



California Clean Energy Fund



Governor Arnold Schwarzenegger  
State Capitol  
Sacramento, CA 95814

Hon. Kenneth L. Salazar  
Secretary of the Interior  
1849 C Street, NW  
Washington, DC 20240

<b>DOCKET</b>	
<b>07-AFC-5</b>	
DATE	<u>05/26/10</u>
RECD.	<u>05/28/10</u>

May 26, 2010

Re: Ivanpah Solar Electric Generating System  
(07-AFC-5; CEC-700-2008-013-FSA/DEIS DES-09-46)

Dear Governor Schwarzenegger and Secretary Salazar,

I am writing to recommend that the California Energy Commission (“CEC”) and the U.S. Bureau of Land Management (“BLM”) approve BrightSource Energy’s Ivanpah Solar Electric Generating System (“ISEGs”). This letter reflects the views and opinions of the leadership of the California Clean Energy Fund (CalCEF), and not necessarily those of its Board of Directors, several of whom hold positions of regulatory influence in regards to the project. CalCEF is a nonprofit, evergreen investment vehicle supporting clean energy technology development and deployment. Via its partnerships with private-sector venture capital firms, CalCEF has investments in a broad range of clean energy technologies, including BrightSource.

This project is a vital step in building the clean energy infrastructure for the nation that is needed to combat global warming, reduce criteria air emissions and lessen our dependence on the foreign and other fossil fuels that have caused such great harm to the environment. It will also bring desperately-needed green jobs to one of the most economically-blighted areas of the country, providing training and green job experience that will help sustain the local economy for years to come. The mitigated project design BrightSource proposed in February 2010 strikes an appropriate balance, providing a strongly positive net environmental benefit while minimizing any negative impacts, and we urge you to approve that design for the project.

Climate change poses the single greatest threat of our age; to respond to this threat, we must displace conventional energy with renewable energy at scale. The challenge ahead is daunting; the energy sector’s contribution to stabilizing atmospheric CO<sub>2</sub> at 450 parts per million (ppm) requires global installation of 15,000 gigawatts of new renewable energy by 2050. Distributed renewable generation will be helpful, but cannot begin to meet this challenge alone. BrightSource’s Ivanpah project will produce more solar energy than all of the rooftop solar installed in the nation in 2008, and will nearly double the nation’s solar thermal energy output. It will avoid more than 13 million tons of CO<sub>2</sub> emissions over its 30-year lifecycle and improve regional and local environmental quality by significantly avoiding pollutants caused by fossil fuel extraction, processing and combustion.



California Clean Energy Fund



BrightSource Energy's Ivanpah project is also setting a high bar in environmental design. The company has made extensive efforts to avoid and reduce its environmental impact. BrightSource's high-efficiency and high-reliability technology makes the most of the land, and its use of dry-cooling significantly reduces water use. The project also employs a low-impact design, which minimizes the use of grading, concrete pads, and materials (including hazardous substances) relative to competing solar technologies. Ivanpah's construction plan leaves natural contours and much of the existing vegetation within the site perimeter in place, and restores disturbed areas not needed for equipment and operation after construction is complete. Its operations, relying on closed-loop water recycling and an exemplary minimum herbicide plan, continue this commitment to the environment. Last, a restoration plan will complete the plant's life-cycle in an environmentally-appropriate manner.

Concerns have been raised regarding the location of the site, particularly with respect to desert tortoise habitat. We strongly support robust mitigation measures to ensure that there is a net benefit to desert tortoise, and that the overall environmental impact of this project is positive. With robust mitigation efforts in place, we feel that on balance, the benefits of this project far outweigh any negative impacts. It is very important that we do not delay the critically-important progress of renewable energy, which is needed to protect the broader desert and its species from the devastating effects of climate change. It is equally important that the lessons learned- not just in siting and environmental assessment, but in best construction and operation practices- are captured so that the progress of renewable energy is accompanied by continuous environmental improvement in all of its aspects. We are dedicated to helping ensure that the net benefit of renewable energy increases through reduction in negative environmental impacts to the minimum necessary.

BrightSource's Ivanpah project represents a key milestone for the nation's renewable energy future. The BLM and CEC's approval of the ISEGS project will illustrate the importance of this and similar projects to meeting the climate change challenge. It will also signal that we can and will achieve our renewable energy goals in an environmentally responsible manner, while reinvigorating local economies and providing green, sustainable jobs. We urge you to promptly approve this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Adler", with a long horizontal flourish extending to the right.

Dan Adler, President

California Clean Energy Fund



California Clean Energy Fund



Cc: John Kessler  
Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[jkessler@energy.state.ca.us](mailto:jkessler@energy.state.ca.us)

George Meckfessel  
Planning and Environmental Coordinator  
Bureau of Land Management,  
Needles Field Office  
1303 South U.S. Highway 95  
Needles, CA 92363  
[ca690@ca.blm.gov](mailto:ca690@ca.blm.gov)