

Appendix 5.1G
Cumulative Impacts Analysis

Cumulative Impacts Analysis

Cumulative air quality impacts from the HHSEGS and other reasonably foreseeable projects will be both regional and localized in nature. Regional air quality impacts are possible for pollutants such as ozone and PM_{2.5} which are formed through photochemical processes that can take hours to occur. Carbon monoxide, NO_x, and SO_x impacts are generally localized in the area in which they are emitted. PM₁₀ can create a local air quality problem in the vicinity of its emission source, but can also be a regional issue when it is formed in the atmosphere from VOC, SO_x, and NO_x.

The cumulative impacts analysis considers the potential for both regional and localized impacts due to emissions from proposed operation of the HHSEGS. Regional impacts are evaluated by comparing maximum daily and annual emissions from the project with emissions of ozone and PM precursors in Inyo County. Localized impacts are evaluated by looking at other local sources of pollutants that are not included in the background air quality data to determine whether these sources in combination with HHSEGS would be expected to cause significant cumulative air quality impacts.

Regional Impacts

Regional impacts are normally evaluated by assessing the project's contribution to regional emissions. Although the relative importance of VOC and NO_x emissions in ozone formation differs from region to region and from day to day, state law requires reductions in emissions of both precursors to reduce overall ozone levels. The change in the sum of emissions of these pollutants, equally weighted, is used to provide a rough estimate of the impact of the project on regional ozone levels. However, because of the rural and relatively undeveloped nature of the project area (southern Inyo County), the GBUAPCD and ARB have determined that ozone concentrations in the area largely reflect the impact of transport from the South Coast Air Basin and the San Joaquin Valley Air Basin.¹ Therefore, in this instance a comparison of project emissions with emissions in the air basin is not particularly informative because regional air quality is not correlated with local or regional sources of emissions. However, this also suggests that the project emissions will have minimal impact on local ozone levels because the majority of ozone in the project area comes from outside the air basin.

A comparison of the emissions of PM₁₀ and PM_{2.5} precursor emissions from the project with regional PM₁₀ and PM_{2.5} precursor emissions can be used to provide an estimate of the impact of the Project on regional PM₁₀ and PM_{2.5} levels. As discussed above, emissions of NO_x and VOC, which are PM₁₀/PM_{2.5} precursors as well as ozone precursors, are relatively low. The majority of regional PM₁₀ and PM_{2.5} comes from directly emitted particulate matter in the form of unpaved road dust and fugitive windblown dust.

¹ CARB, "State Of California Information To Support Nonattainment Area Boundary Recommendations For The 2008 Federal 8-Hour Ozone Standard," Enclosure 3. March 2009.

Table 5.1G-1 summarizes these comparisons. Project emissions are compared with projected regional emissions in 2015. Inyo County emissions projections for 2015 were obtained using CARB's web-based emission inventory projection software.² Emissions from the project would result in very small increases in total emissions in the county. Because of the relatively small emissions contribution from the project and because regional air quality is heavily influenced by transport, we expect that the overall impact of the project on regional air quality will not be significant.

TABLE 5.1G-1

Comparison of Project Emissions to Regional Precursor Emissions in 2015: Annual Basis^a

Ozone Precursors – Annual Basis	
Total Inyo County Ozone Precursors, tons/year	3,423
Total Project Ozone Precursor Emission, tons/year	13.4
Project Emissions as Percentage of Countywide Ozone Precursor Emissions	0.4%
PM₁₀ Precursors – Annual Basis	
Total Inyo County PM ₁₀ Precursors, tons/year	19,272
Total Project PM ₁₀ Precursor Emissions, tons/year	19.5
Project Emissions as Percentage of Countywide PM ₁₀ Precursor Emissions	0.1%
PM_{2.5} Precursors – Annual Basis	
Total Inyo County PM _{2.5} Precursors, tons/year	5,931
Total Project PM _{2.5} Precursor Emissions, tons/year	19.5
Project Emissions as Percentage of Countywide PM _{2.5} Precursor Emissions	0.3%

^a Basin-wide emissions calculated as 365 times daily emissions

Localized Impacts

To evaluate potential cumulative impacts of the project in combination with other projects in the area, we requested from the GBUAPCD, Clark County (NV), and Nevada Department of Air Quality Management, Bureau of Air Pollution Control, information regarding projects within a radius of 10 km (6 miles) of the project.

Within this search area, two types of projects were used as criteria for identification:

- Projects for which air pollution permits to construct have been issued since January 1, 2010; and
- Projects for which air pollution permits to construct have not been issued, but that are reasonably foreseeable.

