Larrus
STT-FORM-05	Alex Seyedi
STT-FORM-06	Allen Marker
STT-FORM-07	Alton Tuttle
STT-FORM-08	Andres Caicedo
STT-FORM-09	Andrew Dickson
STT-FORM-10	andrew speights
STT-FORM-11	Ann Branch
STT-FORM-12	Anthony Rodriguez
STT-FORM-13	Bagwell, Wright
STT-FORM-14	Ben Brookens
STT-FORM-15	Ben Russell
STT-FORM-16	benny king
STT-FORM-17	Beverly Ashley
STT-FORM-18	bill naps
STT-FORM-19	BILLY WALTRIP
STT-FORM-20	Blake Bogner
STT-FORM-21	Bob Balunda
STT-FORM-22	bobby naps

STT-FORM-23	Brad Kerr
STT-FORM-24	Bradley Nevins
STT-FORM-25	Brain Svec
STT-FORM-26	Brenda Hoard
STT-FORM-27	Brian Faris
STT-FORM-28	Brian Fraser
STT-FORM-29	Brian Wright
STT-FORM-30	Brion McHale
STT-FORM-31	Bruce Boring
STT-FORM-32	Bruce Leighton
STT-FORM-33	Bruce Hendrickson
STT-FORM-34	Bryan Manternach
STT-FORM-35	Bryan Parkin
STT-FORM-36	Carl Anderson
STT-FORM-37	Casey Crandall
STT-FORM-38	Chad Delany
STT-FORM-39	Charles Hirst
STT-FORM-40	Charles Polan
STT-FORM-41	charlie williams
STT-FORM-42	Chris burnett
STT-FORM-43	chris cameron
STT-FORM-44	Chris Milligan
STT-FORM-45	Christina Wilson

STT-FORM-46	Chuck Worley
STT-FORM-47	Cindy Hursh
STT-FORM-48	Com Chewy
STT-FORM-49	craig hodges
STT-FORM-50	Craig Jelich
STT-FORM-51	CTVA Action Committee
STT-FORM-52	Dale Barkhoff
STT-FORM-53	Dan LaMere
STT-FORM-54	Dan Thomson
STT-FORM-55	Daniel Fukai
STT-FORM-56	DANIEL JENNIFER WINES
STT-FORM-57	Darryl Sheets
STT-FORM-58	Dave Pickett
STT-FORM-59	Dave Seghi
STT-FORM-60	David Blau
STT-FORM-61	David Cherniss
STT-FORM-62	David Fowley
STT-FORM-63	David Grogan
STT-FORM-64	David Olaveson
STT-FORM-65	DAVID OLSON
STT-FORM-66	David Trevisan
STT-FORM-67	David Vaassen
STT-FORM-68	David Wasson
STT-FORM-69	David Wheeler
STT-FORM-70	Dean Corbella
STT-FORM-71	Dean Whiteside
STT-FORM-72	Denis Van Gundy
STT-FORM-73	Dennis Engelhardt
STT-FORM-74	Dennis Scroggins
STT-FORM-75	Derrick Morris
STT-FORM-76	Devin Carter
STT-FORM-77	Dick Coppcok
STT-FORM-78	Dodd Stange
STT-FORM-79	Dodd Stange
STT-FORM-80	Don Barich
STT-FORM-81	Don Fukushima
STT-FORM-82	Donald Gerber
STT-FORM-83	Doug Conner
STT-FORM-84	Doug Holcomb

STT-FORM-85	Doug Machado
STT-FORM-86	Earle Cummings
STT-FORM-87	Ellen Amador
STT-FORM-88	Emile Estassi
STT-FORM-89	Eric Benson
STT-FORM-90	Eric Buchner
STT-FORM-91	Eric Komrosky
STT-FORM-92	Eric Orrill
STT-FORM-93	Eric Wilson
STT-FORM-94	Erik Schaffer
STT-FORM-95	Frank Nye
STT-FORM-96	Frank Vest
STT-FORM-97	Garrett Lewis
STT-FORM-98	Gary Hendricks
STT-FORM-99	Gary Otremba
STT-FORM-100	Geoffrey Tobin
STT-FORM-101	Gerard Shuba
STT-FORM-102	Gina Johnson
STT-FORM-103	Gino Fortunato
STT-FORM-104	Glen Anderson
STT-FORM-105	Glen Coddington
STT-FORM-106	Greg Matthews
STT-FORM-107	Greg McNeil
STT-FORM-108	Greg Taylor
STT-FORM-109	Harvey Bye
STT-FORM-110	Heidi Murphy
STT-FORM-111	Richard Hoppe
STT-FORM-112	Howard Jones
STT-FORM-113	Bart Milam
STT-FORM-114	J. Braun
STT-FORM-115	J. Muhlestein
STT-FORM-116	Jack Davies
STT-FORM-117	Jack Traver
STT-FORM-118	Jacqueline Machado
STT-FORM-119	Jacquelyn Iddings
STT-FORM-120	Jacquelyne Theisen
STT-FORM-121	Jake Beckett
STT-FORM-122	James jackson
STT-FORM-123	James Miller
STT-FORM-124	JAMIE DATAN
STT-FORM-125	Jamison Burchfield

STT-FORM-126	Jamison Donato
STT-FORM-127	Janette Damaso
STT-FORM-128	Jason Eickhoff
STT-FORM-129	jason herbig
STT-FORM-130	Jason Wise
STT-FORM-131	Jay Peterson
STT-FORM-132	Jeff Davies
STT-FORM-133	Jeff Hayes
STT-FORM-134	jeff johnson
STT-FORM-135	Jeff Kasper
STT-FORM-136	Jeff Ossman
STT-FORM-137	Jeff Radtke
STT-FORM-138	Jeff White
STT-FORM-139	Jeffrey Lewis
STT-FORM-140	Jeffrey Sebern
STT-FORM-141	jeffrey strutz
STT-FORM-142	JENNIFER CASO
STT-FORM-143	Jerry Marsh
STT-FORM-144	Jerry Sparkman
STT-FORM-145	jesse ziegler
STT-FORM-146	Jim Bowsher
STT-FORM-147	Joe Gomes
STT-FORM-148	Joe DiSalvo
STT-FORM-149	joe reisinger
STT-FORM-150	Joe Workman
STT-FORM-151	Joel Becher
STT-FORM-152	John Aiton
STT-FORM-153	John Alexander
STT-FORM-154	John Brown
STT-FORM-155	John Davis
STT-FORM-156	John Gauldin
STT-FORM-157	John Maloy
STT-FORM-158	John Ortiz
STT-FORM-159	John Martin
STT-FORM-160	Johnny Cox
STT-FORM-161	jon berkhemer
STT-FORM-162	Jon Bui
STT-FORM-163	Jose Acevedo
STT-FORM-164	Joseph Nufer
STT-FORM-165	Joseph Wilkiemeyer
STT-FORM-166	Josh Davis

STT-FORM-167	Jason P. Howell
STT-FORM-168	Justin Kulikov
STT-FORM-169	Kade Hendrick
STT-FORM-170	Karen Marsh
STT-FORM-171	Kay Hadland
STT-FORM-172	Keith Schreck
STT-FORM-173	Ken Flores
STT-FORM-174	Ken Perkins
STT-FORM-175	Kevin Bak
STT-FORM-176	Kevin Beller
STT-FORM-177	kevin Hedrick
STT-FORM-178	Kevin Liles
STT-FORM-179	Kirk Demarest
STT-FORM-180	Kirk Harris
STT-FORM-181	James Culver
STT-FORM-182	Les Brekke
STT-FORM-183	Ladd Johnson
STT-FORM-184	Larry Beardslee
STT-FORM-185	Larry Garrido
STT-FORM-186	laymon bunch
STT-FORM-187	Leonard Young
STT-FORM-188	Linda Chen
STT-FORM-189	Lois Kobayashi
STT-FORM-190	Lon Hadland
STT-FORM-191	Lou St.George
STT-FORM-192	Lowell Webb
STT-FORM-193	MANUEL DATAN
STT-FORM-194	Marcia Gibbs
STT-FORM-195	Mark Benzinger
STT-FORM-196	Mark Harris
STT-FORM-197	Mark Hvass
STT-FORM-198	Mark Meulpolder
STT-FORM-199	Mark Mulliner
STT-FORM-200	Mark Olund
STT-FORM-201	Matt Angier
STT-FORM-202	matt beck
STT-FORM-203	Matt Leighton
STT-FORM-204	Matt Ruiz
STT-FORM-205	Matthew Ruiz
STT-FORM-206	Michael Damaso
STT-FORM-207	Michael Garrett

STT-FORM-208	Michael Lompart
STT-FORM-209	Michael Scott
STT-FORM-210	Michael Scruggs
STT-FORM-211	michael Shuck
STT-FORM-212	Michael Studzinski
STT-FORM-213	Miguel Flores
STT-FORM-214	Mike Adams
STT-FORM-215	Mike Bohnhoff
STT-FORM-216	Mike Chaplin
STT-FORM-217	MIke colsell
STT-FORM-218	mike locke
STT-FORM-219	mike naps
STT-FORM-220	mike orr
STT-FORM-221	mike rustay
STT-FORM-222	Mike Wubbels
STT-FORM-223	mountain miller
STT-FORM-224	Nate DeLaney
STT-FORM-225	Nick Johnson
STT-FORM-226	Greg Burns
STT-FORM-227	Oscar Wahlberg
STT-FORM-228	Patrick McCaleb
STT-FORM-229	PAUL BUCHKOVICH
STT-FORM-230	Paul Hawthorne
STT-FORM-231	Paul Henry
STT-FORM-232	Paul Kobayashi
STT-FORM-233	Paul Ward
STT-FORM-234	Paul White
STT-FORM-235	William G. Ward
STT-FORM-236	pete hunter
STT-FORM-237	Pete Tanzillo
STT-FORM-238	Peter Cassidy
STT-FORM-239	Peter Sakai
STT-FORM-240	Peter, Keith E
STT-FORM-241	Philip Wunderle
STT-FORM-242	R Bruce Leighton
STT-FORM-243	Randy Norton
STT-FORM-244	Randy Frint
STT-FORM-245	Ray Iddings
STT-FORM-246	Raymond Kirchner
STT-FORM-247	Rebekah Hermann
STT-FORM-248	Regentine, Russell

STT-FORM-249	Renae Virden
STT-FORM-250	Rhonda Mumm
STT-FORM-251	Richard Adan
STT-FORM-252	Richard D. Pankey
STT-FORM-253	Richard Dent
STT-FORM-254	Richard Eidsmoe
STT-FORM-255	Richard Marlin
STT-FORM-256	Rick Guidice
STT-FORM-257	Robert Adams
STT-FORM-258	Robert Burson
STT-FORM-259	Robert Castelhano
STT-FORM-260	Robert Condra
STT-FORM-261	Robert H Leighton II
STT-FORM-262	Robert Howard
STT-FORM-263	Robert Pushwa
STT-FORM-264	robert smith
STT-FORM-265	Roger Pennington
STT-FORM-266	Ronald MAITREJEAN
STT-FORM-267	Ronald Wilcher
STT-FORM-268	Rory Dow
STT-FORM-269	Ryan Raymond
STT-FORM-270	Amy Delaney
STT-FORM-271	Scott Johnston
STT-FORM-272	scott sinclair
STT-FORM-273	Sean Greer
STT-FORM-274	Shawn Baker
STT-FORM-275	shawn harvey
STT-FORM-276	Sherri Broome
STT-FORM-277	skip zierolf
STT-FORM-278	Stacie Albright
STT-FORM-279	Stephen Dix
STT-FORM-280	Stephen Smith
STT-FORM-281	Stephens,Mike
STT-FORM-282	Steve Boardman
STT-FORM-283	Steve Christensen
STT-FORM-284	Steve Egbert
STT-FORM-285	Steve Farinelli
STT-FORM-286	Steve Wright
STT-FORM-287	Steven Esau
STT-FORM-288	Terry Nimmo
STT-FORM-289	Thomas Bank

STT-FORM-290	Thomas Amador
STT-FORM-291	Thomas Ketter
STT-FORM-292	Thomas Neu
STT-FORM-293	Thurman Creel Jr
STT-FORM-294	Tim Clark
STT-FORM-295	Tim McDowell
STT-FORM-296	Tim Richards
STT-FORM-297	tom keith
STT-FORM-298	tom taflin
STT-FORM-299	Tomi Johnson
STT-FORM-300	Tony McCants
STT-FORM-301	Travis Franz
STT-FORM-302	Travis Patzkowsky
STT-FORM-303	Jon & Tammie Wilcox
STT-FORM-304	Troy Weis
STT-FORM-305	URIEL COLLETT
STT-FORM-306	Vince LaROcca

STT-FORM-307	Wade Wilson
STT-FORM-308	Walter Koch
STT-FORM-309	Warren Krause
STT-FORM-310	Wesley Paik
STT-FORM-311	William Auth
STT-FORM-312	William Burwell
STT-FORM-313	william charles
STT-FORM-314	William Hoard
STT-FORM-315	william jensen sr
STT-FORM-316	William Lyttle
STT-FORM-317	william meilandt
STT-FORM-318	William Willis
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Center for Biological Diversity Form Letter

Comment Code	Commenter
CBD-FORM-01	A Davis
CBD-FORM-02	A Lotsch
CBD-FORM-03	A R
CBD-FORM-04	A. Guderian
CBD-FORM-05	A. Iturrioz
CBD-FORM-06	A. Rhodes
CBD-FORM-07	A. S. Evans
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CBD-FORM-10	Aaeron Robb
CBD-FORM-11	Aaron Ucko
CBD-FORM-12	Aaron Ximm
CBD-FORM-13	Abby Bline
CBD-FORM-14	Abigail Gindele
CBD-FORM-15	Adam Brazil
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CBD-FORM-25	adrian stubblefield
CBD-FORM-26	Adrianne Vasey
CBD-FORM-27	Adrienne Dollyhigh
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CBD-FORM-30	Aileen O'Brien <
CBD-FORM-31	Aimee Gintz
CBD-FORM-32	aj pierre-louis
CBD-FORM-33	Akebono Airth
CBD-FORM-34	Akira Asada
CBD-FORM-35	Al Anderson
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CBD-FORM-43	Alan Wojtalik
CBD-FORM-44	Alana Davis
CBD-FORM-45	Albert Fecko
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CBD-FORM-48	Alberta Householder
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CBD-FORM-51	Alejandra Vega
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CBD-FORM-53	Aleksandra Cieslak
CBD-FORM-54	Alessander Botti Benevides
CBD-FORM-55	Alessandro Zabini
CBD-FORM-56	Alex Balboa
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CBD-FORM-61	Alexandra Scarborough
CBD-FORM-62	Alexandra Sipiora
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CBD-FORM-	Ali Hotmer

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CBD-FORM-65	Alice Green
CBD-FORM-66	Alice Keyes
CBD-FORM-67	Alicia Liang
CBD-FORM-68	Alicia Williams
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CBD-FORM-70	Alicie Warren
CBD-FORM-71	alikona bradford
CBD-FORM-72	alina dollat
CBD-FORM-73	Alisa Polk
CBD-FORM-74	Alison Halm
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CBD-FORM-76	Alison Tyler
CBD-FORM-77	Alison Voss
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CBD-FORM-83	allison saft
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CBD-FORM-85	Alta Bardsley
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CBD-FORM-87	Alys G
CBD-FORM-88	Alyssa Freeman
CBD-FORM-89	Amanda Clairmonte
CBD-FORM-90	Amanda Layton
CBD-FORM-91	Amanda Levesque
CBD-FORM-92	Amanda Lowe
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CBD-FORM-94	Amanda Pekin
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CBD-FORM-	Amber Dudkowski

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CBD-FORM-98	AMBER GILCHRIST
CBD-FORM-99	AMBER TASCHNER
CBD-FORM-100	Ambrey Nichols
CBD-FORM-101	ami ringler
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CBD-FORM-103	Amy Anderson
CBD-FORM-104	Amy Bergmann
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CBD-FORM-117	Ana Lee
CBD-FORM-118	AnaLisa Crandall
CBD-FORM-119	Andrea Levy
CBD-FORM-120	Andrea Pike
CBD-FORM-121	Andrea Todd
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CBD-FORM-124	Andrew Bezella
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CBD-FORM-	Andrew Tate

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CBD-FORM-134	Andy Philpot
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CBD-FORM-148	Anita Das
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CBD-FORM-150	Ann Bartell
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CBD-FORM-162	Anna Galanos
CBD-FORM-163	anna hill
CBD-FORM-164	Anna Paz
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CBD-FORM-168	annalisa ostehout
CBD-FORM-169	Anne Bornholdt
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CBD-FORM-171	Anne Ramsey
CBD-FORM-172	Anne White
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CBD-FORM-175	annette guerrero
CBD-FORM-176	annick baud
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CBD-FORM-186	April Downing
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CBD-FORM-189	April Jean-Baptiste
CBD-FORM-190	april mosen
CBD-FORM-191	Apryl Mefford-Hemauer
CBD-FORM-192	arlene dreste
CBD-FORM-193	Arlene Malkin
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CBD-FORM-	Aron Shevis

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CBD-FORM-197	aron shevis
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CBD-FORM-201	Arthur Lapite
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CBD-FORM-203	Artineh Havan
CBD-FORM-204	Ashley Coburn
CBD-FORM-205	Ashley Falkenstein
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CBD-FORM-208	Athena Batsios
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CBD-FORM-212	Audra Harding

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CBD-FORM-231	Barbara Leland
CBD-FORM-232	Barbara Lester
CBD-FORM-233	Barbara McClain
CBD-FORM-234	Barbara Rosenkotter
CBD-FORM-235	barbara russo-salcines
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CBD-FORM-253	Benita Crow
CBD-FORM-254	Benjamin Reynolds
CBD-FORM-255	Benjamin Schlumpp
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CBD-FORM-257	bernard hochendoner
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CBD-FORM-262	Beth Ryan
CBD-FORM-263	Bettie Paradis
CBD-FORM-264	Betty J. Van Wicklen
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CBD-FORM-266	Betty Walters
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CBD-FORM-270	Beverly Conway
CBD-FORM-271	Beverly Pott
CBD-FORM-272	Bill Haskins
CBD-FORM-273	Bill Herrera
CBD-FORM-274	bill nierstedt
CBD-FORM-275	bill Slowinski
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CBD-FORM-277	Bill Weber
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CBD-FORM-279	Bob Brister
CBD-FORM-280	Bob Haugen
CBD-FORM-281	Bobbie Flowers
CBD-FORM-282	bobbie kraft
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CBD-FORM-284	Bonnie Barfield
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CBD-FORM-288	bonnie spromberg
CBD-FORM-289	Boyce Sherwin
CBD-FORM-290	brad lagorio
CBD-FORM-291	Brad Martin
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CBD-FORM-293	Brandi McCauley
CBD-FORM-294	Brenda Colbert
CBD-FORM-	Brenda Tarkowski

