

California Energy Commission  
Attn: Eric Solorio, Project Manager  
1516 Ninth Street, MS-15 Sacramento CA 95824-5512

Reference: Ridgecrest Solar Power Project (RSPP) (09-AFC-9) Staff Assessment (SA)

**DOCKET**

**09-AFC-9**

DATE

RECD. MAY 10 2010

Dear Sir,

These comments concern the proposed mitigation and perceived significance of the Coccidioidomycosis (Valley Fever) threat as represented in the Worker Safety and Fire Protection C.14-16 section of the SA/DEIS. From my other comments, both written and in the recent public workshop, I assume that this section will be moved to, or referred to, in the Public Health and Safety C.7 section as both the public and construction workers will be at extreme risk.

My first comment directly concerns the underlying assumption that watering of the site and of the addition of other more lasting dust control measures will contain disturbed spores that drift and cause Coccidioidomycosis. The applicant has presented specific construction plans to control and monitor dust during both the construction and operation of the project which appear, at first reading, to be adequate.

Extensive searching through the technical literature, going back to the early 1940s, yields nothing except the oft-repeated statement that the spores are carried along with dust. To the contrary, there is evidence available in the literature that dust control by watering can REDUCE the danger by up to 75%. This is great, but the 25% remaining can kill. There are a number of statements in the literature that the spores, being extremely small (2-4  $\mu\text{m}$  diameter), travel on the wind for distances greater than 100 km and that they can travel with no apparent dust cloud detectable. These documents not only show that the Coccidioidomycosis spore presence in the air from disturbed soil is uncontrollable using the mitigation methods planned, but also explain the Navy's difficulty with Coccidioidomycosis control during the housing demolition mentioned in an earlier comment of mine.

The second comment is a question on the subjective nature of the term "significant." I don't understand how a threshold of significance can be put on the taking of a human life. When a project is undertaken that can be demonstrated to raise the danger to the public from a known threat, it would seem that "significant" isn't a powerful enough word. The danger isn't the same as an unplanned construction accident, but the deliberate subjection of a threat on an unknowing public.

I include here a photo of a black Valley Fever victim, courtesy of Dr. John W. Rippon, not for its gory appearance, but to awaken all concerned to the extreme danger posed by the Valley Fever threat. One can only imagine the suffering and pain this man experienced. When people are fortunate enough not to have outwardly visible lesions, doctors, family and friends often do not realize the horrors that may be happening on the inside of the body.

Valley Fever can cause dangerous inflammation and lesions in virtually any part of the human body. In men it can infect the prostate and testicles, causing removal of the infected organs. If a young woman of childbearing



age has to remain on lifelong antifungal drugs to keep the disease at bay, she may be told she can never have children.

Sincerely,

*Belmont Frisbee*

---

Belmont Frisbee

April 29, 2010