Existing projects that have been in operation since at least 2010 are reflected in the ambient air quality data that has been used to represent background concentrations; consequently, no further analysis of the emissions from this category of facilities is required. The cumulative impacts analysis adds the modeled impacts of selected facilities to the maximum

² <http://www.arb.ca.gov/app/emsinv/fcemssumcat2009.php>, accessed June 2011.

measured background air quality levels, thus ensuring that these existing projects are taken into account.

Copies of the information requests for information about potential projects are attached. At the time the AFC was being prepared, we had not yet received responses from the Nevada air agencies. The GBUAPCD responded that the only facility in the District meeting these criteria is the St. Therese Mission project. The St. Therese Mission project was required to obtain an Authority to Construct from the GBUAPCD under District Rule 216-A (New Source Review Requirements for Determining Impacts on Air Quality: Secondary Sources). The only potential air emissions identified for that project were fugitive dust from construction, which will be required to be minimized. The certified negative declaration for the project did not identify any potentially significant air quality impacts. Construction of the St. Therese Mission project is expected to be completed before construction begins on the HHSEGS. Therefore, the St. Therese Mission project is not expected to result in any cumulative impacts.

Additional planned development projects that will not involve air permits include the Pahrump Valley General Aviation Airport and the Element Power Solar Project.

The Pahrump Valley General Aviation Airport project site is located approximately 10 miles northwest of the HHSEGS site. The initial phase of the project could be under construction around the same time as the HHSEGS. However, because the project would be 10 miles away and construction impacts tend to be highly localized, it is unlikely to result in any cumulative impacts.

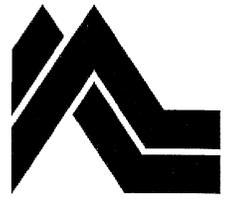
The Element Power Solar Project is being proposed for construction approximately 6 miles north of HHSEGS. Because the project is a photovoltaic project, it is unlikely to have any operational air quality impacts. No information about the construction schedule is available; however, even if the project construction schedule were to coincide with HHSEGS project construction, the localized construction impacts are unlikely to cause any cumulative impacts with HHSEGS.

In the event that Clark County or Nevada DAQM identifies any stationary sources that could contribute to a significant impact, a supplement to this cumulative impacts analysis will be prepared in accordance with Section 3.10 of the modeling protocol (see Appendix 5.1H).

ATTACHMENT 5.1G-1

**Correspondence Related To Cumulative Impacts
Analysis**

May 24, 2011



**sierra
research**

1801 J Street
Sacramento, CA 95811
Tel: (916) 444-6666
Fax: (916) 444-8373

Ann Arbor, MI
Tel: (734) 761-6666
Fax: (734) 761-6755

Mr. Theodore Schade
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, CA 93514-3537

Re: Cumulative Impacts Analysis
BrightSource Energy Hidden Hills Ranch Solar Electric Generating Station

Dear Mr. Schade:

BrightSource Energy (BSE) will be submitting an application for a Determination of Compliance to the District and an Application for Certification to the California Energy Commission for the Hidden Hills Ranch Solar Electric Generating Station (HHR SEGS) in July of this year. BSE is proposing to construct a 500 MW solar thermal power plant in southern Inyo County between Tecopa and the state line. A map showing the location of the proposed project is attached. As part of the project review, the CEC requires BSE to prepare an analysis of the project's cumulative air quality impacts. This is defined by the CEC as "a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary source emissions sources **within a six-mile radius** which have received construction permits but are not yet operating, or are in the permitting process." [Emphasis added.] We have interpreted this as follows:

- Projects for which permits to construct have been issued since January 1, 2010; and
- Projects for which permits to construct have not been issued, but are reasonably foreseeable.

We would like to obtain from the District a list of projects within six miles of the new power plant location for which permits to construct have been issued since January 1, 2010, and for which permits to construct have not been issued, but are reasonably foreseeable, along with sufficient emissions information and stack parameters so that we can include these sources in our air quality modeling. Facilities that meet these criteria but emit only VOCs can be excluded.