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CBD-FORM-297	brendan fisher
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CBD-FORM-299	Brent Koenig
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CBD-FORM-301	Brian & Rita Cohen
CBD-FORM-302	Brian Cumber
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CBD-FORM-304	Brian Flores
CBD-FORM-305	Brian Gallagher
CBD-FORM-306	Brian Gong
CBD-FORM-307	Brian Houser
CBD-FORM-308	Brian Krahmer
CBD-FORM-309	Brian Kummer
CBD-FORM-310	brian yanke
CBD-FORM-311	brianna Frachtman

CBD-FORM-312	Brianne Costello
CBD-FORM-313	Bridget Greuel
CBD-FORM-314	Brie Schmidt
CBD-FORM-315	Brittany Allison
CBD-FORM-316	Brittany B
CBD-FORM-317	Brittany Cardon
CBD-FORM-318	Brittany Dolan
CBD-FORM-319	Brittany Porter
CBD-FORM-320	Brooke Harris
CBD-FORM-321	Brookie Judge
CBD-FORM-322	Bruce Fraley
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CBD-FORM-324	bruce pedersen
CBD-FORM-325	Bruce Randall
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CBD-FORM-327	Bryan Tarbox
CBD-FORM-	Bryan VanDuinen

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CBD-FORM-329	C C Churilla
CBD-FORM-330	C E Blower
CBD-FORM-331	C Trumann
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CBD-FORM-334	C. Cramer
CBD-FORM-335	C.A. Incze
CBD-FORM-336	Cailin Carlton
CBD-FORM-337	cal lash
CBD-FORM-338	Caleb Laieski
CBD-FORM-339	Cameron Barfield
CBD-FORM-340	Camile Kray
CBD-FORM-341	candace batten
CBD-FORM-342	Candace Godfrey
CBD-FORM-343	Candi Ausman
CBD-FORM-344	Candice Lowery

CBD-FORM-345	Candice Lynn
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CBD-FORM-347	Candiss Markowsky
CBD-FORM-348	candy rocha
CBD-FORM-349	Capri Starnes
CBD-FORM-350	Cara Gubrud
CBD-FORM-351	Caren Johnson
CBD-FORM-352	Carina Zevely
CBD-FORM-353	carl barton
CBD-FORM-354	Carla L
CBD-FORM-355	Carlene Delegal
CBD-FORM-356	Carlene Petty
CBD-FORM-357	Carlos Cabezud
CBD-FORM-358	Carlos Castro
CBD-FORM-359	Carlos Nunez
CBD-FORM-360	Carlos Oropeza
CBD-FORM-361	Carly Clements Owens
CBD-FORM-362	Carmen Bonilla-Jones
CBD-FORM-363	Carmen Druke
CBD-FORM-364	Carmen Ramirez Walker
CBD-FORM-365	Carmen Saenz-Harris
CBD-FORM-366	Carol Ann Sherratt
CBD-FORM-367	carol broll
CBD-FORM-368	Carol Collins
CBD-FORM-369	Carol Curtis
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CBD-FORM-373	Carol Hatfield
CBD-FORM-374	Carol J Erickson
CBD-FORM-375	Carol Jarvie
CBD-FORM-376	Carol Joan Patterson
CBD-FORM-377	Carol Lake
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CBD-FORM-380	Carol Mitchell
CBD-FORM-381	Carol Mortensen
CBD-FORM-382	Carol Patton
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CBD-FORM-385	Carol Rusk
CBD-FORM-386	Carol Simon
CBD-FORM-387	Carol Smith
CBD-FORM-388	Carol Steinhart
CBD-FORM-389	Carola Ebertz-Knop
CBD-FORM-390	Carole LaVigne
CBD-FORM-391	carole mark
CBD-FORM-392	Carole Mathews
CBD-FORM-393	Carole Plourde
CBD-FORM-	Carolyn Croom

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CBD-FORM-395	Carolyn Eden
CBD-FORM-396	Carolyn Friedman
CBD-FORM-397	Carolyn Moore
CBD-FORM-398	Carrie Daddow
CBD-FORM-399	Carrie Mack
CBD-FORM-400	Caryn Cowin
CBD-FORM-401	Caryn Graves
CBD-FORM-402	Cassie Holmgren
CBD-FORM-403	Cat Neshine
CBD-FORM-404	Catharine London
CBD-FORM-405	Catherine Berglund
CBD-FORM-406	Catherine Burns
CBD-FORM-407	Catherine Cerqua
CBD-FORM-408	Catherine Gauthier
CBD-FORM-409	catherine melvin
CBD-FORM-410	Catherine Williams

CBD-FORM-411	Cathleen Schmid
CBD-FORM-412	Cathryn Lee
CBD-FORM-413	Cathy Mathias
CBD-FORM-414	Cathy O'Leary Carey
CBD-FORM-415	Cathy Pyle
CBD-FORM-416	Cecelia Samp
CBD-FORM-417	Celeste Anacker
CBD-FORM-418	celeste chase
CBD-FORM-419	Celeste Wernz
CBD-FORM-420	chad mallett
CBD-FORM-421	Chad Zurko
CBD-FORM-422	Chantelle Loper
CBD-FORM-423	Charlene Boydston
CBD-FORM-424	Charlene Rush
CBD-FORM-425	charles & kathleen fitze
CBD-FORM-426	Charles Arnold
CBD-FORM-	Charles Calhoun

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CBD-FORM-428	Charles Lawson
CBD-FORM-429	Charles Muehlhof
CBD-FORM-430	Charles O'Keefe
CBD-FORM-431	Charles Schille, LICSW
CBD-FORM-432	Charley Wittman
CBD-FORM-433	Charlotte Sahnow
CBD-FORM-434	Charlotte Stahl
CBD-FORM-435	Charmanie White
CBD-FORM-436	Charmian larke
CBD-FORM-437	Charo Garcia
CBD-FORM-438	chas martin
CBD-FORM-439	Cheri Carlson
CBD-FORM-440	cheryl erb
CBD-FORM-441	Cheryl Fergeson
CBD-FORM-442	Cheryl Greenwald
CBD-FORM-443	Cheryl Pena

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CBD-FORM-445	Cheryl Vallone
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CBD-FORM-447	Chet Thomas
CBD-FORM-448	Chiara Rizzo
CBD-FORM-449	Chiara Testi
CBD-FORM-450	Chris Carlon
CBD-FORM-451	Chris Casper
CBD-FORM-452	Chris Ecker
CBD-FORM-453	Chris Faton
CBD-FORM-454	Chris Jones
CBD-FORM-455	chris koerner
CBD-FORM-456	Chris Munton
CBD-FORM-457	Christa Babst
CBD-FORM-458	Christa Ippoliti
CBD-FORM-459	Christelle REGIS
CBD-FORM-	Christi DeMark

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CBD-FORM-461	Christianna Skoczek
CBD-FORM-462	Christie Robnett
CBD-FORM-463	Christina Babst
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CBD-FORM-465	Christina Faulk
CBD-FORM-466	christina little
CBD-FORM-467	Christina Luberto
CBD-FORM-468	Christina Marcus
CBD-FORM-469	Christina Rainer
CBD-FORM-470	Christina Williams
CBD-FORM-471	Christine Cape
CBD-FORM-472	Christine Engel
CBD-FORM-473	christine krumm
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CBD-FORM-477	Christophe Ouedec
CBD-FORM-478	Christopher Hopkins
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CBD-FORM-481	Christopher Seymour
CBD-FORM-482	Christopher Walker
CBD-FORM-483	Christopher Warneke
CBD-FORM-484	Chuck Donegan
CBD-FORM-485	Chuck Graver
CBD-FORM-486	Chuck Wieland
CBD-FORM-487	Cigy Cyriac
CBD-FORM-488	Cindy Borske
CBD-FORM-489	Cindy McDaniel
CBD-FORM-490	Cindy Sims
CBD-FORM-491	Cindy Wargo
CBD-FORM-492	CJ Amoraal
CBD-FORM-	cj jensen

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CBD-FORM-494	cj shafer
CBD-FORM-495	Clair Sweeney
CBD-FORM-496	Claire Chambers
CBD-FORM-497	Claire Kugelman-Kropp
CBD-FORM-498	Claire Marie Stancek
CBD-FORM-499	Claire Mikalson
CBD-FORM-500	claire phillips
CBD-FORM-501	Claire Raffaelli
CBD-FORM-502	Claire Wolfe
CBD-FORM-503	claire zabel
CBD-FORM-504	Clare hooson
CBD-FORM-505	clare mcCollam-Lewis
CBD-FORM-506	Claude Robert
CBD-FORM-507	Claudia Heilke
CBD-FORM-508	Claudia Karll
CBD-FORM-509	claudia parker

CBD-FORM-510	Colin Flood
CBD-FORM-511	colin hebert
CBD-FORM-512	COLLEEN BURKE
CBD-FORM-513	COLLEEN BURKE
CBD-FORM-514	Colleen McMullen
CBD-FORM-515	Collin Hein
CBD-FORM-516	Colonel Meyer
CBD-FORM-517	Connie Chambers
CBD-FORM-518	Connie Curnow
CBD-FORM-519	Connie Delk
CBD-FORM-520	Connie Raper
CBD-FORM-521	connor hocking
CBD-FORM-522	Conor Brian Scott
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CBD-FORM-524	CONOR SORAGHAN
CBD-FORM-525	Constance A. Stinson
CBD-FORM-	Constance Morse

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CBD-FORM-527	Constance Pennington
CBD-FORM-528	Constantine Bogios
CBD-FORM-529	Coralie Benton
CBD-FORM-530	Corey Pane
CBD-FORM-531	Cori Bishop
CBD-FORM-532	Corie Benton
CBD-FORM-533	Corinne Chandless
CBD-FORM-534	Corinne Louise Greenberg
CBD-FORM-535	Cornelia Rueckert
CBD-FORM-536	cort323@yahoo.com
CBD-FORM-537	Courtney Laves-Mearini
CBD-FORM-538	courtney lewis
CBD-FORM-539	Craig Downer
CBD-FORM-540	Cristina Gatti
CBD-FORM-541	Cristina Río Lópezc
CBD-FORM-542	Cristina Sommaruga

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CBD-FORM-544	Crystal Conklin
CBD-FORM-545	Cy Neu
CBD-FORM-546	Cynthia Arnold
CBD-FORM-547	Cynthia Essig
CBD-FORM-548	Cynthia Nord
CBD-FORM-549	Cynthia Norris
CBD-FORM-550	Cynthia Ortiz
CBD-FORM-551	Cynthia Patterson
CBD-FORM-552	Cynthia Roberson
CBD-FORM-553	Cynthia Upp
CBD-FORM-554	D C Harris
CBD-FORM-555	d.a. roy
CBD-FORM-556	Daire Seaman
CBD-FORM-557	Dale Barclay
CBD-FORM-558	dale riehart
CBD-FORM-559	Dan Brook
CBD-FORM-560	Dan Esposito
CBD-FORM-561	Dan Matthews
CBD-FORM-562	Dan Meier
CBD-FORM-563	dan sandman
CBD-FORM-564	Dan Singer
CBD-FORM-565	Dan/Paula Fogarty
CBD-FORM-566	Dana Bleckinger
CBD-FORM-567	dana gurley
CBD-FORM-568	Daniel Arther
CBD-FORM-569	Daniel Belachew
CBD-FORM-570	daniel greider
CBD-FORM-571	Daniel Senic
CBD-FORM-572	Daniel Soulas
CBD-FORM-573	Daniel Tiarks
CBD-FORM-574	Daniel Wiese
CBD-FORM-575	danielle hyatt
CBD-FORM-576	Danielle Jenkins
CBD-FORM-577	Danna Williams
CBD-FORM-578	Dante Brintazzoli
CBD-FORM-579	Dara Gorelick
CBD-FORM-580	Darla Knutson
CBD-FORM-581	Darleen Hogg
CBD-FORM-582	darlene wolf
CBD-FORM-583	Darren Strain
CBD-FORM-584	Darrin Duling
CBD-FORM-585	darya alexandrovna
CBD-FORM-586	Dave & Sue Priest
CBD-FORM-587	Dave Adams
CBD-FORM-588	Dave Loiselle
CBD-FORM-589	Dave Wilson
CBD-FORM-590	David Bell
CBD-FORM-591	David Bigwood
CBD-FORM-	David Birnbaum

592	
CBD-FORM-593	David Bowman
CBD-FORM-594	David Boyer
CBD-FORM-595	David Brodnax
CBD-FORM-596	David Brunner
CBD-FORM-597	David Burkhart
CBD-FORM-598	David Camp
CBD-FORM-599	David Cayford
CBD-FORM-600	David Cosby
CBD-FORM-601	David Dunkleberger
CBD-FORM-602	David Dvorak Jr.
CBD-FORM-603	David Dyre
CBD-FORM-604	David Enevoldsen
CBD-FORM-605	David Gascon
CBD-FORM-606	David Hind
CBD-FORM-607	david j. lafond
CBD-FORM-608	David Moline

CBD-FORM-609	David Morais
CBD-FORM-610	David Parker
CBD-FORM-611	David Romportl
CBD-FORM-612	David Rosenberg
CBD-FORM-613	David Sanders
CBD-FORM-614	David Schmitt
CBD-FORM-615	David Sherman
CBD-FORM-616	David Snope
CBD-FORM-617	David Taylor
CBD-FORM-618	David Taylor
CBD-FORM-619	David Trask
CBD-FORM-620	David Walker
CBD-FORM-621	Davin Peterson
CBD-FORM-622	Davis Hawkowl
CBD-FORM-623	Dawn Kosec
CBD-FORM-624	Dawn Scott
CBD-FORM-	Dawn Stanko

625	
CBD-FORM-626	Day Denton
CBD-FORM-627	Dean Monroe
CBD-FORM-628	Dean Sherwood
CBD-FORM-629	Dean Webb
CBD-FORM-630	deana graff
CBD-FORM-631	Deanna Allen
CBD-FORM-632	Deanna Homer
CBD-FORM-633	Deb Fritzler
CBD-FORM-634	DEB Johnson
CBD-FORM-635	Deb Kobres
CBD-FORM-636	Deb Szymanski
CBD-FORM-637	Debbie Connery
CBD-FORM-638	Debbie Egan
CBD-FORM-639	Debbie Hood
CBD-FORM-640	Debbie McCarthy
CBD-FORM-641	Debbie Sirois

CBD-FORM-642	Debbie Spahn
CBD-FORM-643	Debbie Woods
CBD-FORM-644	Debby Montero
CBD-FORM-645	Deborah Ahlers
CBD-FORM-646	Deborah Barros
CBD-FORM-647	Deborah Deatherage
CBD-FORM-648	Deborah Fexis
CBD-FORM-649	Deborah Filipelli, Ph.D.
CBD-FORM-650	Deborah Hunter
CBD-FORM-651	Deborah Kearns
CBD-FORM-652	Deborah Klein
CBD-FORM-653	deborah lancman
CBD-FORM-654	Deborah Nudelman
CBD-FORM-655	Deborah Outman
CBD-FORM-656	Deborah Parker
CBD-FORM-657	deborah s Van Damme
CBD-FORM-658	Deborah Strohmayer
CBD-FORM-659	Debra Cunningham
CBD-FORM-660	Debra Dunson
CBD-FORM-661	Debra Hoven
CBD-FORM-662	Debra Makoff
CBD-FORM-663	Debra Mucci
CBD-FORM-664	Debra nichols
CBD-FORM-665	Debra Powell
CBD-FORM-666	Debra Saude
CBD-FORM-667	Dee Warenycia
CBD-FORM-668	Delbert Contival
CBD-FORM-669	Delia Volpi
CBD-FORM-670	Della Oliver
CBD-FORM-671	Della Pangborn
CBD-FORM-672	Delores Harshaw
CBD-FORM-673	Dena Garcia
CBD-FORM-674	Denee Scribner
CBD-FORM-675	Deneen Peckinpah
CBD-FORM-676	Denise Conte
CBD-FORM-677	Denise Dunlap
CBD-FORM-678	Denise Espinoza
CBD-FORM-679	Denise Morey
CBD-FORM-680	Denise Neuzil
CBD-FORM-681	Denise Rischel
CBD-FORM-682	Denise Romesburg
CBD-FORM-683	Dennis Hayden
CBD-FORM-684	Dennis Miller
CBD-FORM-685	Dennis Smith
CBD-FORM-686	Dennis Yee
CBD-FORM-687	Derek Andersen
CBD-FORM-688	Derek Stockdale
CBD-FORM-689	Derek Terran
CBD-FORM-690	Derek Young
CBD-FORM-	Desirée Ball

691	
CBD-FORM-692	Desiree Shaw
CBD-FORM-693	Detrea Moullet
CBD-FORM-694	Devin Henry
CBD-FORM-695	Dewey Fish
CBD-FORM-696	Dewey Odhner
CBD-FORM-697	Dhanjisha Variava
CBD-FORM-698	Dian Berger
CBD-FORM-699	dian wright
CBD-FORM-700	Diana Andres
CBD-FORM-701	Diana Franco
CBD-FORM-702	Diana Guzman
CBD-FORM-703	Diana Kaye
CBD-FORM-704	Diana Parmeter
CBD-FORM-705	Diana Schipperen
CBD-FORM-706	Diane Barham
CBD-FORM-707	Diane Berliner

CBD-FORM-708	Diane Neophytou
CBD-FORM-709	Diane Pacocha
CBD-FORM-710	Diane Paulson
CBD-FORM-711	Diane Reid
CBD-FORM-712	Diane Silverhawk
CBD-FORM-713	Diane Wynne
CBD-FORM-714	Dianna Poling Witucki
CBD-FORM-715	Dianne Ensign
CBD-FORM-716	dick Schoech
CBD-FORM-717	DIMITRIOS DOINAKIS
CBD-FORM-718	Dina Volpe
CBD-FORM-719	dinda evans
CBD-FORM-720	Dirk Beving
CBD-FORM-721	Dirk Obudzinski
CBD-FORM-722	Dirk Rogers
CBD-FORM-723	DL Caisse
CBD-FORM-	Dominick Falzone

724	
CBD-FORM-725	dominique lee
CBD-FORM-726	Don Barnhill
CBD-FORM-727	don crozier
CBD-FORM-728	Don Jacobson
CBD-FORM-729	Dona LaSchiava
CBD-FORM-730	Donald Brockway
CBD-FORM-731	Donald Figge
CBD-FORM-732	Donald Garlit
CBD-FORM-733	Donna Butler
CBD-FORM-734	Donna Clark
CBD-FORM-735	donna hughes
CBD-FORM-736	Donna Parente
CBD-FORM-737	Donna Parr
CBD-FORM-738	Donna Selquist
CBD-FORM-739	Donna Smith
CBD-FORM-740	Donna Watson

