

REQUEST TO SPEAK / SUBMITT PUBLIC COMMENT
Palmdale Hybrid Power Project Hearing

March 2, 2011

Palmdale CA

Name: Jack Ehernberger

Representing: **Self, only!****Remarks Regarding Air Quality and Visual Impacts**

Background: The supporting documentation does not easily show (or does not contain) sufficient detailed meteorological data to illustrate the conditions assessed. It does make the assumption that using an average wind speed for Victorville is a conservative approximation for Palmdale. At a minimum the detail for month, time of day and thermal assumed for low altitudes above the ground should be presented. This would allow comparison with the actual data available for Palmdale and more representative weather observation sites. This commentary is motivated by the cumulative experience of more than 50 years watching the Antelope Valley weather. In my opinion the following remarks are submitted.

Remarks:

1. Victorville experiences air shed from the Cajon Pass. Palmdale receives air via other passes.
2. Environmental impacts are subject to the distribution of wind speeds and their coupling with humidity, temperature and stability. The specifics of these details assumed in the modeling may be significantly different that those prevailing at Palmdale.
3. The assumption of "conservative" with respect to Palmdale is not realistic because adverse impacts may be manifested at both stronger and weaker wind speeds that at the average.
4. Some of the stronger plume scenarios should be described in terms of time of day and plume concentrations, direction and distance. These should represent the strongest, least frequent situations, perhaps the strongest (1-3 hour persistent plumbs) concentrations that will occur less than 0.5% of the time (hours) on a monthly basis and less than 0.01% of the time (hourly) on an annual basis. Without such descriptions the public, civic officials and local industry representatives are not sufficiently educated to form and solidify their opinions regarding plant approval.
5. Conditions calling for mitigation by reduced generation capacity or shut down, whether voluntary or mandatory should be clearly described for the public, sponsors and eventual operators of the plant.
6. Dusty road paving offsets **do not mitigate** either elevated plumb concentrations nor adversely high ambient levels. This is because paving helps reduce particulates most under strong winds. In contrast, many of the threats for adverse impacts due to high plumb concentrations occur under stagnant airflow conditions.