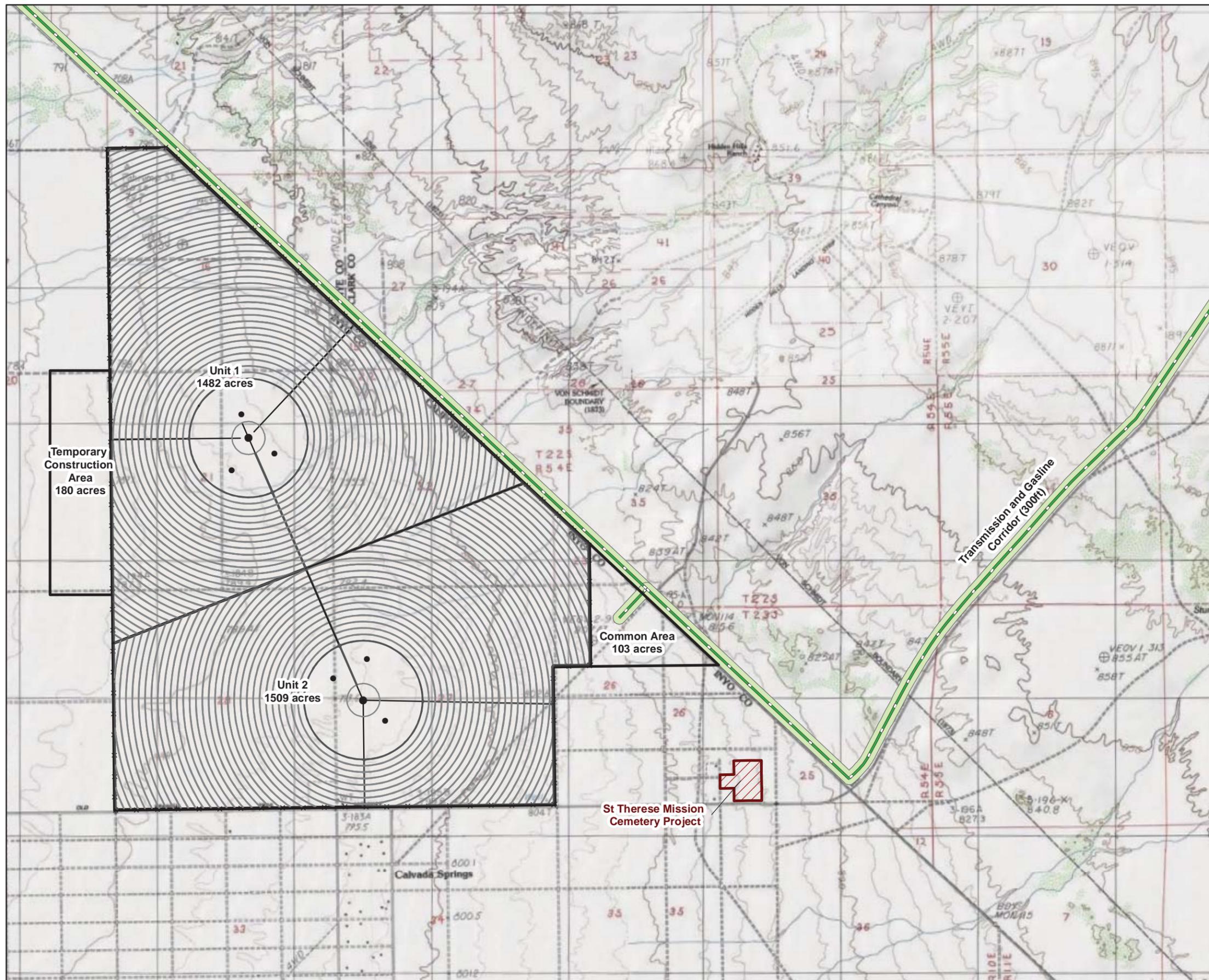
Thank you very much for your assistance. If you have any questions regarding the information we are requesting, feel free to call.

Sincerely,


Nancy Matthews

Attachment

cc: Clay Jensen, BrightSource Energy
Susan Strachan, Strachan Consulting



- LEGEND
- Solar Towers
 - Solar Field Points
 - ××× Project Site Fence
 - Solar Field Paths
 - Access Roads
 - Survey Corridor (300ft)
 - Survey Corridor (300ft)
 - ▨ St Therese Mission Cemetery Project
 - ▭ Project Boundary

Notes:
1. Area of interest subject to change.

DRAFT

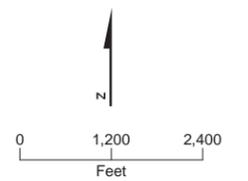


Figure 1
Hidden Hills Site and Proposed Transmission Lines
Hidden Hills

Nancy L. Matthews

From: Jan Sudomier <Jan@gbuapcd.org>
Sent: Thursday, June 09, 2011 8:35 AM
To: Nancy L. Matthews
Subject: RE: BrightSource Energy Hidden Hills Ranch-- cumulative impacts information

There are no facilities in the District, other than the St. Therese project, within 6 miles of the perimeter of the Hidden Hills Ranch project

From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]
Sent: Wednesday, June 08, 2011 5:09 PM
To: Jan Sudomier
Cc: Nancy L. Matthews
Subject: FW: BrightSource Energy Hidden Hills Ranch-- cumulative impacts information

Jan-- Were you able to determine whether there are any sources (other than St Therese) in the District that would meet these criteria?