CBD-FORM-741	Donna Zappacosta
CBD-FORM-742	Donnette Lafleur
CBD-FORM-743	doris canaday
CBD-FORM-744	Doris Carey
CBD-FORM-745	Doris Lapierre
CBD-FORM-746	Doris Potter
CBD-FORM-747	Doris Vician
CBD-FORM-748	Dorothy Reichardt
CBD-FORM-749	Dorothy Wheeler
CBD-FORM-750	Doug Byron
CBD-FORM-751	Doug Dederich
CBD-FORM-752	Douglas Schleifer
CBD-FORM-753	Douglas Wingeier
CBD-FORM-754	Dr. Helen May
CBD-FORM-755	Drena LaPointe-Meyer
CBD-FORM-756	Duane Choy
CBD-FORM-757	DYLAN GUIDRY
CBD-FORM-758	e thomas
CBD-FORM-759	E. Perkins
CBD-FORM-760	eben futral
CBD-FORM-761	Ecology Center of Southern California
CBD-FORM-762	Eddie Floyd II
CBD-FORM-763	Eddie Konczal
CBD-FORM-764	Edith Borie
CBD-FORM-765	Edna Jamati
CBD-FORM-766	Edna Mullen
CBD-FORM-767	Edward Butler
CBD-FORM-768	Edward Craig
CBD-FORM-769	Edwin Aiken
CBD-FORM-770	edwin skinner
CBD-FORM-771	Edwina Smith
CBD-FORM-772	Edythe Cox
CBD-FORM-773	Eileen Conner
CBD-FORM-774	Eileen Daniels
CBD-FORM-775	Eileen Hampton
CBD-FORM-776	Eileen McCorry
CBD-FORM-777	Elaine Alfaro
CBD-FORM-778	Elaine and John Sartoris
CBD-FORM-779	Elaine Becker
CBD-FORM-780	Elaine Berg
CBD-FORM-781	Elaine Nations
CBD-FORM-782	Elaine Rizzo
CBD-FORM-783	Elaine Saldivar
CBD-FORM-784	Eleanor Liggio
CBD-FORM-785	Elena Moutier
CBD-FORM-786	Elena Myers
CBD-FORM-787	elena tsikala
CBD-FORM-788	Eleni Bousia
CBD-FORM-789	Eleni O'neill
CBD-FORM-	eliane leva

790	
CBD-FORM-791	Elisa Edgington
CBD-FORM-792	Elisabeth Collins
CBD-FORM-793	Elisabeth Penitschka
CBD-FORM-794	Elisabeth Richter
CBD-FORM-795	Elizabeth Brown
CBD-FORM-796	Elizabeth Butler
CBD-FORM-797	Elizabeth Cheong
CBD-FORM-798	Elizabeth Long
CBD-FORM-799	Elizabeth Tobier
CBD-FORM-800	Elizabeth Ungar
CBD-FORM-801	elizabeth watts
CBD-FORM-802	Elizabeth Wirtz
CBD-FORM-803	Ellaine Lurie-Janicki
CBD-FORM-804	Ellen Ayres
CBD-FORM-805	Ellen Beschler
CBD-FORM-806	Ellen Dollars

CBD-FORM-807	Ellen Frei
CBD-FORM-808	Ellen Gachesa
CBD-FORM-809	Ellen Goodman
CBD-FORM-810	Ellen McFarland
CBD-FORM-811	Ellen Siciliano
CBD-FORM-812	Ellen Zimmerman
CBD-FORM-813	ellen= dorfman
CBD-FORM-814	Elmo M. Davis
CBD-FORM-815	Eloy Santos
CBD-FORM-816	Elsa Ashelford
CBD-FORM-817	Elsie Hobbins
CBD-FORM-818	Emelia Breña Valle
CBD-FORM-819	emerald diamante
CBD-FORM-820	Emilia boccagna
CBD-FORM-821	Emilia Lausz
CBD-FORM-822	Emilio Andres Araya
CBD-FORM-	Emily Doutre

823	
CBD-FORM-824	Emily Kenny
CBD-FORM-825	Emily Lubahn
CBD-FORM-826	Emily Palmieri
CBD-FORM-827	Emily Smith
CBD-FORM-828	Emily Van Alyne
CBD-FORM-829	Emily Wronski
CBD-FORM-830	Emma Hartung
CBD-FORM-831	Emma Leyburn
CBD-FORM-832	Emma Spurgin Hussey
CBD-FORM-833	enzo mulas
CBD-FORM-834	Eric & Armin Karanjawala
CBD-FORM-835	Eric Edwards
CBD-FORM-836	Eric Fournier
CBD-FORM-837	Eric Hoyer
CBD-FORM-838	Eric Kaplan
CBD-FORM-839	Eric Lambart

CBD-FORM-840	Eric Morris
CBD-FORM-841	Eric Polczynski
CBD-FORM-842	Eric Simpson
CBD-FORM-843	Eric Simpson
CBD-FORM-844	Eric smith
CBD-FORM-845	Eric Stone
CBD-FORM-846	Eric West
CBD-FORM-847	Erica Montague
CBD-FORM-848	erich blengini
CBD-FORM-849	Ericka Camp
CBD-FORM-850	Erik Scott
CBD-FORM-851	Erin Barca
CBD-FORM-852	Erin Enger
CBD-FORM-853	erin reese
CBD-FORM-854	Erin Wallace
CBD-FORM-855	ern yarrobino
CBD-FORM-856	ERNEST SCHOLZ
CBD-FORM-857	Esmeralda Aldrich
CBD-FORM-858	Estefania Aparicio
CBD-FORM-859	Eva Cashdan
CBD-FORM-860	eva figueiredo
CBD-FORM-861	Eva Kristin Eriksen
CBD-FORM-862	Eva Pieroni
CBD-FORM-863	Eva Valencia
CBD-FORM-864	Evan Remash
CBD-FORM-865	Evan Roman
CBD-FORM-866	Evelyn E. Ledesma
CBD-FORM-867	Evelyn McMullen
CBD-FORM-868	Evelyn Verrill
CBD-FORM-869	Evinna Englezou
CBD-FORM-870	Ewa Piasecka
CBD-FORM-871	Fabio Corona
CBD-FORM-872	fairlee gamble
CBD-FORM-873	Faith Conroy
CBD-FORM-874	faith lewis
CBD-FORM-875	Faith Staggs
CBD-FORM-876	Falisha Finke
CBD-FORM-877	faon lewis
CBD-FORM-878	Felicia Tawil
CBD-FORM-879	Fenia Yfandi
CBD-FORM-880	Fernanda Muñoz
CBD-FORM-881	Fernando Cruz de Sousa
CBD-FORM-882	Filipa Lobão
CBD-FORM-883	Fletcher Chouinard
CBD-FORM-884	Fletcher Cossa
CBD-FORM-885	Florence Stanley
CBD-FORM-886	Foster Boone
CBD-FORM-887	Fran Reyes
CBD-FORM-888	Frances Callahan
CBD-FORM-	frances callahan

889	
CBD-FORM-890	Frances DeMillion
CBD-FORM-891	Frances Harriman
CBD-FORM-892	frances lightfine
CBD-FORM-893	Frances Patch
CBD-FORM-894	Frances Saykaly
CBD-FORM-895	Frances Tan
CBD-FORM-896	Francesca Mansfield
CBD-FORM-897	Francine Dolins
CBD-FORM-898	Francis & Patricia Gorman
CBD-FORM-899	Francisco Anta
CBD-FORM-900	Francois de la Giroday
CBD-FORM-901	Françoise Bonté
CBD-FORM-902	Frank Aaron
CBD-FORM-903	Frank Biermann
CBD-FORM-904	Frank Hill
CBD-FORM-905	Frank Seewester

CBD-FORM-906	Frank Tehan
CBD-FORM-907	Frank Watson
CBD-FORM-908	Franklin Eventoff
CBD-FORM-909	FRANKLIN KAPUSTKA
CBD-FORM-910	Fred Lavy
CBD-FORM-911	FRED Mayer
CBD-FORM-912	Fred Oliver
CBD-FORM-913	fred rinne
CBD-FORM-914	Frederick Horn
CBD-FORM-915	Frederick Ruch
CBD-FORM-916	Fulvia Marino
CBD-FORM-917	G. Preuss
CBD-FORM-918	Gabriel Sheets
CBD-FORM-919	Gabriel Sheridan
CBD-FORM-920	Gabriele Reinhart
CBD-FORM-921	Gabrielle Marshall
CBD-FORM-	Gail Adams

922	
CBD-FORM-923	Gail and Rick Konopacki
CBD-FORM-924	Gail Bedinger
CBD-FORM-925	Gail Cartwright
CBD-FORM-926	Gail Matwichuk
CBD-FORM-927	Gail Padalino
CBD-FORM-928	Gale Kelsey
CBD-FORM-929	Galen Davis
CBD-FORM-930	galina heuer
CBD-FORM-931	Gary Brooker
CBD-FORM-932	Gary Evans
CBD-FORM-933	Gary Hoyt
CBD-FORM-934	Gavin Bornholtz
CBD-FORM-935	Gayle B. Rosenberry
CBD-FORM-936	Gayle Sullivan
CBD-FORM-937	Gena Pennington
CBD-FORM-938	Gene Arias

CBD-FORM-939	gene groom
CBD-FORM-940	Gene Ulmer
CBD-FORM-941	Geoff Beasley
CBD-FORM-942	Geoff Bommelaere
CBD-FORM-943	Geoff Hirsch
CBD-FORM-944	Geoffrey Stearns
CBD-FORM-945	Georgann Meadows
CBD-FORM-946	George Latta
CBD-FORM-947	George P. Johnson
CBD-FORM-948	George Squires
CBD-FORM-949	Georgia Braithwaite
CBD-FORM-950	gerald rees
CBD-FORM-951	Geraldine Dickel
CBD-FORM-952	Geri Collecchia
CBD-FORM-953	Gerrit Crouse
CBD-FORM-954	Gerritt and Elizabeth Baker-Smith
CBD-FORM-955	Gerry Walsh
CBD-FORM-956	Ghazale Jamsheed
CBD-FORM-957	Gian Andrea Morresi
CBD-FORM-958	Gil Jenkins
CBD-FORM-959	Gina Gatto
CBD-FORM-960	Gina Palmisano
CBD-FORM-961	gina wiese
CBD-FORM-962	Ginger Carter
CBD-FORM-963	Ginger Mira
CBD-FORM-964	Ginger Young
CBD-FORM-965	Gioia Cristalli
CBD-FORM-966	giovanna gramignano
CBD-FORM-967	gitte santini
CBD-FORM-968	Glen Domulevicz
CBD-FORM-969	Glenn Smith
CBD-FORM-970	Gloria Ann Callahan
CBD-FORM-971	Gloria Cameron
CBD-FORM-972	Gloria D'Andrea
CBD-FORM-973	Gloria Diggle
CBD-FORM-974	Gloria Jones
CBD-FORM-975	Gloria Morrison
CBD-FORM-976	Gordon Grant
CBD-FORM-977	Grace Holden
CBD-FORM-978	GRACE NEFF
CBD-FORM-979	greg kareofelas
CBD-FORM-980	Greg Sweel
CBD-FORM-981	Greg Terhune
CBD-FORM-982	Gregory Esteve
CBD-FORM-983	Gregory Robertson
CBD-FORM-984	Gretchen Brewer
CBD-FORM-985	Gretchen Sudlow
CBD-FORM-986	Gunnar Sievert
CBD-FORM-987	Günther Spinnler
CBD-FORM-	Guy Bateman

988	
CBD-FORM-989	Guy Lusher
CBD-FORM-990	Guy Zahller
CBD-FORM-991	H. Chisholm
CBD-FORM-992	H. Nash
CBD-FORM-993	Hal Trufan
CBD-FORM-994	Hank Mirsky
CBD-FORM-995	Hanna Supeyeva
CBD-FORM-996	Hannah Beadman
CBD-FORM-997	Hannah Harte
CBD-FORM-998	Hannah Osborne
CBD-FORM-999	Harmony Conger
CBD-FORM-1000	Hartson Doak
CBD-FORM-1001	Heather Busse
CBD-FORM-1002	Heather Cross
CBD-FORM-1003	Heather Files
CBD-FORM-1004	Heather Halvorson

CBD-FORM-1005	Heather Holloway
CBD-FORM-1006	Heather John
CBD-FORM-1007	Heather Murawski
CBD-FORM-1008	Heather Petrovsky
CBD-FORM-1009	heidi arp
CBD-FORM-1010	Heidi Buitron
CBD-FORM-1011	heidi doman
CBD-FORM-1012	Heidi Hoffmann
CBD-FORM-1013	Heidi Letzmann
CBD-FORM-1014	Heidi Mayer
CBD-FORM-1015	Heidi Shuler
CBD-FORM-1016	Heidrun Kordholste-Nikander
CBD-FORM-1017	Helen Crabtree
CBD-FORM-1018	Henry Rauchweld
CBD-FORM-1019	Henry Rosenfeld
CBD-FORM-1020	Henry Van Zant
CBD-FORM-	Herman Osorio

1021	
CBD-FORM-1022	Hernry Berkowitz
CBD-FORM-1023	Hervé Bérard
CBD-FORM-1024	Hilary Aquino
CBD-FORM-1025	Holiday Houck
CBD-FORM-1026	Holly Yee
CBD-FORM-1027	HOMER PRICE
CBD-FORM-1028	Hope Gmyrek
CBD-FORM-1029	Hope Holtum
CBD-FORM-1030	Horst Pfand
CBD-FORM-1031	Houston Taylor
CBD-FORM-1032	Howard Cohen
CBD-FORM-1033	Howard Higson
CBD-FORM-1034	Hubert CANCE
CBD-FORM-1035	HUNTER WALLOF
CBD-FORM-1036	Ian Boyle
CBD-FORM-1037	Ian Gonzales

CBD-FORM-1038	Ian Rettie
CBD-FORM-1039	Ignazia Daidone
CBD-FORM-1040	Ilse Ziemann
CBD-FORM-1041	Imogen Taylor
CBD-FORM-1042	inga kaminski
CBD-FORM-1043	Internatural Alinement
CBD-FORM-1044	Irene Martinez
CBD-FORM-1045	Irene Tremper
CBD-FORM-1046	Iris Block
CBD-FORM-1047	Irving Shapiro
CBD-FORM-1048	Irwin Dunietz
CBD-FORM-1049	Isabel Araujo
CBD-FORM-1050	Isabella Abbiati
CBD-FORM-1051	isabelle boisgard
CBD-FORM-1052	Isobel Craig
CBD-FORM-1053	Isolina Callegari
CBD-FORM-1054	Ivailo Dunov
CBD-FORM-1055	Ivana Grmoja
CBD-FORM-1056	Ivana Rakic
CBD-FORM-1057	Ivana Sesar
CBD-FORM-1058	J Jackson
CBD-FORM-1059	J Noble
CBD-FORM-1060	J Roberts
CBD-FORM-1061	J Stufflebeam
CBD-FORM-1062	J Walby
CBD-FORM-1063	J. Holley Taylor
CBD-FORM-1064	J. K. Fort
CBD-FORM-1065	J. Siska Hjelmgren
CBD-FORM-1066	Jacinda Fenske
CBD-FORM-1067	Jack Barber
CBD-FORM-1068	Jack Runnels
CBD-FORM-1069	Jackie Pomies
CBD-FORM-1070	Jacqueline Baruch
CBD-FORM-1071	Jacqueline Peipert
CBD-FORM-1072	Jacques korte leccia
CBD-FORM-1073	Jamee Warfle
CBD-FORM-1074	James & Shelley & Elise Poston
CBD-FORM-1075	james a hughes
CBD-FORM-1076	James Barnes
CBD-FORM-1077	james button >
CBD-FORM-1078	James Columbia
CBD-FORM-1079	JAMES CONROY
CBD-FORM-1080	James Davies
CBD-FORM-1081	James Fishgold
CBD-FORM-1082	James Grimes
CBD-FORM-1083	James H. Fitch
CBD-FORM-1084	James James
CBD-FORM-1085	James Klein
CBD-FORM-1086	James Kunz
CBD-FORM-	James Manning

1087	
CBD-FORM-1088	James Moran
CBD-FORM-1089	James Mulcare
CBD-FORM-1090	James Plagmann
CBD-FORM-1091	James Robertson
CBD-FORM-1092	James Sullivan
CBD-FORM-1093	james thompson
CBD-FORM-1094	James Wilcox
CBD-FORM-1095	James Woods
CBD-FORM-1096	jamie harrison
CBD-FORM-1097	Jamie Rasmussen
CBD-FORM-1098	Jamie Rosenblood
CBD-FORM-1099	Jamila Garrecht
CBD-FORM-1100	Jan Cool
CBD-FORM-1101	Jane Daniels
CBD-FORM-1102	Jane Drews
CBD-FORM-1103	jane griffiths

CBD-FORM-1104	Jane LeGrow
CBD-FORM-1105	Jane Reynolds
CBD-FORM-1106	Jane So,[spm
CBD-FORM-1107	Janet Barber
CBD-FORM-1108	Janet Cameron
CBD-FORM-1109	Janet Cavallo
CBD-FORM-1110	janet curtis
CBD-FORM-1111	Janet Delaney
CBD-FORM-1112	Janet Duran
CBD-FORM-1113	Janet Fotos
CBD-FORM-1114	janet hACKNEY
CBD-FORM-1115	Janet klecker
CBD-FORM-1116	janet letusick-spear
CBD-FORM-1117	Janet Robbins
CBD-FORM-1118	Janet Smith
CBD-FORM-1119	Janet Standridge
CBD-FORM-	Janice Paik

1120	
CBD-FORM-1121	Janice Rogers
CBD-FORM-1122	janna piper
CBD-FORM-1123	Janna Wiedemann
CBD-FORM-1124	Jannette Ferguson
CBD-FORM-1125	Jaquelyn Chagnon
CBD-FORM-1126	Jared Cornelia
CBD-FORM-1127	Jared Laiti
CBD-FORM-1128	Jared Peace
CBD-FORM-1129	Jason Agnew
CBD-FORM-1130	Jason Chisholm
CBD-FORM-1131	Jason Cooperrider
CBD-FORM-1132	jason lambert
CBD-FORM-1133	jason palmer
CBD-FORM-1134	Jason Perry
CBD-FORM-1135	Jason Walker
CBD-FORM-1136	Jayleen Hatmaker

