

**DOCKET**

**09-AFC-9**

DATE APR 19 2010

RECD. APR 20 2010

**DECLARATION OF  
Belmont Frisbee**

I, Belmont Frisbee, declare as follows:

1. I am presently retired from the U.S. Navy where I was employed for more than 38 years as both a Physicist and Electronics Engineer.
2. I have personal, and family, experience with San Joaquin Valley Fever (Coccidioidomycosis) and Cystic Fibrosis and have contacted medical persons known to have experience with both.
3. I have lived in the Ridgecrest, California area for more than 55 years and have experienced weather extremes of this area and have dealt with the U.S. Navy both in a professional and personal way during that time.
4. I have correspondence with the Commanding Officer of the Naval Air Weapons Station, China Lake concerning the threat posed by their housing demolition and dust mitigation efforts taken during that time period.
5. I have gathered Coccidioidomycosis mortality information for the Ridgecrest jurisdiction as reported by the Kern County Department of Public Health.
5. I am personally familiar with the facts and conclusions related in the testimony and, if called as a witness, could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 4/19/2010

Signed: Belmont Frisbee

At: Ridgecrest, California

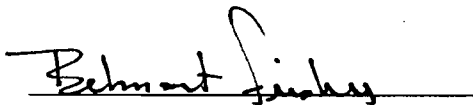
I am a retired Physicist and Electronic Engineer who served more than 38 years for the U.S. Navy in the Ridgecrest and China Lake area of Kern County. I am familiar with the threat of Coccidioidomycosis, commonly called Valley Fever. My wife and my mother both suffered through long bouts of recovery from Valley Fever. In addition, I have two grandchildren with Cystic Fibrosis, who live in Ridgecrest, and I am extremely concerned about the public's safety with respect to the proposed Solar Millennium project.

About 12 years ago the U.S. Navy demolished housing at China Lake, immediately adjoining the community of Ridgecrest. Demolition happened from approximately 1-4 miles from the Ridgecrest town center. During that time period I was in contact with the most senior management at the China Lake facility with respect to public safety. I will introduce that correspondence with this testimony. In addition, I have the Kern County Department of Public Health report on Coccidioidomycosis Morbidity for the five-year period leading up to, and including, the period of Navy housing demolition. It can be seen that for the period 1995 through 1998 there were 14 deaths reported, with 8 of those being in 1998, the year of housing demolition.

It is interesting that the Navy took contractual precautions, including mandating water soaking, as called for by the National Environmental Policy Act, to limit dust exposure from their work. The Coccidioidomycosis spore is extremely small (2-4  $\mu\text{m}$  diameter), far below the PM10 monitoring conducted in dusty regions. It is rather obvious from the morbidity data and from local doctors reporting that there is direct temporal and spatial coincidence between the Navy demolition and a local increase in Valley Fever cases.

I have major concerns that not only is the proposed Solar Millennium work site close to Ridgecrest and huge quantities of soil will be moved, but also that we will see a large increase in the number of Valley Fever cases and the use of water will not be sufficient to control the spores, just as it wasn't in the China Lake demolition above. The known microscopic size of the spore even brings into question the efficacy of dust masks for workers.

Medical laboratory workers working with tissue and blood samples known to contain Coccidioidomycosis spores use a negative pressure (glove box) environment to maintain their safety. This is far above the level of protection planned for the Solar Millennium project.



Belmont Frisbee

April 19, 2010

19 April, 2000

Mr. Frisbee,

I share your concern over Valley Fever and want to provide you with the following feedback on how we control dust while we demolish buildings on the base.

Demolition is done by contract and each contract requires a form of dust suppression during demolition and at the end of the project when the site is finally cleared.

These requirements include: watering the site with a water truck or fire hose to keep dust down during demolition, covering dump trucks with tarps when the debris being hauled is small enough to become airborne, street sweeping to ensure that dirt and debris aren't spread off-site, and the application of a dust suppressant to encapsulate the site after demolition is complete.

My Environmental Projects Office conducted an environmental review of each proposed demolition project before plans and specifications were developed.

Pursuant to the National Environmental Policy Act's procedures, appropriate requirements were developed for dust, asbestos, lead based paint, and hazardous waste requirements. These requirements were incorporated into the plans and specifications for the demolition projects. In addition to controlling dust during demolition, we also have an active dust suppression program for other areas that are prone to dust. One aspect of this program is to take the slabs and chunks of concrete from demolished buildings and crushed them into gravel. This gravel is then spread over dirt roadways to keep down the dust from traffic on those roads.

Additionally, on the 10th of April 2000, we awarded a contract to apply a dust suppressant to various places around base, including the area across the street from the police station that you mentioned in your e-mail.

I hope this answers your concerns regarding dust control during demolition on base and helps explain what the Navy is doing to mitigate its portion of the dust problem in our valley.

Regards,

Capt. John D. Langford  
Commanding Officer  
Naval Air Weapons Station  
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[langfordjd@navair.navy.mil](mailto:langfordjd@navair.navy.mil)

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eMail Transcription

10 May, 2000

Captain,

I really appreciate the personal and rapid response to my concerns and email. Thank you. I've been doing a little research through the Kern County Dept. of Public Health and into their records of Valley Fever incidence in Ridgecrest.

They do maintain records of reported cases by locality that I'll tell you about here.

My point of contact for this data is Kirt Emery, the epidemiologist for the Dept.

A summary of their data follows:

For the years 1995 through 1998 there were 14 cases reported. Of these, 8 were reported in 1998. There were no more than 4 cases in any of the years 1995, 1996 or 1997. This upswing continued into 1999 with another 8 cases reported that year. So far in 2000 there have been 3 cases reported.

A fair question would address changes occurring late in 1997 or early in 1998 to cause this increase in "Cocci Morbidity".

I do believe 1) the Navy should be extremely interested in finding out if they are playing a part in the problem, 2) that military personnel stationed here should have training on this disease and its source and effects, and 3) that this increase and potential connection to the NAWS demolition shouldn't be "advertised" for fear of creating undo panic. I've talked with my doctor about these fears and he agrees that where health issues are concerned a cautious approach is best.

I'm hopeful that a plan of action that addresses my concerns and all of our safety can be instituted soon.

Thanks,

Monte Frisbee

Code 452310D

939-4511

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eMail Transcription

5/10/00

## Kern County Department of Public Health Cocci Morbidity Report

Reporting Weeks: 1 - 54	Cases Reported				Reporting Jurisdiction: Ridgecrest			Indicator Level**	Last Year 1999
	1995	1996	1997	1998	4-Year Total	4-Year AVG.	4-Year S.D.		
Disease	1995	1996	1997	1998	4-Year Total	4-Year AVG.	4-Year S.D.	Indicator Level**	1999
Coccidioidomycosis	<5	<5	<5	8	14	3.5	3.0	9.4	8

\* Not every year has the same number of reporting weeks. For 1998, 1997, 1996, and 1995 there are 52, 53, 52, and 52 reporting weeks, respectively.

\*\*4-Year Average plus 2 standard deviations

Year-to-date for 2000: 3