Thank you--

Nancy

From: Ted Schade [mailto:tschade@gbuapcd.org]
Sent: Tuesday, May 24, 2011 4:21 PM
To: Nancy L. Matthews
Subject: Re: BrightSource Energy Hidden Hills Ranch-- cumulative impacts information

Duane - please assist. I would imagine we have no cumulative sources in this area.

Ted

On May 24, 2011, at 4:00 PM, "Nancy L. Matthews" <NMatthews@sierraresearch.com> wrote:

Hello, Ted—

Attached please find a request for information regarding potential sources of emissions in the vicinity of BrightSource Energy's proposed Hidden Hills Ranch solar power plant project site. If you have any questions regarding this information request, please feel free to call.

Thank you for your assistance--

Nancy Matthews

Sierra Research

1801 J Street

Sacramento, CA 95811

nmatthews@sierraresearch.com

916-273-5124 (direct)

916-444-6666 (main)

916-444-8373 (fax)

<GBV cumulative info 052411.pdf>

June 2, 2011

Mr. Larry Kennedy
State of Nevada, Division of Environmental Protection
Bureau of Air Pollution Control
901 So. Stewart St., Suite 4001
Carson City, NV 89701

Re: Cumulative Impacts Analysis
BrightSource Energy Hidden Hills Solar Electric Generating Facility



**sierra
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Fax: (734) 761-6755

Dear Mr. Kennedy:

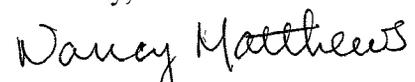
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- Projects for which permits to construct have been issued since January 1, 2010; and
- Projects for which permits to construct have not been issued, but are reasonably foreseeable.

We would like to obtain from BAPC a list of projects within your jurisdiction located within six miles of the new power plant location for which permits to construct have been issued since January 1, 2010, and for which permits to construct have not been issued, but are reasonably foreseeable, along with sufficient emissions information and stack parameters so that we can include these sources in our air quality modeling. Facilities that meet these criteria but emit only VOCs can be excluded.

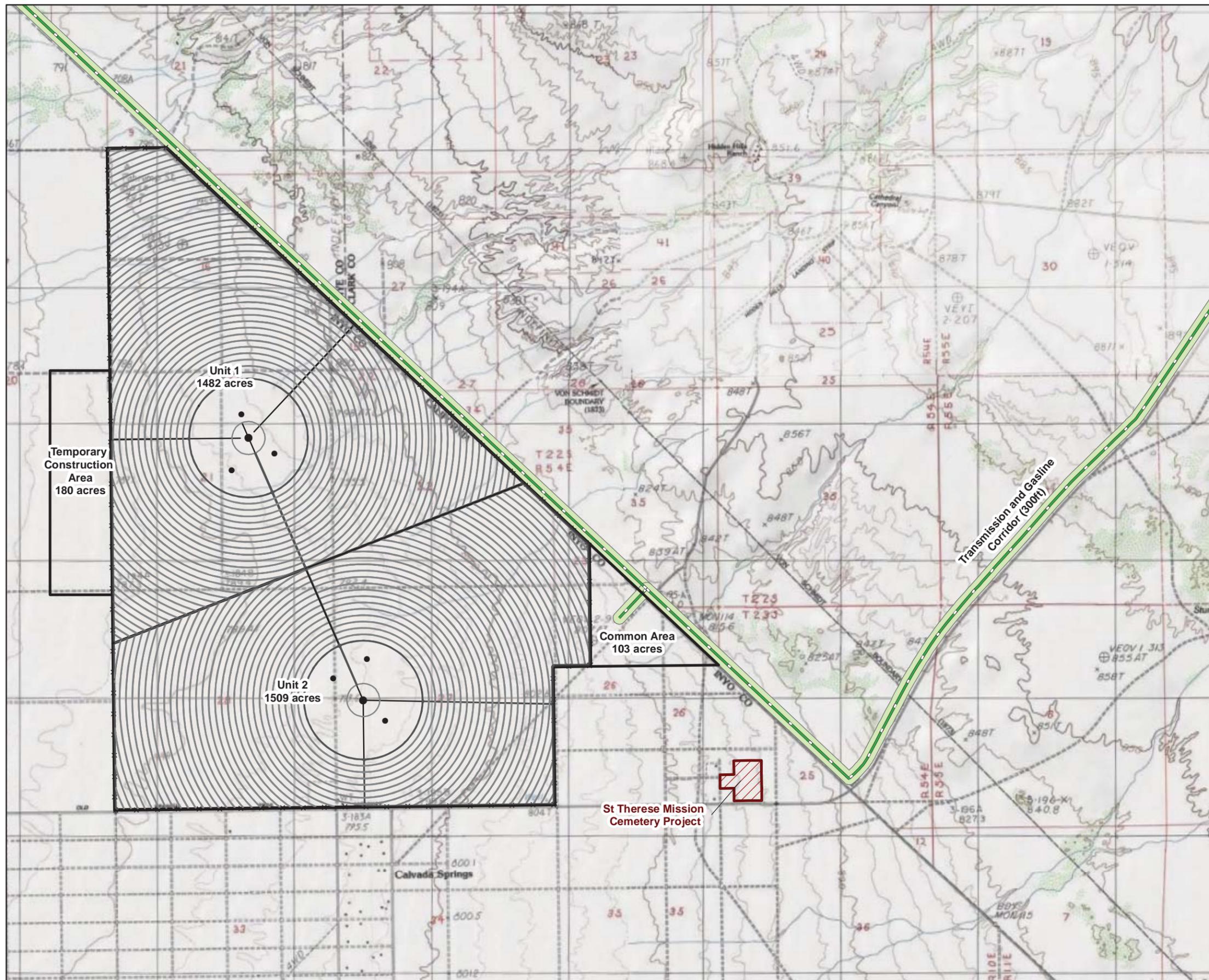
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cc: Clay Jensen, BrightSource Energy
Susan Strachan, Strachan Consulting
Jan Sudomier, GBUAPCD