CBD-FORM-1137	Jean Naples
CBD-FORM-1138	jean schwartz
CBD-FORM-1139	Jean Woodman
CBD-FORM-1140	jeanette donato
CBD-FORM-1141	Jean-François Dutto
CBD-FORM-1142	Jeanine Wilder
CBD-FORM-1143	Jeanine Zinno
CBD-FORM-1144	Jeanne Dutto
CBD-FORM-1145	Jeanne Greene
CBD-FORM-1146	jeanne hayes
CBD-FORM-1147	Jeanne Hevener
CBD-FORM-1148	Jeannie Gibbons
CBD-FORM-1149	Jeannie Tyner
CBD-FORM-1150	Jeannine Mendrola
CBD-FORM-1151	Jeene Mance
CBD-FORM-1152	Jeff Hanus
CBD-FORM-1153	Jeff Hoffman
CBD-FORM-1154	jeff hopkins
CBD-FORM-1155	Jeff Komisarof
CBD-FORM-1156	Jeff Payne
CBD-FORM-1157	Jeff Thayer
CBD-FORM-1158	Jeffrey Howe
CBD-FORM-1159	Jeffrey Hurwitz
CBD-FORM-1160	Jelica Roland
CBD-FORM-1161	Jenette Champagne
CBD-FORM-1162	Jenn Kirkendall
CBD-FORM-1163	Jennifer Cartwright
CBD-FORM-1164	jennifer ciambrone
CBD-FORM-1165	Jennifer Cochran
CBD-FORM-1166	Jennifer Delker
CBD-FORM-1167	Jennifer Dziedzic
CBD-FORM-1168	Jennifer Everett
CBD-FORM-1169	Jennifer Flood
CBD-FORM-1170	Jennifer Harrison
CBD-FORM-1171	jennifer henderson
CBD-FORM-1172	Jennifer Jayroe
CBD-FORM-1173	Jennifer Johnson
CBD-FORM-1174	jennifer kilgore
CBD-FORM-1175	Jennifer M Weishaar
CBD-FORM-1176	Jennifer Mathers
CBD-FORM-1177	Jennifer Milam
CBD-FORM-1178	Jennifer Miller
CBD-FORM-1179	Jennifer Nitz
CBD-FORM-1180	Jennifer Norman
CBD-FORM-1181	Jennifer Oppenheim
CBD-FORM-1182	Jennifer Place
CBD-FORM-1183	Jennifer Rials
CBD-FORM-1184	Jennifer Sawyer
CBD-FORM-1185	Jennifer Smith
CBD-FORM-	jennifer st.mary-ledbetter

1186	
CBD-FORM-1187	Jennifer Stamps
CBD-FORM-1188	Jennifer Suzanne Martino
CBD-FORM-1189	Jennifer Taylor
CBD-FORM-1190	Jennifer Willett
CBD-FORM-1191	Jenny Boulton
CBD-FORM-1192	Jenny O'Neil
CBD-FORM-1193	Jenny Ruckdeschel
CBD-FORM-1194	Jere Bowden
CBD-FORM-1195	Jeremiah Podleski
CBD-FORM-1196	Jeremy Chrupka
CBD-FORM-1197	Jeremy Nathan Marks
CBD-FORM-1198	Jeri Rossi
CBD-FORM-1199	jeriP pollock
CBD-FORM-1200	Jerry Bonanno
CBD-FORM-1201	Jerry Golden
CBD-FORM-1202	Jerry Peavy

CBD-FORM-1203	jerry spetsieris
CBD-FORM-1204	Jesse Miller
CBD-FORM-1205	Jesse Williams
CBD-FORM-1206	Jessica Arnold
CBD-FORM-1207	jessica barley
CBD-FORM-1208	Jessica Cox
CBD-FORM-1209	jessica gunnells
CBD-FORM-1210	Jessica Kraskian
CBD-FORM-1211	Jessica Macomber
CBD-FORM-1212	Jessica Ramirez
CBD-FORM-1213	Jessica Rocheleau
CBD-FORM-1214	jessica sargent
CBD-FORM-1215	Jessica Tellez
CBD-FORM-1216	Jessie Edwards
CBD-FORM-1217	Jessie Osborne
CBD-FORM-1218	Jessika Kiel
CBD-FORM-	Jie Wei Tan

1219	
CBD-FORM-1220	Jill Brothers
CBD-FORM-1221	Jill Gleeson
CBD-FORM-1222	jill nord
CBD-FORM-1223	Jill Tierney
CBD-FORM-1224	Jim and Virginia Wagner
CBD-FORM-1225	JIM HEAD
CBD-FORM-1226	Jim Rettig
CBD-FORM-1227	Jim Thomas
CBD-FORM-1228	Jim Yarbrough
CBD-FORM-1229	Jimmie Wolfe
CBD-FORM-1230	Jimmy Pearson
CBD-FORM-1231	JK Kibler
CBD-FORM-1232	jo wiest
CBD-FORM-1233	joan ciccarone
CBD-FORM-1234	Joan Denman
CBD-FORM-1235	Joan DeVagno

CBD-FORM-1236	joan milford
CBD-FORM-1237	joan scott
CBD-FORM-1238	Joan Walker
CBD-FORM-1239	Joan Ward
CBD-FORM-1240	Joan Weaver
CBD-FORM-1241	Joan Zawaski
CBD-FORM-1242	Joann Maier
CBD-FORM-1243	jOANN Ramos
CBD-FORM-1244	Joanna Bonnheim
CBD-FORM-1245	Joanna Welch
CBD-FORM-1246	Joanne Burke
CBD-FORM-1247	Joanne Calash
CBD-FORM-1248	Joanne Cockerill
CBD-FORM-1249	Joanne Colson
CBD-FORM-1250	joanne reisch
CBD-FORM-1251	Jodeen J
CBD-FORM-1252	Jodi Roberts
CBD-FORM-1253	Jodie Schossow
CBD-FORM-1254	Jody Gibson
CBD-FORM-1255	Joe Calabrese
CBD-FORM-1256	Joe Futterer
CBD-FORM-1257	Joe Krein
CBD-FORM-1258	Joe Phillips
CBD-FORM-1259	Joe Shabaduh
CBD-FORM-1260	Joel Page
CBD-FORM-1261	Joel Page
CBD-FORM-1262	Joel Trupin
CBD-FORM-1263	johanna isaacs
CBD-FORM-1264	Johannes Siebke
CBD-FORM-1265	John Albertini
CBD-FORM-1266	John Blalock
CBD-FORM-1267	john brinkman
CBD-FORM-1268	John Davis
CBD-FORM-1269	John DonaldsonII
CBD-FORM-1270	John Dulik
CBD-FORM-1271	John Edman
CBD-FORM-1272	John Essman
CBD-FORM-1273	John Estes
CBD-FORM-1274	John Farver
CBD-FORM-1275	John Feissel
CBD-FORM-1276	John Harris
CBD-FORM-1277	John Heyneman
CBD-FORM-1278	John Jenkins
CBD-FORM-1279	john kegler
CBD-FORM-1280	John Kesich
CBD-FORM-1281	John L. Keiser
CBD-FORM-1282	John Lemmon
CBD-FORM-1283	John Lewis
CBD-FORM-1284	JOHN MARSHALL
CBD-FORM-	John Mullan

1285	
CBD-FORM-1286	John Nettleton
CBD-FORM-1287	John Orsini
CBD-FORM-1288	john pasqua
CBD-FORM-1289	John Pritchard
CBD-FORM-1290	John Pye
CBD-FORM-1291	John R Jackson
CBD-FORM-1292	John Rokas
CBD-FORM-1293	John Schumacher
CBD-FORM-1294	John Shannon
CBD-FORM-1295	John Shiffler
CBD-FORM-1296	John Spitale
CBD-FORM-1297	John Varga
CBD-FORM-1298	John Wolfe
CBD-FORM-1299	Joline Gitis
CBD-FORM-1300	Jon Zielinski
CBD-FORM-1301	Jonathan Eden

CBD-FORM-1302	Jonathan Kaufman Scher
CBD-FORM-1303	Jonathan Nash
CBD-FORM-1304	Jonathan Wieder
CBD-FORM-1305	Jordan Pakaki
CBD-FORM-1306	Jordan Yeatts
CBD-FORM-1307	Jordana H.
CBD-FORM-1308	Jorge De Cecco
CBD-FORM-1309	Jori Davison
CBD-FORM-1310	Josefina Vidal
CBD-FORM-1311	Joseph A. Mungai
CBD-FORM-1312	Joseph Alfano
CBD-FORM-1313	Joseph Kress
CBD-FORM-1314	Joseph Phillips
CBD-FORM-1315	Josephine Niemann
CBD-FORM-1316	josh kaye-carr
CBD-FORM-1317	Josh Kaye-Carr
CBD-FORM-	Joshua Hart

1318	
CBD-FORM-1319	Joshua Mahurin
CBD-FORM-1320	Joshua Maizel
CBD-FORM-1321	Joy Loyd
CBD-FORM-1322	Joy Murphy
CBD-FORM-1323	Joy Puder
CBD-FORM-1324	Joyce and Bill Bryson
CBD-FORM-1325	Joyce Coombs
CBD-FORM-1326	Joyce Frohn
CBD-FORM-1327	Joyce Grajczyk
CBD-FORM-1328	joyce schwartz
CBD-FORM-1329	Joyce Terwilliger
CBD-FORM-1330	JR Summers
CBD-FORM-1331	JT Adams
CBD-FORM-1332	Juan Murcia
CBD-FORM-1333	Juanita Montano
CBD-FORM-1334	Judith Fruge

CBD-FORM-1335	Judith Gordon
CBD-FORM-1336	Judith Mitchell
CBD-FORM-1337	Judith Pelletier
CBD-FORM-1338	Judith Swain
CBD-FORM-1339	Judy Boone
CBD-FORM-1340	Judy Boone
CBD-FORM-1341	Judy Cato
CBD-FORM-1342	Judy de Groot
CBD-FORM-1343	Judy ericson
CBD-FORM-1344	Judy Kahkonen
CBD-FORM-1345	Judy Landress
CBD-FORM-1346	Judy Shively
CBD-FORM-1347	Judy W. Soffler
CBD-FORM-1348	Julia Brandner
CBD-FORM-1349	julia Broome
CBD-FORM-1350	Julia Burwell
CBD-FORM-1351	Julia Griparic
CBD-FORM-1352	Julia Thompson
CBD-FORM-1353	juliana MARQUES
CBD-FORM-1354	Julianna Riley
CBD-FORM-1355	Julianne Ramaker
CBD-FORM-1356	Julie Amato
CBD-FORM-1357	Julie Anderson
CBD-FORM-1358	Julie Beer
CBD-FORM-1359	Julie Brickell
CBD-FORM-1360	Julie du Bois
CBD-FORM-1361	Julie Figueroa
CBD-FORM-1362	Julie Ford
CBD-FORM-1363	Julie Leavenworth
CBD-FORM-1364	Julie Lewey
CBD-FORM-1365	julie rodgers
CBD-FORM-1366	Julie Smith
CBD-FORM-1367	Julie Talcott-Fuller
CBD-FORM-1368	Julie Wilson
CBD-FORM-1369	julien Massol
CBD-FORM-1370	Juliet Stratton
CBD-FORM-1371	Julija Merljak
CBD-FORM-1372	June Attarian
CBD-FORM-1373	June Maselli
CBD-FORM-1374	Justine Jackson-Ricketts
CBD-FORM-1375	k danowski
CBD-FORM-1376	k hipkins
CBD-FORM-1377	K Riggs
CBD-FORM-1378	k thomas
CBD-FORM-1379	K. Burns
CBD-FORM-1380	KA Castle
CBD-FORM-1381	Kaila Estrada
CBD-FORM-1382	kale haggard
CBD-FORM-1383	Kamila Szuberla
CBD-FORM-	karab hughes

1384	
CBD-FORM-1385	Kareem Talhouni
CBD-FORM-1386	Karen Bartell
CBD-FORM-1387	karen brant
CBD-FORM-1388	Karen Given
CBD-FORM-1389	Karen Graham
CBD-FORM-1390	Karen H. Loughmiller
CBD-FORM-1391	Karen Kravcov Malcolm
CBD-FORM-1392	karen linarez
CBD-FORM-1393	Karen Luce
CBD-FORM-1394	Karen Mosser
CBD-FORM-1395	Karen Romano
CBD-FORM-1396	Karen Stevens
CBD-FORM-1397	Karen Tucker
CBD-FORM-1398	Karen Vasily
CBD-FORM-1399	karen wible
CBD-FORM-1400	Kari Wouk

CBD-FORM-1401	Karin Lundkvist
CBD-FORM-1402	Karina Soerensen
CBD-FORM-1403	Karine Ferreira Strazisar
CBD-FORM-1404	Karl Hunting
CBD-FORM-1405	Karyn Gil
CBD-FORM-1406	Karyn Sederberg
CBD-FORM-1407	Karyon Owen
CBD-FORM-1408	Kasia Richer-Juraszek
CBD-FORM-1409	Kassandra Levay
CBD-FORM-1410	Kat Raisky
CBD-FORM-1411	Katarzyna Kubzdela
CBD-FORM-1412	Kate Jamal
CBD-FORM-1413	Kate Robinson
CBD-FORM-1414	Kate Wenzell
CBD-FORM-1415	katerina alexandrovna
CBD-FORM-1416	Katharine Retherford
CBD-FORM-	Kathe Garbrick

1417	
CBD-FORM-1418	Katherine Bommarito
CBD-FORM-1419	Katherine Mouzourakis
CBD-FORM-1420	Katherine Nelson
CBD-FORM-1421	Katherine Roberts
CBD-FORM-1422	Katherine Whitson
CBD-FORM-1423	Kathleen Clark
CBD-FORM-1424	Kathleen Curl
CBD-FORM-1425	Kathleen Eaton
CBD-FORM-1426	Kathleen Kiselewich
CBD-FORM-1427	Kathleen Kliese
CBD-FORM-1428	Kathleen Mohning
CBD-FORM-1429	Kathleen Morris
CBD-FORM-1430	Kathleen Resnick
CBD-FORM-1431	Kathleen Templeton
CBD-FORM-1432	Kathleen View
CBD-FORM-1433	kathleen wissenz

CBD-FORM-1434	Kathryn Cagle
CBD-FORM-1435	Kathryn Droubi
CBD-FORM-1436	kathryn klecan
CBD-FORM-1437	Kathryn Lemoine
CBD-FORM-1438	Kathryn McDermott
CBD-FORM-1439	Kathryn Morgan
CBD-FORM-1440	Kathryn Parke
CBD-FORM-1441	Kathryn Richardson
CBD-FORM-1442	Kathryn Rose
CBD-FORM-1443	Kathryn Vestal
CBD-FORM-1444	Kathy Bentley
CBD-FORM-1445	Kathy Britt
CBD-FORM-1446	Kathy Galligan
CBD-FORM-1447	Kathy Hanson
CBD-FORM-1448	Kathy LoPresti
CBD-FORM-1449	Kathy Popoff
CBD-FORM-1450	Kathy Silvey
CBD-FORM-1451	kathy watts
CBD-FORM-1452	Katie Kaiser
CBD-FORM-1453	Katie Sirk
CBD-FORM-1454	Katie Whittaker
CBD-FORM-1455	Katrien Vandevelde
CBD-FORM-1456	Kay Westby
CBD-FORM-1457	Kayla Ev
CBD-FORM-1458	Kayleen Gubrud
CBD-FORM-1459	Keely Jared
CBD-FORM-1460	Keely Parr
CBD-FORM-1461	Keeta Beaubien
CBD-FORM-1462	Keiko Ishida
CBD-FORM-1463	Keiko Martinez
CBD-FORM-1464	Keith Hiestand
CBD-FORM-1465	Keith Teeter
CBD-FORM-1466	Kelli Baker
CBD-FORM-1467	Kelly Jacobson
CBD-FORM-1468	Kelly Levans
CBD-FORM-1469	Kelly Lombardi
CBD-FORM-1470	Kelly Popp
CBD-FORM-1471	Kelly Riley
CBD-FORM-1472	Kelsey Parkins
CBD-FORM-1473	Ken Green
CBD-FORM-1474	ken gunther
CBD-FORM-1475	Ken Hedges
CBD-FORM-1476	Ken Johnston
CBD-FORM-1477	KEN MOORE
CBD-FORM-1478	Ken Strothkamp
CBD-FORM-1479	Ken Ward Jr.
CBD-FORM-1480	Ken Wong
CBD-FORM-1481	Kenna Fowler
CBD-FORM-1482	Kenneth Barnes
CBD-FORM-	Kenneth Douglas

1483	
CBD-FORM-1484	Kenneth Gibson
CBD-FORM-1485	Kenneth Kolanko
CBD-FORM-1486	Kenneth Kron
CBD-FORM-1487	Kenneth Tabachnick
CBD-FORM-1488	Kermit Cuff
CBD-FORM-1489	kerry burkhardt
CBD-FORM-1490	Kerry Campbell
CBD-FORM-1491	Kerry Dorsey
CBD-FORM-1492	kerry Kittrell
CBD-FORM-1493	Kessley Truman
CBD-FORM-1494	Kevin Gallagher
CBD-FORM-1495	Kevin Reel
CBD-FORM-1496	Kevin Ryan
CBD-FORM-1497	Khalil Kinge
CBD-FORM-1498	kim bauer
CBD-FORM-1499	kim cameron

CBD-FORM-1500	kim english
CBD-FORM-1501	kim groom
CBD-FORM-1502	Kim Johnson
CBD-FORM-1503	Kim McCoy
CBD-FORM-1504	Kim Moreno
CBD-FORM-1505	Kim Mott
CBD-FORM-1506	Kim O'Bryan
CBD-FORM-1507	Kim Pham
CBD-FORM-1508	Kim Sandholdt
CBD-FORM-1509	Kim Stern
CBD-FORM-1510	kim winter
CBD-FORM-1511	Kimberley Buckley
CBD-FORM-1512	Kimberly Locke
CBD-FORM-1513	Kimberly Ray
CBD-FORM-1514	Kimberly Simms
CBD-FORM-1515	kimberly skrobiza
CBD-FORM-	Kimberly Tilley

1516	
CBD-FORM-1517	Kimberly Wiley
CBD-FORM-1518	Kimberly Wyke
CBD-FORM-1519	Kinney Evitt
CBD-FORM-1520	kip marlow
CBD-FORM-1521	Kirk Rhoads
CBD-FORM-1522	KJ Herson
CBD-FORM-1523	Kreen L
CBD-FORM-1524	Krissy Hughes
CBD-FORM-1525	Kristen Allbritton
CBD-FORM-1526	Kristen Bossard
CBD-FORM-1527	Kristen Magno
CBD-FORM-1528	Kristi Hendrickson
CBD-FORM-1529	Kristi Hutchison
CBD-FORM-1530	Kristian Glover
CBD-FORM-1531	Kristiana Dahl
CBD-FORM-1532	Kristin Anne Conrad-Antoville

