UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 3 2013

Jim Kenna, State Director
Bureau of Land Management
2800 Cottage Way, Suite W-1623
Sacramento, California 95825-1886

Subject: Clear Creek Management Area Proposed Resource Management Plan and Final Environmental Impact Statement, San Benito and Fresno Counties, California [CEQ #20130080]

Dear Mr. Kenna:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

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. Our 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.

EPA supports the Bureau of Land Management's (BLM) Proposed Alternative because it will help protect human health and safety by reducing asbestos exposure, as well as significantly improve environmental resources at CCMA. We support BLM's proposal to manage impaired water bodies within CCMA to meet properly functioning condition objectives relative to beneficial uses and total maximum daily loads. We recommend that BLM prioritize restoration projects and develop appropriate restoration and maintenance methods in coordination with appropriate agencies such as the Central Valley and Central Coast Regional Water Quality Control Boards, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and U.S. Army Corps of Engineers.

We have appreciated the opportunity to work as a cooperating agency with the BLM on this Environmental Impact Statement. Please send us a copy of the Record of Decision when it becomes available. If you have any questions, please call me at (415) 972-3843 or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Enrique Manzanilla, Director
Communities and Ecosystems Division

Cc: Rick Cooper, Bureau of Land Management, Hollister Field Office
Debbie Raphael, California Department of Toxic Substances Control
Jeff Wright, California Air Resources Board
Christopher Conlin, Deputy Director, California Department of Parks and Recreation
Steven Ross, California Department of Toxic Substances Control
Richard Stedman, Monterey Bay Unified Air Pollution Control District
Samir Sheik, San Joaquin Valley Air Pollution Control District, Fresno
Teodoro Alvarez, California Department of Water Resources
Christopher Rose, Central Coast Regional Water Quality Control Board
Pam Buford, Central Valley Regional Water Quality Control Board, Fresno
J. Miesanderwier, U.S. Fish and Wildlife Service, Ventura
Ken Sanchez, U.S. Fish and Wildlife Service, Sacramento
James Wulff, U.S. Occupational Safety and Health Administration, San Francisco