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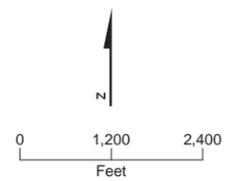


Figure 1
 Hidden Hills Site and Proposed Transmission Lines
 Hidden Hills

Nancy L. Matthews

From: larry kennedy <lakenned@ndep.nv.gov>
Sent: Monday, July 11, 2011 9:24 AM
To: Nancy L. Matthews; Jan Sudomier
Subject: RE: Pahrump Area Query - solar thermal project in Inyo Co
Attachments: Sierra Research Query.xlsx; solar thermal project for southern Inyo County, CA

Jan & Nancy, pls let us know if you have any questions. Unfortunately we're having some issues with our GIS & couldn't do a simply geographic query.

Larry

From: Patrick Anderson
Sent: Tuesday, July 05, 2011 11:26 AM
To: 'nmatthews@sierraresearch.com'
Cc: larry kennedy
Subject: Pahrump Area Query - solar thermal project

Attached is a list of active permits in the Pahrump Valley Hydrographic Basin #162. If any of these interest you in greater detail, let me know and I will attempt to answer your questions. For clarification, a SAD is a Surface Area Disturbance permit for dust control; a Class 2 is a stationary minor source; and a Class 3 is a stationary minor source subject to a facility-wide 5 tpy cumulative emissions cap for all pollutants. Hope this helps – good luck!