CBD-FORM-1533	kristin erbach
CBD-FORM-1534	Kristin Williams
CBD-FORM-1535	Kristin Womack
CBD-FORM-1536	Kristina Fukuda-Schmid
CBD-FORM-1537	Kristina Gravette
CBD-FORM-1538	Kurt Emmanuele
CBD-FORM-1539	Kurt Fratzke
CBD-FORM-1540	Kyle Buss
CBD-FORM-1541	Kyle Calcagno
CBD-FORM-1542	Kylie Cullen
CBD-FORM-1543	L Bxx
CBD-FORM-1544	L cummings
CBD-FORM-1545	L G
CBD-FORM-1546	l Irwin
CBD-FORM-1547	l TOMKO
CBD-FORM-1548	L. D. Pratt
CBD-FORM-1549	L. Kruger
CBD-FORM-1550	L. Peterson
CBD-FORM-1551	L.S. Wanner
CBD-FORM-1552	Lacey Levitt
CBD-FORM-1553	Laci Branch
CBD-FORM-1554	Laina Shockley
CBD-FORM-1555	Laken Pugsley
CBD-FORM-1556	Lara Michele
CBD-FORM-1557	LARISSA RODRIGUEZ
CBD-FORM-1558	Larry Wood
CBD-FORM-1559	launa prince
CBD-FORM-1560	Laura Baldwin
CBD-FORM-1561	Laura Bernsstein
CBD-FORM-1562	laura cosentino
CBD-FORM-1563	Laura De Maria
CBD-FORM-1564	Laura Dicus
CBD-FORM-1565	Laura Feld
CBD-FORM-1566	Laura Gleason
CBD-FORM-1567	laura hedlund
CBD-FORM-1568	Laura Herndon
CBD-FORM-1569	Laura Lieberman
CBD-FORM-1570	Laura Napoleon
CBD-FORM-1571	laura semboli
CBD-FORM-1572	laura Shepard
CBD-FORM-1573	Laura Sholtz
CBD-FORM-1574	Laura Ziegler
CBD-FORM-1575	Laurel Cohen
CBD-FORM-1576	Laurel E. Tate
CBD-FORM-1577	lauren basalla
CBD-FORM-1578	Lauren Kramer
CBD-FORM-1579	Lauren Murdock
CBD-FORM-1580	Lauren Ranz
CBD-FORM-1581	lauren smith
CBD-FORM-	Lauren Yarrish

1582	
CBD-FORM-1583	Laurie Carr
CBD-FORM-1584	Laurie Hein
CBD-FORM-1585	Laurie Lindemulder-Harris
CBD-FORM-1586	laurie sudol
CBD-FORM-1587	Lawrence Carbary
CBD-FORM-1588	Lawrence Magliola
CBD-FORM-1589	Lawrence McTigue
CBD-FORM-1590	Lawrence Thompson
CBD-FORM-1591	Lawrence Turk
CBD-FORM-1592	Leah Ray
CBD-FORM-1593	Leah Stavish
CBD-FORM-1594	Leah Travaline
CBD-FORM-1595	Leanne Civiletti
CBD-FORM-1596	Leanne Vines
CBD-FORM-1597	Lee and Charlotte Terbot
CBD-FORM-1598	Lee Baron

CBD-FORM-1599	Lee Winslow
CBD-FORM-1600	Leeann French
CBD-FORM-1601	Leigh Begalske
CBD-FORM-1602	Leila Gill
CBD-FORM-1603	Leo Ashton
CBD-FORM-1604	leon clingman
CBD-FORM-1605	Leon Muhudinov
CBD-FORM-1606	Leonard Bruckman
CBD-FORM-1607	Leonard Marcus
CBD-FORM-1608	Leonardo Benucci
CBD-FORM-1609	Lesa Pond
CBD-FORM-1610	Lesia Mills
CBD-FORM-1611	leslie bald
CBD-FORM-1612	Leslie Billings
CBD-FORM-1613	Leslie Cummings
CBD-FORM-1614	Leslie Gaye Price
CBD-FORM-	Leslie MacKay

1615	
CBD-FORM-1616	Leslie Powell
CBD-FORM-1617	leslie schriener
CBD-FORM-1618	Leslie Tawnamaia
CBD-FORM-1619	Leslie Wingerath
CBD-FORM-1620	Lesly Vick
CBD-FORM-1621	Leticia Bayona
CBD-FORM-1622	Lhasa Compton
CBD-FORM-1623	Liam Gray
CBD-FORM-1624	Libby Haycock
CBD-FORM-1625	LILLY LETUSICK
CBD-FORM-1626	Lily Maisky
CBD-FORM-1627	lily mast
CBD-FORM-1628	Lina Easom
CBD-FORM-1629	Linda Bruner
CBD-FORM-1630	Linda Cabanban
CBD-FORM-1631	Linda Downer

CBD-FORM-1632	Linda Fair
CBD-FORM-1633	Linda Falcone
CBD-FORM-1634	Linda Gall
CBD-FORM-1635	Linda Gazzola
CBD-FORM-1636	Linda Luke
CBD-FORM-1637	Linda McVarish
CBD-FORM-1638	LINDA NORRIS
CBD-FORM-1639	Linda Schermer
CBD-FORM-1640	Linda Sessine
CBD-FORM-1641	Lindsay Holeman
CBD-FORM-1642	Lindsay Johnson
CBD-FORM-1643	Lindsay Ramos
CBD-FORM-1644	Lindsay Rayner
CBD-FORM-1645	Lisa Dadgar
CBD-FORM-1646	Lisa Douglass
CBD-FORM-1647	lisa gilling
CBD-FORM-1648	Lisa Gosnell
CBD-FORM-1649	Lisa Jablow
CBD-FORM-1650	Lisa Jacobson
CBD-FORM-1651	Lisa Leutheuser
CBD-FORM-1652	Lisa Long
CBD-FORM-1653	Lisa Matejka
CBD-FORM-1654	lisa norman
CBD-FORM-1655	Lisa Piner
CBD-FORM-1656	Lisa Provident
CBD-FORM-1657	Lisa Rae
CBD-FORM-1658	Lisa Reeves
CBD-FORM-1659	Lisa Rubin
CBD-FORM-1660	lisa salazar
CBD-FORM-1661	Lisa Sood
CBD-FORM-1662	Lisa Stone
CBD-FORM-1663	Lisa Vana
CBD-FORM-1664	Lisa Williamson
CBD-FORM-1665	Lisa Zarafonetis
CBD-FORM-1666	Lisette Fabian
CBD-FORM-1667	Liz Kessler
CBD-FORM-1668	Liz Sigel
CBD-FORM-1669	Lloyd Hebert
CBD-FORM-1670	Lois Clymer
CBD-FORM-1671	Lois Kendall
CBD-FORM-1672	Lois Yuen
CBD-FORM-1673	lonna richmond
CBD-FORM-1674	Loraine Puryear
CBD-FORM-1675	Loralee Clark
CBD-FORM-1676	Lorali Wyant
CBD-FORM-1677	Loretta Marmor
CBD-FORM-1678	Lori Albee
CBD-FORM-1679	Lori Kegler
CBD-FORM-1680	Lori Sherry
CBD-FORM-	Lori Triggs

1681	
CBD-FORM-1682	Lorne Beatty
CBD-FORM-1683	Lorraine Millard
CBD-FORM-1684	lorraine petro
CBD-FORM-1685	Louis Bubala
CBD-FORM-1686	Louis Pontillo
CBD-FORM-1687	Louis Reginato Jr
CBD-FORM-1688	Louise J Bowles
CBD-FORM-1689	Louise Slattery
CBD-FORM-1690	Lowell Eliason
CBD-FORM-1691	luana costanzini
CBD-FORM-1692	Luanne Alomair
CBD-FORM-1693	Luanne Serrato
CBD-FORM-1694	Lucette Lahaye
CBD-FORM-1695	Luci Ungar
CBD-FORM-1696	Luci Ungar, Artist
CBD-FORM-1697	Lucille Trujillo

CBD-FORM-1698	LUCINDA BRISBANE
CBD-FORM-1699	Lucy Gray
CBD-FORM-1700	Lucy Hadl
CBD-FORM-1701	Lucy Starbuck
CBD-FORM-1702	Luke Keller
CBD-FORM-1703	Lura Irish
CBD-FORM-1704	Lydia Rogers
CBD-FORM-1705	Lydia Skloven
CBD-FORM-1706	Lyn Berling
CBD-FORM-1707	Lynn Barnes
CBD-FORM-1708	Lynn Ledgerwood
CBD-FORM-1709	Lynn Locke
CBD-FORM-1710	Lynn Lytton
CBD-FORM-1711	Lynn Markert
CBD-FORM-1712	Lynn Minneman
CBD-FORM-1713	Lynn Pitney
CBD-FORM-	Lynn Powers

1714	
CBD-FORM-1715	Lynn Sajdak
CBD-FORM-1716	Lynn Sovell
CBD-FORM-1717	Lynn Wiliiamson
CBD-FORM-1718	Lynnda Strong
CBD-FORM-1719	Lynne Banta
CBD-FORM-1720	Lynnette Lane
CBD-FORM-1721	M Epton
CBD-FORM-1722	m rossi
CBD-FORM-1723	M Starr
CBD-FORM-1724	M. Alice DeAngelis
CBD-FORM-1725	m. canter
CBD-FORM-1726	M. Renee Taylor
CBD-FORM-1727	M. RIVERA
CBD-FORM-1728	MA Kruse
CBD-FORM-1729	Madeleine Brumley
CBD-FORM-1730	Madeline Banschbach

CBD-FORM-1731	madeline moroff
CBD-FORM-1732	Madiha Hussaini
CBD-FORM-1733	madonna lennon
CBD-FORM-1734	maggie hunter depaulo
CBD-FORM-1735	Mairi Meredith
CBD-FORM-1736	Malcolm MacPherson, PhD
CBD-FORM-1737	Malva McIntosh
CBD-FORM-1738	mana hideki
CBD-FORM-1739	Mandy Stone
CBD-FORM-1740	Maneesh Pangasa
CBD-FORM-1741	Manolo Segura MacDonald
CBD-FORM-1742	Marc Gregory
CBD-FORM-1743	marchez shurn
CBD-FORM-1744	Marci McCartney
CBD-FORM-1745	Marcia Bonta
CBD-FORM-1746	Marcia Cohen
CBD-FORM-1747	Marcia McDuffie
CBD-FORM-1748	Marcia Ostrowski
CBD-FORM-1749	marcia ritz
CBD-FORM-1750	Marcus Lanskey
CBD-FORM-1751	Marcy Andersen
CBD-FORM-1752	Margaret Herten
CBD-FORM-1753	margaret lohr
CBD-FORM-1754	Margaret Silver
CBD-FORM-1755	Margaret Welke
CBD-FORM-1756	Margaret Wood
CBD-FORM-1757	Margean Kastner
CBD-FORM-1758	Margie Culbertson
CBD-FORM-1759	Margit Meissner-Jackson
CBD-FORM-1760	Marguerite Cambria
CBD-FORM-1761	Marguery Lee Zucker
CBD-FORM-1762	mari betancur
CBD-FORM-1763	Mari T. Echevarria
CBD-FORM-1764	Maria Alicandu-Thurman
CBD-FORM-1765	MARIA ALONSO
CBD-FORM-1766	Maria Borges
CBD-FORM-1767	Maria Deliou
CBD-FORM-1768	maria edlund
CBD-FORM-1769	Maria Luongo
CBD-FORM-1770	Maria Nasif
CBD-FORM-1771	maria nazzaro
CBD-FORM-1772	Maria van Dingenen
CBD-FORM-1773	Maria Williamson
CBD-FORM-1774	Marian Baker Gierlach
CBD-FORM-1775	Marian Cooley
CBD-FORM-1776	Marian Donovan
CBD-FORM-1777	Marianna Delinck Manley
CBD-FORM-1778	Marianne Brettell-Vaughn
CBD-FORM-1779	Marie Harding
CBD-FORM-	Marie Louise Morandi

1780	Long Zwicker
CBD-FORM-1781	Marie Morrissey
CBD-FORM-1782	Marie Nickell
CBD-FORM-1783	Marie Wadman
CBD-FORM-1784	Marie-Gabrielle Claudot
CBD-FORM-1785	Marija Minic
CBD-FORM-1786	marijo ahnger
CBD-FORM-1787	Marika Wilde
CBD-FORM-1788	Mariko Powers
CBD-FORM-1789	Marilee Urban
CBD-FORM-1790	MARILYN & TOM FINNELLI
CBD-FORM-1791	Marilyn Katherine Coats
CBD-FORM-1792	Marilynn Smith
CBD-FORM-1793	Marin Xiques
CBD-FORM-1794	marina jelicic
CBD-FORM-1795	marina krikunova
CBD-FORM-1796	Marine Loos <mlcourriel-

CBD-FORM-1797	Marinell Daniel
CBD-FORM-1798	mario giannone
CBD-FORM-1799	Marion Ehrlich
CBD-FORM-1800	Marion Kraus
CBD-FORM-1801	Marisa Ferreira
CBD-FORM-1802	marisa landsberg
CBD-FORM-1803	Marissa Dupont
CBD-FORM-1804	Marissa Weber
CBD-FORM-1805	Marit Mussche
CBD-FORM-1806	Marjorie Lev
CBD-FORM-1807	Mark Chudzik
CBD-FORM-1808	Mark Donaldson
CBD-FORM-1809	Mark Hallett
CBD-FORM-1810	Mark Hein
CBD-FORM-1811	Mark Helman
CBD-FORM-1812	Mark Hotchkiss
CBD-FORM-	Mark J. Fiore

1813	
CBD-FORM-1814	Mark Larsen
CBD-FORM-1815	Mark M Giese
CBD-FORM-1816	mark noethen
CBD-FORM-1817	mark porter
CBD-FORM-1818	MARK SALAMON
CBD-FORM-1819	Mark Sentesy
CBD-FORM-1820	Mark Sousa
CBD-FORM-1821	Mark Waltzer
CBD-FORM-1822	Mark Weinberger
CBD-FORM-1823	Marlena Lange
CBD-FORM-1824	Marlene Bruce
CBD-FORM-1825	Marlowe Mager
CBD-FORM-1826	Marrk Elman
CBD-FORM-1827	Marsha Penner
CBD-FORM-1828	Marsha Talifarro
CBD-FORM-1829	Marsha Wheaton

CBD-FORM-1830	Marsha Wilson
CBD-FORM-1831	MARTA DE LA FUENTE
CBD-FORM-1832	Marta Zamora
CBD-FORM-1833	Martha Eberle
CBD-FORM-1834	Martha Izzo
CBD-FORM-1835	Martha Land
CBD-FORM-1836	Martha Spencer
CBD-FORM-1837	Martha Stopa
CBD-FORM-1838	Martha Thompson
CBD-FORM-1839	martin Antuna
CBD-FORM-1840	Martin Ferwerda
CBD-FORM-1841	martin kerrigan
CBD-FORM-1842	Martina Lerede
CBD-FORM-1843	Martina Patterson
CBD-FORM-1844	Mary Alexander
CBD-FORM-1845	Mary Ann and Frank Graffagnino
CBD-FORM-1846	Mary Ann Burke
CBD-FORM-1847	Mary Barbezat
CBD-FORM-1848	Mary Barkalow
CBD-FORM-1849	MARY BAYSINGER
CBD-FORM-1850	mary berges
CBD-FORM-1851	Mary Carrick
CBD-FORM-1852	mary costello
CBD-FORM-1853	Mary Eldredge
CBD-FORM-1854	Mary Fineran
CBD-FORM-1855	Mary Hoffmann
CBD-FORM-1856	Mary Hood
CBD-FORM-1857	Mary Levitt
CBD-FORM-1858	Mary Lou Finley
CBD-FORM-1859	Mary Lou Pierron
CBD-FORM-1860	Mary Lou Rynkiewicz
CBD-FORM-1861	Mary Metcalf
CBD-FORM-1862	Mary Reed
CBD-FORM-1863	mary rivas
CBD-FORM-1864	mary rojeski
CBD-FORM-1865	Mary Savoia
CBD-FORM-1866	Mary Schor
CBD-FORM-1867	mary stark
CBD-FORM-1868	Mary Wiebe
CBD-FORM-1869	maryalice carroll
CBD-FORM-1870	Maryalice Webb
CBD-FORM-1871	Maryann Emery
CBD-FORM-1872	maryg green
CBD-FORM-1873	maryg green
CBD-FORM-1874	maryke petruzzi
CBD-FORM-1875	marylou eastes
CBD-FORM-1876	Mathew Christianson
CBD-FORM-1877	Mathew Wilson
CBD-FORM-1878	Matt Burgess
CBD-FORM-	Matt Mabee

1879	
CBD-FORM-1880	Matt Maras
CBD-FORM-1881	Matt Otto
CBD-FORM-1882	Matthew Boruta
CBD-FORM-1883	Matthew Finch
CBD-FORM-1884	Matthew Flores
CBD-FORM-1885	Matthew Iskra
CBD-FORM-1886	Matthew James
CBD-FORM-1887	Matthew Stainton
CBD-FORM-1888	Maura O'Connor
CBD-FORM-1889	Maurice Rosenstraus
CBD-FORM-1890	Max Jewett
CBD-FORM-1891	Maya Robinson
CBD-FORM-1892	Meaghan Leavitt
CBD-FORM-1893	Meda Jo Glover
CBD-FORM-1894	Megan Brodie
CBD-FORM-1895	Megan Horn

CBD-FORM-1896	MEGAN LEHMAN
CBD-FORM-1897	Megan McEachern
CBD-FORM-1898	Megan Richardson
CBD-FORM-1899	Megan Roemer
CBD-FORM-1900	Megan Vohs
CBD-FORM-1901	Meghan Prior
CBD-FORM-1902	mel jordan
CBD-FORM-1903	Melanie Alexander
CBD-FORM-1904	Melanie Andrus
CBD-FORM-1905	Melanie McCormick
CBD-FORM-1906	Melinda Bashen
CBD-FORM-1907	Melinda McComb
CBD-FORM-1908	Melissa Allen
CBD-FORM-1909	Melissa Britton
CBD-FORM-1910	Melissa Cathcart
CBD-FORM-1911	Melissa Conrad
CBD-FORM-	Melissa Hanmer

1912	
CBD-FORM-1913	Melissa Kasch
CBD-FORM-1914	Melissa Migliore
CBD-FORM-1915	Melissa Sharp
CBD-FORM-1916	Melissa Stimpfle
CBD-FORM-1917	Melissa Tomaszewski
CBD-FORM-1918	Melissa White
CBD-FORM-1919	Mercedes Castro Pita
CBD-FORM-1920	Mercedes Lackey
CBD-FORM-1921	Mercedes Smith
CBD-FORM-1922	Meredith Wade
CBD-FORM-1923	meri dreyfuss
CBD-FORM-1924	Merrill Kramer
CBD-FORM-1925	Mervi Rantala
CBD-FORM-1926	Meyer Jordan
CBD-FORM-1927	Meyer Scharlack
CBD-FORM-1928	Mica McCall

