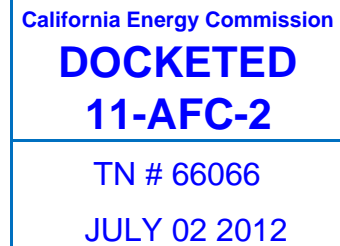


Basin and Range Watch



May 22, 2012

Mike Monasmith

Project Manager

Siting, Transmission and Environmental Protection (STEP) Division

California Energy Commission

1516 Ninth Street, MS-2000

Sacramento, CA 95814

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Subject: Air Quality and Public Health

Dear Mr. Monasmith,

We would like to submit this letter expressing concern over the potential for construction activities relating the proposed BrightSource Hidden Hills Project to impact public health in the region.

Basin and Range Watch is a group of volunteers who live in the deserts of Nevada and California, working to stop the destruction of our desert homeland. Industrial renewable energy companies are seeking to develop millions of acres of unspoiled habitat in our region. Our goal is to identify the problems of energy sprawl and find solutions that will preserve our natural ecosystems and open spaces.

The Hidden Hills Project would disturb thousands of acres and dust will be kicked up by construction activity. It is very difficult to control dust in arid regions, especially in warm months when water evaporates. This is further complicated by the fact that more and more water is usually required to control dust in these regions. The water resources in the region are in over-draft. BrightSource recently stated that they would like to build three more of these projects in the region.

The community of Pahrump, Nevada reported cases of Coccidioidomycosis (Valley Fever) in 2004. As you all know, the disease is spread when spores in soil are transported by blowing dust. Disturbances of soil on a large scale can be the cause of this.

This is documented on the web site for the Pahrump, Nevada Town Board:

<http://www.pahrumpnv.org/pahrump-nevada/documents/agendas-minutes/june-22-2004/#minutes>

"Sally Devlin stated that dust is a federal law and state law. Ms. Devlin said one of the most important thing to know about dust is there are diseases from dust. Pahrump is now invaded with valley fever which is the fungus in dust."

The following three photos show that there is a consistent failure of large solar and wind project developers to control and mitigate the dust emissions that have resulted from the large disturbances caused by recently approved high profile "green" energy projects. In spite of the fact that all three of these developers have promised that dust emissions would not be an issue, we are finding that they are falling short of their mitigation requirements.



Above: Ivanpah Solar Electric Generating System, October, 2010, just after approval



Above: Desert Sunlight Project, January 2012, four months after approval (photo by Donna Charpied)



Above: Ocotillo Wind Express Project, May, 2012, just 5 days after approval (photo by Jim Pelley)

We are worried that industrial construction in the region will compromise the air quality to the point where not only visual resources, but public health will be impacted.

We are also concerned that BrightSource will have no choice but to use more water in an already over-drafted aquifer to control the large disturbance they intend to create.

Construction should not be permitted during days of high winds. Wind speeds of 15 MPH and higher should be determining factors that limit construction. Construction should also be limited during the hottest months of the year. Evaporation rates will be greatest during the months of June, July and August.

It is unfortunate that local communities are getting almost no benefit from these large, recently approved industrial developments. All they seem to be getting are risks to their property values and health. Very few local people are employed by these projects. Approval of the Hidden Hills Project would add the Pahrump/Sandy Valley area to a long list of local communities that are being negatively impacted by fast-tracked industry. The California Energy Commission should deny approval of this project.

Thank you,

Kevin Emmerich

Laura Cunningham

Basin and Range Watch

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