Sierra Research Query-- Nye Co response

FIN	Fac. Seq.	Company Name	Issue Date	Class	Facility ID	Facility Name	Basin	Section	Township	North/South	Range	County
A0475	0519	WULFENSTEIN CONSTRUCTION CO, INC	7/9/06	2	AP16110519.02	CLASS 2 - BLM PIT	162	29	20	S	54E	NY
A0181	0890	JOE'S HAULING, LLC	7/7/09	2	AP14420890.02	SAD -AVE OF THE STARS & SR160, PAHRUMP	162	35	19	S	53E	NY
A0205	0923	WULFCO, LLC	1/26/10	2	AP16290923.02	SAD - WULFENSTEIN COMM. DEV PROJECT	162	33	20	S	54E	NY
A0216	1085	WULFENSTEIN CONSTRUCTION CO, INC	1/20/11	2	AP16291085.02	SAD -BLM PIT, 3 MI. S. OF PAHRUMP	162	29	20	S	54E	NY
A0098	1094	ERLANDSON TRANSPORTATION, INC.	7/20/06	3	AP14421094.01	CLASS 3	162	29	20	S	54E	NY
A0226	1135	NYE CTY DEPT OF PUBLIC WORKS	8/23/06	2	AP49531135.01	SAD -PAHRUMP LANDFILL	162	02	20	S	53E	NY
A0235	1171	WULFENSTEIN CONSTRUCTION CO, INC	12/21/06	2	AP14421171.01	SAD -INDUSTRIAL PIT	162	24	20	S	53E	NY
A0236	1172	WULFENSTEIN CONSTRUCTION CO, INC	12/21/06	2	AP14421172.01	SAD -NORTH PAHRUMP PIT	162	05	19	S	53E	NY
A0237	1173	WULFENSTEIN CONSTRUCTION CO, INC	12/21/06	2	AP14421173.01	SAD -BELL VISTA PIT	162	25	19	S	53E	NY
A0238	1174	WULFENSTEIN CONSTRUCTION CO, INC	12/21/06	2	AP14421174.01	SAD -GAMEBIRD PIT	162	03	21	S	54E	NY
A0240	1180	NYE CTY. DEPT. OF PUBLIC WORKS	1/31/07	2	AP16291180.01	SAD -BASIN PIT	162	18	20	S	54E	NY
A0241	1181	NYE CTY. DEPT. OF PUBLIC WORKS	1/31/07	2	AP16291181.01	SAD -WHEELER PASS PIT	162	28	20	S	54E	NY
A0249	1213	WULFENSTEIN CONSTRUCTION CO, INC	5/21/07	2	AP16291213.01	SAD -CHARLESTON RV PARK	162	24	20	S	53E	NY
A0264	1256	MOUNTAIN FALLS, LLC	10/31/07	2	AP16291256.01	SAD -MOUNTAIN FALLS, PAHRUMP	162	03	21	S	54E	NY
A0123	1355	SILVER STATE MATERIALS, LLC	10/9/08	3	AP16111355	CLASS 3 - DBA CALPORTLAND COMPANY	162	13	20	S	53E	NY
A0442	1408	WULFENSTEIN CONSTRUCTION CO, INC.	5/18/09	2	AP14421408.01	CLASS 2 - GAMEBIRD PIT	162	03	21	S	54E	NY
A0325	1484	PLEASANTON VALLEY, LLC	12/1/09	2	AP16291484.01	SAD -RICHLAND ESTATES, PAHRUMP	162	15	19	S	53E	NY
A0111	1501	PAHRUMP VALLEY GRAVEL	1/27/10	3	AP14421501.01	CLASS 3 - MESQUITE PIT	162	02	20	S	53E	NY
A0333	1510	BEAZER HOMES NEVADA	2/25/10	2	AP16291510.01	SAD - BURSON RANCH DEVELOPMENT	162	07	21	S	54E	NY
A0250	1553	WULFENSTEIN CONSTRUCTION COMPANY, INC.	10/17/10	2	AP14421553.01	CLASS 2 - WHEELER PIT, PAHRUMP	162	13	20	S	53E	NY
A0725	2182	WF DEVELOPMENT, LLC	7/19/06	2	AP16292182	SAD - PARADISO VILLAS @ MOUNTAIN FALLS	162	04	21	S	54E	NY
A0853	2355	WULFENSTEIN CONSTRUCTION	8/23/07	3	AP32732355	CLASS 3 - BASIN AVE. & PANORAMA ROAD	162	11	20	S	53E	NY
A0121	2466	SERVICE ROCK PRODUCTS	7/8/08	3	AP16112466	CLASS 3	162	12	20	S	53E	NY
A0965	2491	AWESOME CONSTRUCTION, LLC	9/12/08	2	AP16292491	SAD	162	29	20	S	54E	NY
A0109	2547	NEVADA QUALITY ROCK	8/5/09	3	AP14422547	CLASS 3	162	02	20	S	53E	NY
A1023	2562	VERIZON WIRELESS LLC	6/18/09	3	AP48122562	CLASS 3 - PAHRUMP CELL SITE	162	33	20	S	53E	NY
A1080	2635	ALBERTSON AND SONS SAND & GRAVEL	1/8/10	2	AP14422635	SAD	162	29	20	S	54E	NY
A0446	2695	SOUTHSIDE SAND & GRAVEL	7/8/10	3	AP14422695	CLASS 3	162	28	20	S	54E	NY
A1131	2700	MORALES CONSTRUCTION INC	8/26/10	2	AP14422700	CLASS 2 - MORALES GRAVEL PIT	162	29	20	S	54E	NY
A0116	2718	FLOYD'S CONSTRUCTION, INC.	9/8/10	3	AP14422718	CLASS 3 - SHAMROCK PIT	162	11	20	S	53E	NY
A1182	2730	AFFORDABLE CONCEPTS, INC.	9/9/10	2	AP15422730	SAD - MANSE ELEMENTARY SCHOOL	162	21	19	S	53E	NY
A1187	2736	FREHNER CONSTRUCTION CO.	9/12/10	2	AP16112736	SAD - GAMEBIRD ROAD	162	01	21	S	53E	NY
A1193	2748	NYE COUNTY EMERGENCY SERVICES	10/19/10	2	AP16292748	SAD - M.P. TRAINING SITE	162	01	20	S	53E	NY
A1202	2759	CORE CONSTRUCTION SERVICES OF NEVADA INC	11/23/10	2	AP15422759	SAD - PAHRUMP VALLEY H.S. PROJECT	162	22	20	S	53E	NY
		SAD is a Surface Area Disturbance permit for dust control										
		Class 2 is a stationary minor source										
		Class 3 is a stationary minor source subject to a facility-wide 5 tpy cumulative emissions cap for all pollutant:										