CBD-FORM-1929	michael albrecht
CBD-FORM-1930	Michael Allen
CBD-FORM-1931	Michael Ambroszewski
CBD-FORM-1932	michael chase
CBD-FORM-1933	Michael Cloud
CBD-FORM-1934	michael corbin
CBD-FORM-1935	Michael Denton
CBD-FORM-1936	Michael Deuell
CBD-FORM-1937	Michael Dophn
CBD-FORM-1938	Michael Dulock
CBD-FORM-1939	Michael Feran
CBD-FORM-1940	Michael Fine
CBD-FORM-1941	Michael Guckian
CBD-FORM-1942	Michael Hamburger
CBD-FORM-1943	Michael Harrington
CBD-FORM-1944	Michael Haskell
CBD-FORM-1945	michael hazynski
CBD-FORM-1946	Michael Kavanaugh
CBD-FORM-1947	Michael King
CBD-FORM-1948	Michael Kutilek
CBD-FORM-1949	Michael Lawrence
CBD-FORM-1950	michael levitt
CBD-FORM-1951	Michael Martin
CBD-FORM-1952	Michael Masley
CBD-FORM-1953	michael Miller
CBD-FORM-1954	Michael Neil
CBD-FORM-1955	Michael Oaks
CBD-FORM-1956	Michael Ott
CBD-FORM-1957	Michael Rotcher
CBD-FORM-1958	Michael Stuart
CBD-FORM-1959	michael szymanski
CBD-FORM-1960	Michael Tackett
CBD-FORM-1961	Michael Terry
CBD-FORM-1962	Michael Wagner
CBD-FORM-1963	michael waters
CBD-FORM-1964	Michael Wisti
CBD-FORM-1965	Michael Woelfel
CBD-FORM-1966	Michael Wood
CBD-FORM-1967	Michalis Theodosiou
CBD-FORM-1968	Michele Nihipali
CBD-FORM-1969	michele Ozuna
CBD-FORM-1970	Michele Rae
CBD-FORM-1971	Michele Remenar
CBD-FORM-1972	Michele Rozga
CBD-FORM-1973	Michele Shimizu
CBD-FORM-1974	Michele von Kampen
CBD-FORM-1975	Michelle Bafik-Vehslage
CBD-FORM-1976	Michelle Bogden Muetzel
CBD-FORM-1977	Michelle Buerger
CBD-FORM-	Michelle Cook

1978	
CBD-FORM-1979	Michelle D.
CBD-FORM-1980	Michelle Dudeck
CBD-FORM-1981	Michelle G
CBD-FORM-1982	Michelle Hoff
CBD-FORM-1983	Michelle Jones
CBD-FORM-1984	Michelle Kofler
CBD-FORM-1985	Michelle Pavcovich
CBD-FORM-1986	MICHELLE SOULE
CBD-FORM-1987	Michelle Wilkes
CBD-FORM-1988	Micky Mars
CBD-FORM-1989	Mieke Fay
CBD-FORM-1990	Miguel Godinez
CBD-FORM-1991	Miiru Lex
CBD-FORM-1992	Mijanou Bauchau
CBD-FORM-1993	Mike Hansen
CBD-FORM-1994	mike hlat

CBD-FORM-1995	mike mcginn
CBD-FORM-1996	Mike Seeber
CBD-FORM-1997	Mike VanLandingham
CBD-FORM-1998	Mike Weyand
CBD-FORM-1999	Milada Lee
CBD-FORM-2000	Millard Farr
CBD-FORM-2001	Milton Nelson
CBD-FORM-2002	ming ong
CBD-FORM-2003	Miranda Rumpf
CBD-FORM-2004	Mircea Nita
CBD-FORM-2005	Mirella Ostrec
CBD-FORM-2006	Misako Hill
CBD-FORM-2007	Mollie Thomas
CBD-FORM-2008	Molly McCormick
CBD-FORM-2009	Molly Mendez
CBD-FORM-2010	Molly Monroe
CBD-FORM-	Mona Mehas

2011	
CBD-FORM-2012	Monica Gilman
CBD-FORM-2013	monica russo
CBD-FORM-2014	Monica Salazar
CBD-FORM-2015	Monika Gosteli-Gyger
CBD-FORM-2016	Monique Agia
CBD-FORM-2017	moo Niemeyer
CBD-FORM-2018	Morgan Clark
CBD-FORM-2019	Mr and Mrs James Denison
CBD-FORM-2020	Mr and Mrs Richard N Huff
CBD-FORM-2021	MR. & MRS. BRUCE REVESZ
CBD-FORM-2022	Mr. David Barker
CBD-FORM-2023	Mrs. G F Lull
CBD-FORM-2024	Mrs. Marie Russell-Barker
CBD-FORM-2025	Ms. M L Beckham
CBD-FORM-2026	MURLIN GOEKEN
CBD-FORM-2027	Mylee Khristoforov

CBD-FORM-2028	Myles Robertson
CBD-FORM-2029	myra berario
CBD-FORM-2030	Myra Dremeaux
CBD-FORM-2031	Mytzi Rudolph
CBD-FORM-2032	n riley
CBD-FORM-2033	Nadezhda Peneva
CBD-FORM-2034	Nadine Bierwirth
CBD-FORM-2035	nadine chatel
CBD-FORM-2036	Nahid Varjavand
CBD-FORM-2037	Nancy Adams
CBD-FORM-2038	Nancy Alexander
CBD-FORM-2039	Nancy Bergey
CBD-FORM-2040	nancy booth
CBD-FORM-2041	Nancy Bristow
CBD-FORM-2042	Nancy Davlantes
CBD-FORM-2043	Nancy Donker
CBD-FORM-2044	Nancy Grimes
CBD-FORM-2045	Nancy Herlinger
CBD-FORM-2046	Nancy Hoffman
CBD-FORM-2047	Nancy Kohut
CBD-FORM-2048	Nancy Ledgerwood
CBD-FORM-2049	Nancy Meadows
CBD-FORM-2050	Nancy Neumann
CBD-FORM-2051	nancy passarelli
CBD-FORM-2052	Nancy Sagatelian
CBD-FORM-2053	Nancy Widman
CBD-FORM-2054	Naomi Fatouros
CBD-FORM-2055	Naomi Korner
CBD-FORM-2056	Naomi Lee-Hood
CBD-FORM-2057	Naomi Weinstein
CBD-FORM-2058	Napapon Preechastien
CBD-FORM-2059	Natalie Corkran
CBD-FORM-2060	Natalie Duleba
CBD-FORM-2061	Natalie Hodapp
CBD-FORM-2062	Natalie Martinez
CBD-FORM-2063	Natalie Meadows
CBD-FORM-2064	natalie oshin
CBD-FORM-2065	Natalie Van Leekwijck
CBD-FORM-2066	Natalie Zarchin
CBD-FORM-2067	Natascha Israel
CBD-FORM-2068	Natasha Shpiller
CBD-FORM-2069	nayana teixe
CBD-FORM-2070	Nayda Cruz Harris
CBD-FORM-2071	Neil Narbonne
CBD-FORM-2072	Neill Adhikari
CBD-FORM-2073	Nelly Benko-Hakim
CBD-FORM-2074	Netta Kausalik
CBD-FORM-2075	Nezka Pfeifer
CBD-FORM-2076	Nhelson Jaramillo
CBD-FORM-	Niall Carroll

2077	
CBD-FORM-2078	Nicholas Esser
CBD-FORM-2079	Nichole Ebel-Bailey
CBD-FORM-2080	Nick Hood
CBD-FORM-2081	Nick Maniatis
CBD-FORM-2082	Nick Rodin
CBD-FORM-2083	Nicole Capizzi
CBD-FORM-2084	Nicole Lugo
CBD-FORM-2085	Nicole Pollock
CBD-FORM-2086	Nicole Porco
CBD-FORM-2087	Nicole Reicher
CBD-FORM-2088	Nicole Strathmann
CBD-FORM-2089	nicole zaban
CBD-FORM-2090	nicolette ludolphi
CBD-FORM-2091	Nicory Madia
CBD-FORM-2092	Nikhil Rau
CBD-FORM-2093	nikki Ayres

CBD-FORM-2094	Nikki Wojtalik
CBD-FORM-2095	Nina Fry
CBD-FORM-2096	NINA GONDOS
CBD-FORM-2097	Nina Kornstein
CBD-FORM-2098	Noel Hutchings
CBD-FORM-2099	Noel Parenti
CBD-FORM-2100	Nolan Farkas
CBD-FORM-2101	Norbert Nitsch
CBD-FORM-2102	Norma McNeill
CBD-FORM-2103	Olivia Lim
CBD-FORM-2104	Olivier Lapeyre
CBD-FORM-2105	Oscar Revilla Alguacil
CBD-FORM-2106	OSKAR & MATHIAS OBRIST
CBD-FORM-2107	ovadia moshe
CBD-FORM-2108	P D
CBD-FORM-2109	P Greatrix
CBD-FORM-	Pam Alleman

2110	
CBD-FORM-2111	Pam Niedermayer
CBD-FORM-2112	pam polcyn
CBD-FORM-2113	pam roth
CBD-FORM-2114	Pam Shaouy
CBD-FORM-2115	Pam York
CBD-FORM-2116	pamela a
CBD-FORM-2117	pamela Curtis
CBD-FORM-2118	Pamela Fausty
CBD-FORM-2119	Pamela Kjono
CBD-FORM-2120	Pamela McCall
CBD-FORM-2121	Pamela Meade
CBD-FORM-2122	Pamela Miko
CBD-FORM-2123	Pamela Reckers
CBD-FORM-2124	Pamela Scoville
CBD-FORM-2125	Panagiotis Rigopoulos
CBD-FORM-2126	Pat Arnone

CBD-FORM-2127	Pat Barnes
CBD-FORM-2128	pat mace
CBD-FORM-2129	Patrice Cole
CBD-FORM-2130	Patricia Alejandro
CBD-FORM-2131	Patricia Chang
CBD-FORM-2132	Patricia Clements
CBD-FORM-2133	patricia daniels
CBD-FORM-2134	Patricia Gracian
CBD-FORM-2135	PATRICIA GRAZIANO
CBD-FORM-2136	patricia herpich
CBD-FORM-2137	Patricia Lauer
CBD-FORM-2138	Patricia Lessard
CBD-FORM-2139	Patricia Morgan
CBD-FORM-2140	Patricia Nickles
CBD-FORM-2141	patricia o'shaughnessy
CBD-FORM-2142	Patricia Rodgers
CBD-FORM-2143	Patricia Sikora
CBD-FORM-2144	Patricia Smith
CBD-FORM-2145	Patrick Aubuchon
CBD-FORM-2146	PATRICK COSGROVE
CBD-FORM-2147	Patrick Deming
CBD-FORM-2148	Patrick Murphy
CBD-FORM-2149	Patrick O'Neil
CBD-FORM-2150	Patrick Rhea
CBD-FORM-2151	patrick romain
CBD-FORM-2152	Patrick Ryel
CBD-FORM-2153	Patrick Studt
CBD-FORM-2154	Patrick Wojahn
CBD-FORM-2155	patti kerkhoff
CBD-FORM-2156	Patti Packer
CBD-FORM-2157	Paul Bechtel
CBD-FORM-2158	paul damian
CBD-FORM-2159	Paul Grohman
CBD-FORM-2160	Paul Grove
CBD-FORM-2161	Paul Haseman
CBD-FORM-2162	Paul Kazmercyk
CBD-FORM-2163	Paul Keables
CBD-FORM-2164	Paul Komishock
CBD-FORM-2165	Paul Mayer
CBD-FORM-2166	Paul Moss
CBD-FORM-2167	paul nitsch
CBD-FORM-2168	Paul Sinacore
CBD-FORM-2169	paul slapinski
CBD-FORM-2170	paul smith
CBD-FORM-2171	paul smith
CBD-FORM-2172	Paul Waybrant
CBD-FORM-2173	Paul West
CBD-FORM-2174	Paula Cox
CBD-FORM-2175	Paula Minklei
CBD-FORM-	Paula Pruner

2176	
CBD-FORM-2177	Paulette Zimmerman
CBD-FORM-2178	Pauline Lee
CBD-FORM-2179	Pauline Schmidt
CBD-FORM-2180	Peg LeClair
CBD-FORM-2181	Peg Parham
CBD-FORM-2182	Peggy England
CBD-FORM-2183	Peggy Heisel
CBD-FORM-2184	pete childs
CBD-FORM-2185	Peter Collins
CBD-FORM-2186	Peter Curia
CBD-FORM-2187	Peter F. Schultz
CBD-FORM-2188	Peter Frieary
CBD-FORM-2189	Peter J. Callizo
CBD-FORM-2190	Peter Karlsson
CBD-FORM-2191	Peter Klosterman
CBD-FORM-2192	peter morrow

CBD-FORM-2193	Peter Paraskevopoulos
CBD-FORM-2194	Peter Pray
CBD-FORM-2195	peter rubin
CBD-FORM-2196	Peter Stone
CBD-FORM-2197	Peter Sweeny
CBD-FORM-2198	Petra Tippersma
CBD-FORM-2199	Philip De Rosa
CBD-FORM-2200	Philip Heinlein
CBD-FORM-2201	Philip Hult
CBD-FORM-2202	Philip Madruga
CBD-FORM-2203	Philip Ratcliff
CBD-FORM-2204	Philipp Reining
CBD-FORM-2205	Phillip Kehn
CBD-FORM-2206	Phoebe Oaks
CBD-FORM-2207	Phyllis Mollen
CBD-FORM-2208	Phyllis Murdoch
CBD-FORM-	PI Norton

2209	
CBD-FORM-2210	Pier Giorgio Nicoletti
CBD-FORM-2211	pinky jain pan
CBD-FORM-2212	PK Doyle
CBD-FORM-2213	Polly Lavery
CBD-FORM-2214	Potsy Brothag
CBD-FORM-2215	Prem Mulberry
CBD-FORM-2216	Quentin Fischer
CBD-FORM-2217	R Belsher
CBD-FORM-2218	R D
CBD-FORM-2219	R Espoz
CBD-FORM-2220	r springer
CBD-FORM-2221	R Webber
CBD-FORM-2222	R Wells
CBD-FORM-2223	R. Fitzgerald
CBD-FORM-2224	R. M. St. Angelo
CBD-FORM-2225	R. Stoddard

CBD-FORM-2226	r.a. schumal
CBD-FORM-2227	Rachael Montague
CBD-FORM-2228	Rachel Ford
CBD-FORM-2229	Rachel Griffith
CBD-FORM-2230	rachel myers
CBD-FORM-2231	Rachel Usher
CBD-FORM-2232	Rachelle Greene
CBD-FORM-2233	Rafael Horowitz Friedman
CBD-FORM-2234	Ragen Tilzey, CPA
CBD-FORM-2235	Ralph Tanner
CBD-FORM-2236	Ralph Tuscher
CBD-FORM-2237	Ran Zirasri
CBD-FORM-2238	Randy Kessler
CBD-FORM-2239	Randy Lloyd
CBD-FORM-2240	randy sailer
CBD-FORM-2241	Rastic Samela
CBD-FORM-2242	Raul Arribas
CBD-FORM-2243	Raven Wilkins
CBD-FORM-2244	Raymond Mlynczak
CBD-FORM-2245	Reba Stone
CBD-FORM-2246	Rebecca Ballard
CBD-FORM-2247	Rebecca Crowder
CBD-FORM-2248	rebecca ferrell
CBD-FORM-2249	Rebecca Finley
CBD-FORM-2250	Rebecca Gray
CBD-FORM-2251	Rebecca Kosar
CBD-FORM-2252	Rebecca Lippa
CBD-FORM-2253	Rebecca Ryan
CBD-FORM-2254	Rebecca Safron
CBD-FORM-2255	Rebecca Stover
CBD-FORM-2256	Rebecca Summer
CBD-FORM-2257	Reed Hanson
CBD-FORM-2258	Reesha tuomi
CBD-FORM-2259	Regina Barth
CBD-FORM-2260	Regina DeFalco Lippert
CBD-FORM-2261	Regina Dickerson
CBD-FORM-2262	Regina Marino
CBD-FORM-2263	Regina Minniss
CBD-FORM-2264	Reiner Siebke
CBD-FORM-2265	Rejane Souza
CBD-FORM-2266	Renae Bowman
CBD-FORM-2267	Renae Thompson
CBD-FORM-2268	Rev Crow Swimsaway PhD
CBD-FORM-2269	Rev Curt Miner
CBD-FORM-2270	Rhonda Bradley
CBD-FORM-2271	Rhonda Kohl
CBD-FORM-2272	Rhonda Lynn
CBD-FORM-2273	Ricardo U. Berg
CBD-FORM-2274	Rich Smith
CBD-FORM-	Richard Curtis

2275	
CBD-FORM-2276	RICHARD ELLIOTT
CBD-FORM-2277	Richard Glassberg
CBD-FORM-2278	Richard Han
CBD-FORM-2279	Richard Heaning
CBD-FORM-2280	RICHARD HERKALO
CBD-FORM-2281	Richard Hunt
CBD-FORM-2282	richard jackson
CBD-FORM-2283	Richard Lee
CBD-FORM-2284	Richard Leonard
CBD-FORM-2285	Richard Norman Talley
CBD-FORM-2286	Richard Quinones
CBD-FORM-2287	Richard Robinson
CBD-FORM-2288	Richard Schwartz
CBD-FORM-2289	Richard Shepard
CBD-FORM-2290	Richard Spotts
CBD-FORM-2291	Rick Hammel

CBD-FORM-2292	Rick LaPorte
CBD-FORM-2293	Ricki Newman
CBD-FORM-2294	Rikje Maria Ruiter
CBD-FORM-2295	Rina Hudson
CBD-FORM-2296	Rita Buckhannon
CBD-FORM-2297	Rita Casolari
CBD-FORM-2298	Rita Ryan
CBD-FORM-2299	RJ Bordelon
CBD-FORM-2300	Rob Gonzalez
CBD-FORM-2301	Rob Nash
CBD-FORM-2302	Robb Cavanagh
CBD-FORM-2303	Robert Allen
CBD-FORM-2304	Robert Bausch
CBD-FORM-2305	Robert Cierlitsky
CBD-FORM-2306	robert du Rivage
CBD-FORM-2307	Robert Duffy
CBD-FORM-	Robert Ellis

2308	
CBD-FORM-2309	Robert Fitzgerald
CBD-FORM-2310	Robert Hicks
CBD-FORM-2311	Robert Honish
CBD-FORM-2312	Robert Houskeeper
CBD-FORM-2313	Robert Jacobson
CBD-FORM-2314	Robert Joll
CBD-FORM-2315	robert levitt
CBD-FORM-2316	Robert Liedike
CBD-FORM-2317	Robert Lombardi
CBD-FORM-2318	Robert McCombs
CBD-FORM-2319	ROBERT MORGAN
CBD-FORM-2320	Robert Nickerson
CBD-FORM-2321	Robert Peterson
CBD-FORM-2322	robert Puca
CBD-FORM-2323	Robert Roberto
CBD-FORM-2324	Robert Roman