Nye County Facilities Evaluated for Potential Cumulative Impacts

1. Sort by issue date ; eliminate any issued before 1/1/2010
2. Eliminate all Class 3 permits as emissions are below the 5 tpy threshold
3. Use Earthpoint Township/Range/Section overlay on Google Earth and Google Earth measuring tool to determine distances between facility location and HHSEGS property boundary. Nearest facilities to HHSEGS are in Township 21. Distances to those two facilities (Beazer Homes Nevada and Frehner Construction Co) are 8.7 and 10.0 miles, respectively—over 6 miles from property boundary. Since all other facilities are farther away, none of the listed facilities is within the 6 mile criterion for further evaluation.

Cum Impact Sources-- Nye Co response

FIN	Fac. Seq.	Company Name	Issue Date	Class	Facility ID	Facility Name	Basin	Section	Township	North/South	Range	County	Distance to HHSEGS Boundary (mi)
A0216	1085	WULFENSTEIN CONSTRUCTION CO. INC	1/20/11	2	AP16291085.02	SAD -BLM PIT. 3 MI. S. OF PAHRUMP	162	29	20	S	54E	NY	
A1202	2759	CORE CONSTRUCTION SERVICES OF NEVADA INC	11/23/10	2	AP15422759	SAD - PAHRUMP VALLEY H.S. PROJECT	162	22	20	S	53E	NY	
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A1187	2736	FREHNER CONSTRUCTION CO.	9/12/10	2	AP16112736	SAD - GAMEBIRD ROAD	162	01	21	S	53E	NY	9.96
A1182	2730	AFFORDABLE CONCEPTS, INC.	9/9/10	2	AP15422730	SAD - MANSE ELEMENTARY SCHOOL	162	21	19	S	53E	NY	
A0116	2718	FLOYD'S CONSTRUCTION, INC.	9/8/10	3	AP14422718	CLASS 3 - SHAMROCK PIT	162	11	20	S	53E	NY	
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June 2, 2011

Mr. Lewis Wallenmeyer, Director
Clark County Department of Air Quality and Environmental Management
500 S Grand Central Pkwy.
Las Vegas, NV 89155-5210

Re: Cumulative Impacts Analysis
BrightSource Energy Hidden Hills Solar Electric Generating Facility



**sierra
research**

1801 J Street
Sacramento, CA 95811
Tel: (916) 444-6666
Fax: (916) 444-8373

Ann Arbor, MI
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Dear Mr. Wallenmeyer:

BrightSource Energy (BSE) is proposing to construct a 500 MW solar thermal power plant in southern Inyo County, California, along the California-Nevada state line. A map showing the location of the proposed project is attached. BSE will be submitting an application for a Determination of Compliance to the Great Basin Unified Air Pollution Control District and an Application for Certification to the California Energy Commission for the Hidden Hills Solar Electric Generation Facility in July of this year. As part of the project review, the CEC requires BSE to prepare an analysis of the project's cumulative air quality impacts. This is defined by the CEC as "a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary source emissions sources **within a six-mile radius which have received construction permits but are not yet operating, or are in the permitting process.**" [Emphasis added.] We have interpreted this as follows:

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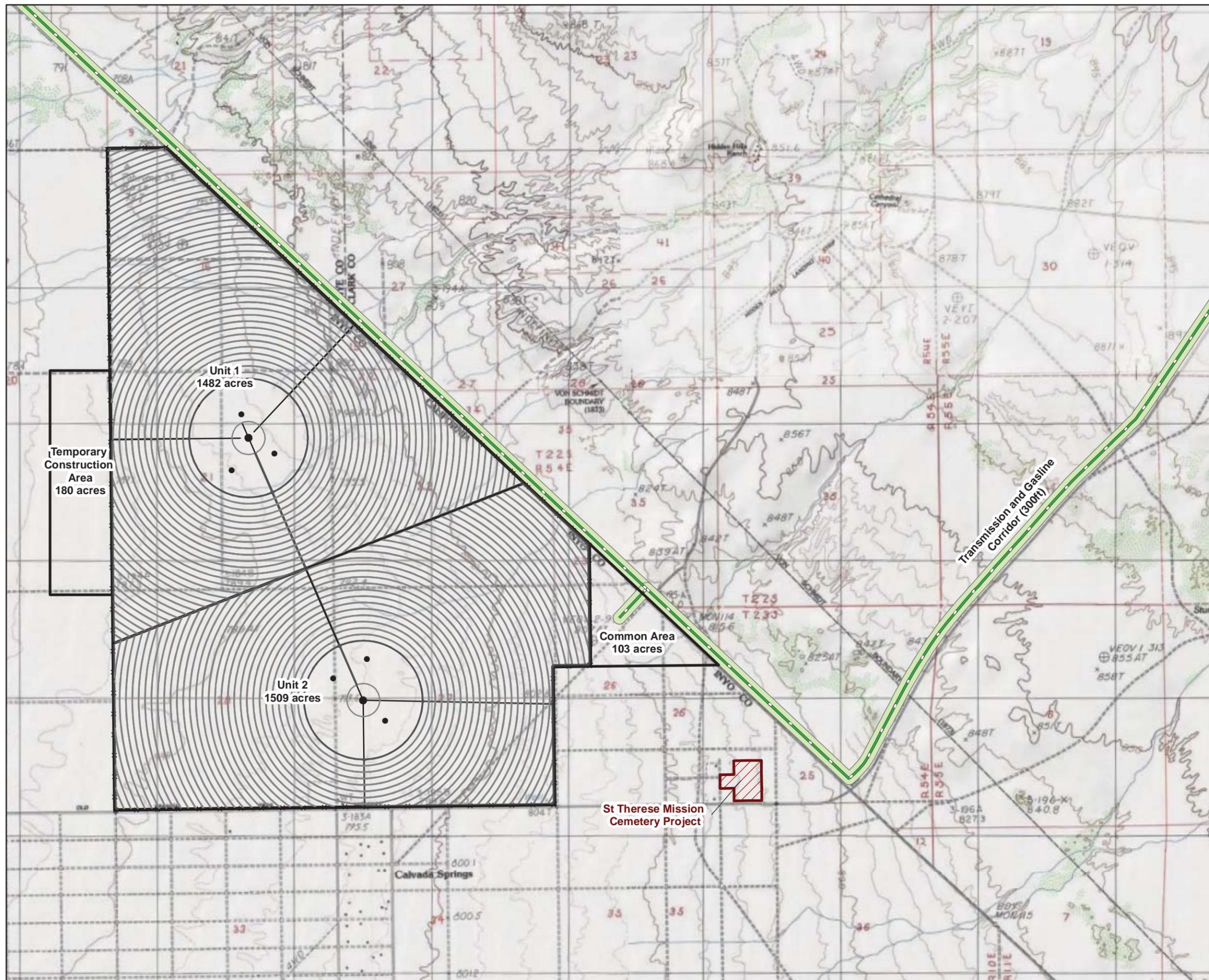
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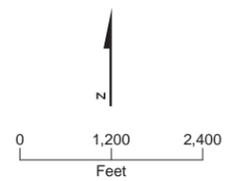


Figure 1
 Hidden Hills Site and Proposed Transmission Lines
 Hidden Hills

Nancy L. Matthews

From: Lewis Wallenmeyer <Wallenmeyer@ClarkCountyNV.gov>
Sent: Thursday, June 02, 2011 11:25 AM
To: Nancy L. Matthews
Cc: Jan Sudomier; Tina Gingras; Dennis Ransel; Richard Beckstead
Subject: RE: solar thermal project for southern Inyo County, CA

Thank you for your letter. We will conduct a review and prepare a letter of response to you.

Lewis

Lewis Wallenmeyer

Director
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From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]
Sent: Thursday, June 02, 2011 10:47 AM
To: Lewis Wallenmeyer
Cc: Nancy L. Matthews; Jan Sudomier
Subject: solar thermal project for southern Inyo County, CA

Dear Mr. Wallenmeyer—

As Jan Sudomier of the Great Basin Unified APCD indicated last week, a solar project is proposed for development in the Charleston View / Calvada Springs area in the south east corner of Inyo County (near Pahrump). Attached is a letter requesting information regarding other development in the project area.

Thank you very much for your assistance. If you have any questions regarding the information we are requesting, please do not hesitate to call or email me.

Nancy Matthews
916-273-5124