CBD-FORM-2325	Robert Sargent
CBD-FORM-2326	Robert Tafanelli
CBD-FORM-2327	Robert Webster
CBD-FORM-2328	Robert Weingart
CBD-FORM-2329	Robert Weld
CBD-FORM-2330	Robert Williams
CBD-FORM-2331	roberta claypool
CBD-FORM-2332	Roberta Froome
CBD-FORM-2333	Roberta Heita
CBD-FORM-2334	Roberta Zenz
CBD-FORM-2335	Roberto Angarita Vargas
CBD-FORM-2336	Roberto de Angelis
CBD-FORM-2337	robin lim
CBD-FORM-2338	Robin Lindheimer
CBD-FORM-2339	Robin Poppe
CBD-FORM-2340	Robin Stalbaum
CBD-FORM-2341	Robin Steudle
CBD-FORM-2342	robin vogler
CBD-FORM-2343	rodney hemmila
CBD-FORM-2344	Roger Hannah
CBD-FORM-2345	roger schmidt
CBD-FORM-2346	Rolf Stuber
CBD-FORM-2347	Ron Avila
CBD-FORM-2348	Ron Kloberdanz
CBD-FORM-2349	ron rediger
CBD-FORM-2350	Ron Tuason
CBD-FORM-2351	Ronald Brown
CBD-FORM-2352	Ronald D. McVeigh
CBD-FORM-2353	Ronald H. Silver, C.E.P.
CBD-FORM-2354	Ronald Kestler
CBD-FORM-2355	Ronald Smith
CBD-FORM-2356	Rosa Barragan
CBD-FORM-2357	Rosa Perez
CBD-FORM-2358	Rosalie Schneider
CBD-FORM-2359	Rosamund Downing
CBD-FORM-2360	Rose Bertrand
CBD-FORM-2361	Rose Marie Stef
CBD-FORM-2362	Rose Ogorzaly
CBD-FORM-2363	Rosemarie Chinni-Edwards
CBD-FORM-2364	Rosemary Graham-Gardner
CBD-FORM-2365	Rosiris Paniagua
CBD-FORM-2366	Ross Hammersley
CBD-FORM-2367	Ross Kelsonpetit
CBD-FORM-2368	Rowena Wyckoff
CBD-FORM-2369	Roxann Shadrick
CBD-FORM-2370	roxie schliesmann
CBD-FORM-2371	Roxy Gray
CBD-FORM-2372	Roy Buchanan
CBD-FORM-2373	roy fuller
CBD-FORM-	Ruaidhri Crofton

2374	
CBD-FORM-2375	Russell Landau
CBD-FORM-2376	Russell Naylor
CBD-FORM-2377	Russell Weisz
CBD-FORM-2378	Ruth Barrett
CBD-FORM-2379	Ruth Gedge
CBD-FORM-2380	Ruth Johnston
CBD-FORM-2381	Ruth Lombard
CBD-FORM-2382	Ruth Mendelson
CBD-FORM-2383	Ruth Miller
CBD-FORM-2384	RuthAnne Dayton
CBD-FORM-2385	Ryan McIntyre
CBD-FORM-2386	S Logan
CBD-FORM-2387	s Pryputniewicz
CBD-FORM-2388	s woodruff
CBD-FORM-2389	S. Julie Tankenson
CBD-FORM-2390	s. owens

CBD-FORM-2391	S.Christopher Jacobs
CBD-FORM-2392	S.S. Shaw
CBD-FORM-2393	sabine greger
CBD-FORM-2394	Sadira Tash
CBD-FORM-2395	Sallie Rose Sandler
CBD-FORM-2396	sam asseff
CBD-FORM-2397	Sam Child
CBD-FORM-2398	Sammy Low
CBD-FORM-2399	SANDRA ALBO
CBD-FORM-2400	Sandra Beatty
CBD-FORM-2401	Sandra Cobb
CBD-FORM-2402	Sandra Couch
CBD-FORM-2403	Sandra Franz
CBD-FORM-2404	Sandra Johnson
CBD-FORM-2405	Sandra Joos
CBD-FORM-2406	Sandra Stock
CBD-FORM-	Sandra Weisman

2407	
CBD-FORM-2408	Sandy Brooks
CBD-FORM-2409	Sandy Levine
CBD-FORM-2410	sandy liu
CBD-FORM-2411	Sandy Lynch
CBD-FORM-2412	Sandy McNeal
CBD-FORM-2413	Sandy Sagitto
CBD-FORM-2414	Sara breakfield
CBD-FORM-2415	Sara CA Rafter
CBD-FORM-2416	Sara Esteves
CBD-FORM-2417	Sara I Kennedy
CBD-FORM-2418	Sara Miller
CBD-FORM-2419	Sara Schroeder
CBD-FORM-2420	sara shaw
CBD-FORM-2421	Sara Thomas
CBD-FORM-2422	Sarah Alvarez
CBD-FORM-2423	Sarah B Stewart

CBD-FORM-2424	Sarah Bassuk
CBD-FORM-2425	Sarah Bloom
CBD-FORM-2426	Sarah Estes
CBD-FORM-2427	Sarah Hafer
CBD-FORM-2428	SARAH HAMILTON
CBD-FORM-2429	Sarah McNaull
CBD-FORM-2430	Sarah Rademacher
CBD-FORM-2431	SARAH SELPH
CBD-FORM-2432	Sarah Weller
CBD-FORM-2433	Sarah Woods
CBD-FORM-2434	Saran Kirschbaum
CBD-FORM-2435	Sasha Abrahamson
CBD-FORM-2436	Sasha Kay
CBD-FORM-2437	Saskia Oskam
CBD-FORM-2438	Saskia Santos
CBD-FORM-2439	Scott Baker
CBD-FORM-2440	Scott Cecile
CBD-FORM-2441	Scott Gibson
CBD-FORM-2442	Scott Gray
CBD-FORM-2443	Scott Heinze
CBD-FORM-2444	Scott Korman
CBD-FORM-2445	Scott McNeely
CBD-FORM-2446	Scott Species
CBD-FORM-2447	Scott Steiner
CBD-FORM-2448	Scott White
CBD-FORM-2449	Sean Kilpatrick
CBD-FORM-2450	Sean O'Keeffe
CBD-FORM-2451	September Jazzborne
CBD-FORM-2452	serge vantalon
CBD-FORM-2453	Seth Laursen
CBD-FORM-2454	Shanna Cardea
CBD-FORM-2455	Shanna Goetz
CBD-FORM-2456	Shannon Hillary
CBD-FORM-2457	Shannon Mayfield-Chapin
CBD-FORM-2458	Shannon Pippin
CBD-FORM-2459	Shannon Saldana
CBD-FORM-2460	Shannon Sudderth
CBD-FORM-2461	Shannon Teper
CBD-FORM-2462	Sharon Cappuccio
CBD-FORM-2463	Sharon Cox
CBD-FORM-2464	sharon frank
CBD-FORM-2465	Sharon Jacoby
CBD-FORM-2466	Sharon Koogler
CBD-FORM-2467	SHARON LAMPI
CBD-FORM-2468	Sharon Morris
CBD-FORM-2469	Sharon Moss
CBD-FORM-2470	Sharon Stockman
CBD-FORM-2471	sharron laplante MD, MPH
CBD-FORM-2472	Sharyn Shubert
CBD-FORM-	shashi light

2473	
CBD-FORM-2474	Shauna Sparlin
CBD-FORM-2475	shawn blaesing-thompson
CBD-FORM-2476	Shawn Williamsons
CBD-FORM-2477	Shawn Wozniak
CBD-FORM-2478	Shawn Wright
CBD-FORM-2479	Shay Forstrom
CBD-FORM-2480	sheacraver@yahoo.com Craver
CBD-FORM-2481	Shelby Haukos
CBD-FORM-2482	shelley Caballero
CBD-FORM-2483	shelley frazier
CBD-FORM-2484	Sheri Bresson
CBD-FORM-2485	Sheri Varner-Munt
CBD-FORM-2486	Sherri Fryer
CBD-FORM-2487	Sherri Hawkins
CBD-FORM-2488	Sherry Chance
CBD-FORM-2489	Sherry Marsh

CBD-FORM-2490	Sherry Smith
CBD-FORM-2491	Sherry Thompson
CBD-FORM-2492	Sheryl Mariani
CBD-FORM-2493	Shirley Gilbreath
CBD-FORM-2494	Shirley Harris
CBD-FORM-2495	Shirley Nicholas
CBD-FORM-2496	Shirley Wodtke
CBD-FORM-2497	Siamak Vossoughi
CBD-FORM-2498	Siddharth Mehrotra
CBD-FORM-2499	Sierra Bingham
CBD-FORM-2500	Signe Wetteland
CBD-FORM-2501	silvia bioli
CBD-FORM-2502	Simin Nomani
CBD-FORM-2503	Simon Teolis
CBD-FORM-2504	simone leiss
CBD-FORM-2505	Sina Gulder
CBD-FORM-	Sonia Richart

2506	
CBD-FORM-2507	Sonja Malmuth
CBD-FORM-2508	Sonja Siebke
CBD-FORM-2509	Sophi Zimmerman
CBD-FORM-2510	Sophie Miranda
CBD-FORM-2511	Sophie Teitelbaum
CBD-FORM-2512	Spencer Selander
CBD-FORM-2513	Stacey Bishop
CBD-FORM-2514	STACIE CHARLEBOIS
CBD-FORM-2515	Stan Shappell
CBD-FORM-2516	Stanley Charles
CBD-FORM-2517	Stanley Naftaly
CBD-FORM-2518	stefania perotti
CBD-FORM-2519	Stefano Fragasso
CBD-FORM-2520	Steph Klingele
CBD-FORM-2521	Stephan Donovan
CBD-FORM-2522	Stephanie Aston

CBD-FORM-2523	Stephanie Avant
CBD-FORM-2524	Stephanie Corona
CBD-FORM-2525	Stephanie Fraissl
CBD-FORM-2526	Stephanie Jackson
CBD-FORM-2527	Stephanie Johnson
CBD-FORM-2528	Stephanie Kaplan
CBD-FORM-2529	Stephanie Malara
CBD-FORM-2530	Stephanie Proctor
CBD-FORM-2531	Stephanie Sweas
CBD-FORM-2532	Stephanie Williams
CBD-FORM-2533	Stephanie Winchester
CBD-FORM-2534	Stephen Blakely
CBD-FORM-2535	Stephen Canning
CBD-FORM-2536	Stephen Dreher
CBD-FORM-2537	Stephen Ekholm
CBD-FORM-2538	Stephen Hunts
CBD-FORM-2539	Stephen La Serra
CBD-FORM-2540	Stephen Lubin
CBD-FORM-2541	Stephen Nong
CBD-FORM-2542	Stephen Paddock
CBD-FORM-2543	Stephen Sleeper
CBD-FORM-2544	Stephen Woodard
CBD-FORM-2545	Stephen Zerefos
CBD-FORM-2546	Steve Donoso
CBD-FORM-2547	Steve Friedman
CBD-FORM-2548	Steve Kokol
CBD-FORM-2549	steve lucas
CBD-FORM-2550	Steve Olson
CBD-FORM-2551	Steve Overton
CBD-FORM-2552	steve simmons
CBD-FORM-2553	Steven Campbell
CBD-FORM-2554	Steven Carter
CBD-FORM-2555	Steven Federman
CBD-FORM-2556	Steven Fenster
CBD-FORM-2557	Steven Mineck
CBD-FORM-2558	Stewart Lone
CBD-FORM-2559	Stoyan Dimitrov
CBD-FORM-2560	stu phillip
CBD-FORM-2561	SUBRATTY Abdool Karrimbaccus
CBD-FORM-2562	Sue and John Morris
CBD-FORM-2563	Sue DiCocco
CBD-FORM-2564	Sue D'Onofrio
CBD-FORM-2565	sue gries
CBD-FORM-2566	Sue Halligan
CBD-FORM-2567	sue hurley
CBD-FORM-2568	Sue Knight
CBD-FORM-2569	Sue Shimer
CBD-FORM-2570	Sue White
CBD-FORM-2571	Suey Sivula
CBD-FORM-	Susaan Aram

2572	
CBD-FORM-2573	susan biggs
CBD-FORM-2574	susan brown
CBD-FORM-2575	Susan Conway
CBD-FORM-2576	susan damato
CBD-FORM-2577	Susan Emily
CBD-FORM-2578	Susan Garcia
CBD-FORM-2579	Susan Gardner
CBD-FORM-2580	Susan Grimwood
CBD-FORM-2581	Susan Higgins
CBD-FORM-2582	Susan Hill
CBD-FORM-2583	Susan Holmes
CBD-FORM-2584	Susan Hutko
CBD-FORM-2585	Susan Inman
CBD-FORM-2586	Susan Joshua
CBD-FORM-2587	Susan King
CBD-FORM-2588	Susan Lopez-Embury

CBD-FORM-2589	Susan Meiers
CBD-FORM-2590	Susan Noyes
CBD-FORM-2591	Susan Ocopnick
CBD-FORM-2592	susan peirce
CBD-FORM-2593	Susan Reid
CBD-FORM-2594	susan sauls
CBD-FORM-2595	Susan Schuchard
CBD-FORM-2596	Susan Stout
CBD-FORM-2597	Susan Thompson
CBD-FORM-2598	Susan Thurairatnam
CBD-FORM-2599	Susan Valdivia
CBD-FORM-2600	Susan Watts
CBD-FORM-2601	susan zalon
CBD-FORM-2602	Susan Zega
CBD-FORM-2603	susanna nylander
CBD-FORM-2604	Susie & Jimmy Foot
CBD-FORM-	Suzanna Hagglof

2605	
CBD-FORM-2606	Suzanna Mast
CBD-FORM-2607	Suzanne a'Becket
CBD-FORM-2608	Suzanne Capowich
CBD-FORM-2609	Suzanne Hall
CBD-FORM-2610	Suzanne Roberson
CBD-FORM-2611	Sydney Miller
CBD-FORM-2612	Sydney Pratt
CBD-FORM-2613	sylvia anderson
CBD-FORM-2614	Sylvia De Baca
CBD-FORM-2615	Syreeta Batiste
CBD-FORM-2616	T.K. Wang
CBD-FORM-2617	Tahlia Chamberlain
CBD-FORM-2618	Taina Diaz-Reyes
CBD-FORM-2619	Tamadhur Al-Aqeel
CBD-FORM-2620	Tami Palacky
CBD-FORM-2621	Tami Velasco

CBD-FORM-2622	Tammi Newell
CBD-FORM-2623	Tammy Jones
CBD-FORM-2624	Tamsen Benson
CBD-FORM-2625	Tanja Lehmann
CBD-FORM-2626	Tanya Lewis
CBD-FORM-2627	Tara Braithwaite
CBD-FORM-2628	Tara Kokesch
CBD-FORM-2629	tasha isolani
CBD-FORM-2630	Tatiana Knotts
CBD-FORM-2631	Tawny Sherrill
CBD-FORM-2632	Ted Fishman
CBD-FORM-2633	Teresa Beutel
CBD-FORM-2634	Teri Wilson
CBD-FORM-2635	Terrance Hutchinson
CBD-FORM-2636	terrence ward
CBD-FORM-2637	terri armao
CBD-FORM-2638	Terri Ybarbo
CBD-FORM-2639	Terrie C. Williams
CBD-FORM-2640	terry andrews
CBD-FORM-2641	Terry Ellen Robinson
CBD-FORM-2642	Terry McAnaney
CBD-FORM-2643	Terry Pitt
CBD-FORM-2644	Terry Schaedig
CBD-FORM-2645	Tez Cabrera
CBD-FORM-2646	Thane Harpole
CBD-FORM-2647	the wojos
CBD-FORM-2648	thea surrey
CBD-FORM-2649	Thelma McDaniel
CBD-FORM-2650	Theresa Hauser
CBD-FORM-2651	Theresa Shiels
CBD-FORM-2652	Therese DeBing
CBD-FORM-2653	Thomas Aber
CBD-FORM-2654	thomas alexander
CBD-FORM-2655	Thomas Boyd
CBD-FORM-2656	Thomas Foster
CBD-FORM-2657	Thomas Garrett
CBD-FORM-2658	Thomas Giblin
CBD-FORM-2659	Thomas Kiernan
CBD-FORM-2660	Thomas Kindle
CBD-FORM-2661	Thomas Lindsey Hooppaw
CBD-FORM-2662	Thomas Linell
CBD-FORM-2663	Thomas Littelmann
CBD-FORM-2664	Thomas Nieland
CBD-FORM-2665	Thomas Scott
CBD-FORM-2666	Thomas Zissu
CBD-FORM-2667	Thor Alvarez
CBD-FORM-2668	Tiffaney Derreumaux
CBD-FORM-2669	Tiffany Adams
CBD-FORM-2670	tiffany formilan
CBD-FORM-	Tiffany Hutchins

2671	
CBD-FORM-2672	Tihana Pusic
CBD-FORM-2673	Tim Boelke
CBD-FORM-2674	Tim Duda
CBD-FORM-2675	Tim Werner
CBD-FORM-2676	Timothy Beckman
CBD-FORM-2677	Timothy Brennan
CBD-FORM-2678	Timothy Johnston
CBD-FORM-2679	Timothy Lawnicki
CBD-FORM-2680	Timothy Mullen
CBD-FORM-2681	Timothy Strong
CBD-FORM-2682	Tina Jaime
CBD-FORM-2683	Toby Cooper
CBD-FORM-2684	Tod Jones
CBD-FORM-2685	Todd Berliner
CBD-FORM-2686	TODD ENGLEMAN
CBD-FORM-2687	Todd Ramsey

CBD-FORM-2688	Todd Snyder
CBD-FORM-2689	Tom Finholt
CBD-FORM-2690	Tom Fuller
CBD-FORM-2691	Tom Johnson
CBD-FORM-2692	Tom Nulty Jr
CBD-FORM-2693	Toni Ganshert
CBD-FORM-2694	Toni Lubofsky
CBD-FORM-2695	Toni McCalley
CBD-FORM-2696	Toni Siegrist
CBD-FORM-2697	Tonya Cockrell
CBD-FORM-2698	Tonya Graney
CBD-FORM-2699	Tonya Hodge
CBD-FORM-2700	Tooba Syeda Hussaini
CBD-FORM-2701	Tori Thorpe
CBD-FORM-2702	Torunn Sivesind
CBD-FORM-2703	Toty García
CBD-FORM-	Tracey Ahring

2704	
CBD-FORM-2705	Tracey Mangus
CBD-FORM-2706	Tracey Zimmerman
CBD-FORM-2707	Tracy Eve
CBD-FORM-2708	Tracy Fleming
CBD-FORM-2709	Tracy Johnson
CBD-FORM-2710	tracy mclarnon
CBD-FORM-2711	Tracy Vasquez
CBD-FORM-2712	TRAVIS HARVEY
CBD-FORM-2713	Tressa Gilliland=McEnerney
CBD-FORM-2714	Trevor Good
CBD-FORM-2715	Tricia Macke
CBD-FORM-2716	Tricia Mattiello
CBD-FORM-2717	Trista Crook
CBD-FORM-2718	Tuesday Hoffman
CBD-FORM-2719	ulla schmid
CBD-FORM-2720	Uta Cortimilia

CBD-FORM-2721	v walson
CBD-FORM-2722	V. Alexander
CBD-FORM-2723	Val DeGrace
CBD-FORM-2724	Val Price
CBD-FORM-2725	Valerie Friedman
CBD-FORM-2726	valerie gilbert
CBD-FORM-2727	Valerie Hildebrand
CBD-FORM-2728	Valerie Hill
CBD-FORM-2729	valerie rice
CBD-FORM-2730	Vanessa Favero
CBD-FORM-2731	Vanessa Porrata
CBD-FORM-2732	vanessa russo
CBD-FORM-2733	vera kauffman
CBD-FORM-2734	verfaillie claudine
CBD-FORM-2735	veronica hayes
CBD-FORM-2736	Veronique Mariën
CBD-FORM-2737	Vic Bostock
CBD-FORM-2738	Vic Burton
CBD-FORM-2739	Vicki Johnson
CBD-FORM-2740	Vicki Kruschwitz
CBD-FORM-2741	Victor Siemon
CBD-FORM-2742	Victoria Brennan
CBD-FORM-2743	Vika babakova
CBD-FORM-2744	Vikki Orlando
CBD-FORM-2745	Vince Cheap
CBD-FORM-2746	Vince Mendieta
CBD-FORM-2747	Vince Snowberger
CBD-FORM-2748	vincenzo mortolini
CBD-FORM-2749	Virgene Link
CBD-FORM-2750	Virginia Bennett
CBD-FORM-2751	Virginia Douglas
CBD-FORM-2752	VIRGINIA GOMEZ
CBD-FORM-2753	virginia robertson
CBD-FORM-2754	virginie romain
CBD-FORM-2755	Vivian Hood
CBD-FORM-2756	Vivian Valtri
CBD-FORM-2757	vivianhood@sbcglobal.net
CBD-FORM-2758	Vivianne Mosca-Clark
CBD-FORM-2759	Vladimir Strugatsky
CBD-FORM-2760	vladislav dzambic
CBD-FORM-2761	W Haas
CBD-FORM-2762	walter connelly
CBD-FORM-2763	Walter Kloefkorn
CBD-FORM-2764	Walter Koch
CBD-FORM-2765	Walter Terrell
CBD-FORM-2766	Warren Hageman
CBD-FORM-2767	Wayne B. Peters
CBD-FORM-2768	Wayne MacDonald
CBD-FORM-2769	Wayne Person
CBD-FORM-	Wayne Sieck

2770	
CBD-FORM-2771	wendy breiby
CBD-FORM-2772	wendy elkins
CBD-FORM-2773	Wendy Li
CBD-FORM-2774	wendy nan paul
CBD-FORM-2775	wendy walters
CBD-FORM-2776	wendy wamser
CBD-FORM-2777	Wendy Wiener
CBD-FORM-2778	wes weaver
CBD-FORM-2779	Whitney Hawks
CBD-FORM-2780	whitney schutt
CBD-FORM-2781	wilford stevens
CBD-FORM-2782	Will Martin
CBD-FORM-2783	Will Retzloff
CBD-FORM-2784	William C. Briggs, Jr.
CBD-FORM-2785	William Davis
CBD-FORM-2786	William Eichinger

CBD-FORM-2787	William Folsom
CBD-FORM-2788	William Frayer
CBD-FORM-2789	William G. Gonzalez
CBD-FORM-2790	William Goggin
CBD-FORM-2791	William Lerner
CBD-FORM-2792	William Lewis
CBD-FORM-2793	William Nolan
CBD-FORM-2794	William Nolan
CBD-FORM-2795	William Still Jr.
CBD-FORM-2796	William Waters
CBD-FORM-2797	Willliam Brown
CBD-FORM-2798	Wilson Ross
CBD-FORM-2799	Wolfgang Rougle
CBD-FORM-2800	Y York
CBD-FORM-2801	Yasiu Kruszynski
CBD-FORM-2802	Yogesh Angrish
CBD-FORM-	Yovonne Autrey-Schell

2803	
CBD-FORM-2804	Yoyi Steele
CBD-FORM-2805	Yvette Irwin
CBD-FORM-2806	Yvonne Allen
CBD-FORM-2807	Yvonne Hansen
CBD-FORM-2808	Yvonne Neal
CBD-FORM-2809	Yvonne van de Looij
CBD-FORM-2810	Zach Colatch
CBD-FORM-2811	Zoë Parker
CBD-FORM-2812	`soodle burke

Hobby Gem and Minerals Collectors Form Letter

Comment Code	Commenter
HGMC-FORM-01	Bobby Lai
HGMC-FORM-02	Carol Eggleston
HGMC-FORM-03	Cheryl Taylor
HGMC-FORM-04	Cynthia Ramsey
HGMC-FORM-05	George Silva
HGMC-FORM-06	Gilbert Schreiner
HGMC-FORM-07	Heather Kammerdiener
HGMC-FORM-08	Ken Lai
HGMC-FORM-09	Marshall Havner
HGMC-FORM-10	Mike Eggleston
HGMC-FORM-11	Randy Herrera

Hernandez Valley Property Owners Form Letter

Comment Code	Commenter
HVPO-FORM-01	Acevedo
HVPO-FORM-02	Aguilar
HVPO-FORM-03	Angel
HVPO-FORM-04	Arosas
HVPO-FORM-05	Arreola
HVPO-FORM-06	Balboa
HVPO-FORM-07	Barmudez
HVPO-FORM-08	Bengen
HVPO-FORM-09	Blancas
HVPO-FORM-10	Bosio
HVPO-FORM-11	Brown
HVPO-FORM-12	Burgen
HVPO-FORM-13	Carrera
HVPO-FORM-14	Cassanova
HVPO-FORM-15	Cassanova
HVPO-FORM-16	Cerda
HVPO-FORM-17	Charras
HVPO-FORM-18	Chavez
HVPO-FORM-19	Cortez
HVPO-FORM-20	Crouch
HVPO-FORM-21	Cumorlinga
HVPO-FORM-22	Cunningham
HVPO-FORM-23	Delgadillo
HVPO-FORM-24	Delgadillo
HVPO-FORM-25	Dencker
HVPO-FORM-26	Diaz
HVPO-FORM-27	Dorrough
HVPO-FORM-28	Doughour
HVPO-FORM-29	Doushgounian
HVPO-FORM-30	Doushgounian
HVPO-FORM-31	Effend

HVPO-FORM-32	Engle
HVPO-FORM-33	Eryu
HVPO-FORM-34	Fin
HVPO-FORM-35	Flores
HVPO-FORM-36	Fuentes
HVPO-FORM-37	Gamboa
HVPO-FORM-38	Gamboa
HVPO-FORM-39	Garcia
HVPO-FORM-40	Gutierez
HVPO-FORM-41	Gutierrez
HVPO-FORM-42	Guzman
HVPO-FORM-43	Haman
HVPO-FORM-44	Heal
HVPO-FORM-45	Henze
HVPO-FORM-46	Hernandez
HVPO-FORM-47	Hernandez
HVPO-FORM-48	Herrera
HVPO-FORM-49	Hicks
HVPO-FORM-50	Higaveda
HVPO-FORM-51	Johnston
HVPO-FORM-52	Jordan
HVPO-FORM-53	Jordan
HVPO-FORM-54	Kaley
HVPO-FORM-55	Kari
HVPO-FORM-56	Laporte
HVPO-FORM-57	LaRue
HVPO-FORM-58	Lazo
HVPO-FORM-59	Lee
HVPO-FORM-60	Lejes
HVPO-FORM-61	Leslie
HVPO-FORM-62	Llanos
HVPO-FORM-63	Lopez
HVPO-FORM-64	Lorkett
HVPO-FORM-65	Lucas
HVPO-FORM-66	Maas
HVPO-FORM-67	Madinaveitia
HVPO-FORM-68	Margy
HVPO-FORM-69	Martinez
HVPO-FORM-70	Martinez
HVPO-FORM-71	Martinez
HVPO-FORM-72	Martinez

HVPO-FORM-73	Martinez
HVPO-FORM-74	Martinez
HVPO-FORM-75	McKechorie
HVPO-FORM-76	Medina
HVPO-FORM-77	Medrano
HVPO-FORM-78	Menedez
HVPO-FORM-79	Mercado
HVPO-FORM-80	Miller
HVPO-FORM-81	Mironda
HVPO-FORM-82	Moore
HVPO-FORM-83	Morales
HVPO-FORM-84	Morgila
HVPO-FORM-85	Morris
HVPO-FORM-86	Murillo
HVPO-FORM-87	Nelli
HVPO-FORM-88	Norrby
HVPO-FORM-89	Olachea
HVPO-FORM-90	Orantes
HVPO-FORM-91	Ortega
HVPO-FORM-92	Ortiz
HVPO-FORM-93	Otsuki
HVPO-FORM-94	Patterson
HVPO-FORM-95	Patterson
HVPO-FORM-96	Peno
HVPO-FORM-97	Perez
HVPO-FORM-98	Plons
HVPO-FORM-99	Pourkashef
HVPO-FORM-100	Powers
HVPO-FORM-101	Prado
HVPO-FORM-102	Presnell
HVPO-FORM-103	Proctor
HVPO-FORM-104	Quevedo
HVPO-FORM-105	Ramez
HVPO-FORM-106	Ramirez
HVPO-FORM-107	Raymundo
HVPO-FORM-108	Reese
HVPO-FORM-109	Renf
HVPO-FORM-110	Rey
HVPO-FORM-111	Reyes
HVPO-FORM-112	RioJas
HVPO-FORM-113	Romella

HVPO-FORM-114	Romero
HVPO-FORM-115	Sallinger
HVPO-FORM-116	Sanchez
HVPO-FORM-117	Sanchez
HVPO-FORM-118	Sandys
HVPO-FORM-119	Stapleton
HVPO-FORM-120	Stepovich
HVPO-FORM-121	Vazquez
HVPO-FORM-122	Vega
HVPO-FORM-123	Velador
HVPO-FORM-124	Vidales
HVPO-FORM-125	Villegas
HVPO-FORM-126	Viscioni
HVPO-FORM-127	Walker
HVPO-FORM-128	Wilkinson

Table X-6; Form Letter Comment Summary & Responses

Extend Public Comment Period Form Letter

I would like to request that the Hollister Field Office grant the public a 90 day extension to the Clear Creek Management Area Draft Resource Management Plan/ Draft Environmental Impact Statement comment period, which is slated to end March 5, 2010.

The Clear Creek Management Area has been closed since May of 2008, and the BLM released a Draft Environmental Impact Statement on December 4,
2009.

It is unreasonable for the public to comment on a 700+ page document that took 18 months to write in only 90 days.

Further more the document was released right before the Christmas holiday when BLM employees in the Hollister Field Office went on vacation and were unavailable for questions and comments. Furthermore, the BLM didn't hold any Public meetings for over 30 days, and only recently on February 22, 2010 held a meeting with business owners and land owners affected by the closure.

The public needs a reasonable amount of time to comment on this document.

Response: The public comment period for the Draft CCMA RMP/EIS was extended for an additional 45 days in response to requests.

Save the Trails Form Letter

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 Stralka, 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.

Response: Refer to Common Responses Section 1C, 1D, 1F(i), 2A, 2C, 3A, 3C, 3D, 4A, 4B, and 4D.

Blue Ribbon Coalition Form Letter

The Environmental Study for Clear Creek Management Area failed to take into account the many studies showing Chrysotile should not be grouped in with other types of asbestos fibers when looking at potential carcinogenic properties.

The DEIS does not contain the Cumulative Effects of the impact on other local OHV recreation. This must be added to the DEIS with supporting documentation.

80% of the past visitors at Clear Creek Management Area were motorcyclists. The preferred alternative has no provisions for off-road motorcycle recreation. This is a total reversal of the current and historical use at CCMA. The preferred alternative should include a similar motorcycle trail mileage to what was available before the emergency closure.

The DEIS does not contain any Economic Effects of the huge impact to regional economy like gas stations, restaurants, lodging, camping supplies, etc. This must be added to the DEIS with supporting documentation.

The BLM has offered only one Alternative (D) proposing new singletrack trails. However the BLM did not choose this alternative and needs to provide the reason why.

There is additional BLM land adjacent to the CCMA that could be opened for OHV recreation. Considering the drastic measures the DEIS proposes this possibility must be considered and added to the DEIS.

The studies used to justify the closure of Clear Creek Management Area are based on 40 hour work week occupational exposure to asbestos. The visitors at CCMA are recreational users with possible exposure of only a couple of hours to a couple of days at a time. The BLM needs to consider the vastly lesser exposure of recreational visitors compared to the studies daily workplace exposure.

The BLM used an EPA report based mostly on theoretical analysis of potential asbestos exposure hazards. There have been no documented cases of lung cancer or any other asbestos related health problems related to recreational exposure at Clear Creek. The BLM should not cite reports which are not supported by actual health cases at Clear Creek.

There appear to be no documented cases of BLM employees diagnosed with cancer due to exposure at CCMA to the Chrysotile form of asbestos. These employees spend far more time in the area than recreational visitors, so if the employees are not experiencing related asbestos health problems then there must not be any real health risk.

In the alternatives, only the ones that would allow OHV use in the CCMA call out for user fees. This is discriminatory double taxation. The DEIS must be changed to either eliminate all user fees or apply them to all users.

Actual health risks could be much lower than those estimated in the CCMA assessment since the recreation area doesn't have the same exposure times as the studied occupational examples. The DEIS must consider the uncertainty rather than using worst case scenarios.

The EPA report is flawed and should not be relied upon for the agency's decision to enact a closure of the CCMA to all public use.

Response: Refer to Common Responses Section 1F(i), 2A, 3A, 3C, and 3D.

Center for Biological Diversity Form Letter

Please keep Clear Creek Management Area closed to vehicles. The EPA's Asbestos Exposure and Human Health Risk Assessment shows that any vehicle use will exceed the EPA's acceptable asbestos risk levels. Clear Creek Management Area is no place for vehicles. They simply kick up too much carcinogenic dust.

Maintaining a closure to vehicles will also help ensure that threats to the area's suite of rare plants, including the federally threatened San Benito evening primrose, will be substantially reduced.

Response: Please refer to Common Responses Section 2B and 3D.

Hobby Gem and Minerals Collectors Form Letter

We realize that management of the Clear Creek area is a complex issue. We realize that the BLM is required to submit a RMP/EIS after the EPA has determined the area to be hazardous. As concerned citizens, we are interested in only the truth. We know that under this current administration, the EPA has political agendas that use science that may be flawed. We suggest that the BLM and the EPA recognize the publication by Geologist E.J. Fowkes, PhD published June 20, 2008, titles "Geological Creek Management Area, San Benito County, California". We at the Coalinga Rockhounds Society have discussed this and we have come the conclusion that "Alternative A" is the only alternative that we prefer along with these following recommendations:

XI. There may be some health hazards in the Clear Creek area. The magnitude of which has not been firmly established. Therefore we suggest that an independent laboratory be charged with doing a serious, scientific study, concerning the possible dangers of Coalinga Chrysotile asbestos.*

D. Let the study "precisely delineate" all dangerous asbestos areas.
E. Let roads through all dangerous areas be sealed.
F. Let the study include a case study of the many past employees of the asbestos mines and mills that were once in operation many years ago. Many of these employees still reside in the Coalinga area

4. Were they disabled because of asbestosis?
5. Were they hospitalized with asbestosis?
6. Are they now suffering ill effects of their work environment?
   (b.) Explain their ill effect, if any.

XII. If there be mercury processing mills where amphibole asbestos was used for insulating pipes or boilers, let that area be closed with fences or thoroughly cleaned up.

XIII. Let rock hounds make the choice. They have read the reports and understand the risks. Let them decide if they are willing to accept the risk of rock hounding in the Clear Creek area.

*Guidebook to Geological Resources of the Coalinga District California, Second Edition by E.J. Fowkes, PhD, page 52.

XIV. Waver-of-Liability forms may be acceptable for rock hounds.

XV. Let the Condon Peak area, the Joaquin Rock area, the east slope of the CCMA, and many other obviously unindustrialized areas be opened with access roads, trails, camping, and toilet facilities.

C. Let rock hounds be permitted 24/7.
D. Access restricted, by appointment only, to certain times or dates are not conducive to good public relations and are not acceptable.

XVI. Let the public lands with grazing rights leased to local ranchers be completely open for rock hound use with points of access at nearest public road.

D. Los Gatos Road from the Condon Peak access area to Wright Mountain with no locked gates.
E. The roads that lead to Black Mountain/Joaquin Rocks that are gated by grazing lease holders be opened.
F. No longer let the grazing lease holders lock out the public so that they may control said lands for their own personal recreational benefits.

XVII. Let areas with endangered species be fenced off.

XVIII. Archeological or sites of historical significance should be viewable but protected from vandals.

C. This will include hieroglyphics, engravings, paintings, or other artifacts.
D. High fences, posting signs, and signs explaining the artifacts significance may be required.

XIX. Caves and mine shafts should be posted as “closed” to all visitors to the CCMA.

XX. The CCMA has been used for family activity for decades. Now is a times when “family” is more important than ever. Do not exclude people 18 years old and younger. This exclusion policy is generational discrimination.

B. Allow the youngest of campers, infant through 18, use of campgrounds in and around the CCMA to camp in areas deemed safe for camping (ie: Condon Peak, Black Mountain, Lion Canyon, and many others).

The social and economic impact of opening this area as suggested herein would be phenomenal. The Clear Creek area would soon become the most used and sought after place for family recreation in the state of California. The BLM would receive much applause and appreciation from everyone for their straight forward management of this complex area.

Response:

Refer to BLM response to Coalinga Rockhound Society comments and/or Common Responses Sections 1C, 1D, 1F, 3A, 3D, and 4D.

Hernandez Valley Property Owners Form Letter

BLM should not select any alternative plan for the CCMA which involves the sale of any BLM land in the Tucker Zone, or the construction of any new roads or off highway vehicle trails in the area. To do so would devastate a wonderful wildlife habitat resource. It would also jeopardize Cane Canyon, which is eligible for inclusion in the Wild and Scenic River Inventory and must be protected by the BLM.

The Tucker Zone should be used as a wildlife conservation and wilderness study area to mitigate the loss of wildlife habitat elsewhere in the CCMA. My family, friends and I fully support the East Hernandez Valley Property Owners' February 20, 2010 Public Access Proposal for the Tucker Zone and encourage the BLM to adopt such Proposal. I also incorporate by reference all of the comments set forth in the discussion outline entitled Hemandez Valley Property Owners Discussion Topics for BLM Meeting submitted to BLM on February 22, 2010 in Hollister, California.

Response:

BLM received numerous comments from a consortium of private landowners and other interested parties concerned about the potential for disposal of public lands identified in the CCMA Draft RMP/EIS. Particularly, the public lands that BLM proposed to make available for disposal in the Tucker management zone were identified as valuable wildlife habitat and an important component of a successful partnership that's being developed between private landowners and the California Department of Fish and Game (CDFG) in the Hernandez Valley. The HFO proposed disposal of the public lands surrounding Baker, Byles, and Cane Canyons in the CCMA Draft RMP/EIS citing the lack of administrative access and the potential to develop opportunities for public use and enjoyment in the Tucker management zone. However, due to the issues and concerns associated with disposal of these lands, they would be retained in public ownership under the Proposed Action and BLM would pursue partnerships with local private landowners, non-profit organizations, and CDFG to develop public easements to BLM public lands in the Tucker management zone.