

**From:** Eric Solorio  
**To:** Docket Optical System  
**Date:** 1/14/2010 9:43 PM  
**Subject:** Fwd: Ridgecrest Solar Power Project  
**Attachments:** DeMayCommentsToCEC.rtf

<b>DOCKET</b>	
<b>09-AFC-9</b>	
DATE	JAN 14 2010
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>>> Annette DeMay <[annette@demayfamily.net](mailto:annette@demayfamily.net)> 1/14/2010 9:42 PM >>>

> DATE 14 January 2010

>

> FROM Annette F. DeMay

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>

> TO Eric K. Solorio, Project Manager, California Energy Commission, Siting,

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>

> SUBJECT Water management comments about proposed Ridgecrest Solar Power

> Project's

> Application for Certification (09-AFC-9)—Solar Millennium

>

> I live in the Kern County between Ridgecrest and the proposed site for the

> Solar Millennium (SM) power plant. I've become one of the citizens who is

> more knowledgeable about the status of water in/under the Indian Wells Valley

> (IWV). I'm a fan of solar energy; my husband and I have two photovoltaic

> arrays. I also appreciate SM's intent to use a relatively low water use

> method. But...

>

> My comments stem from concern about the overdraft of the aquifer

> underlying IWV, particularly in the Southwest Field, which in part underlies

> the proposed SM site.

>

> The IWV groundwater has been in measured overdraft for 50 years.

> Currently, 3 to 4 times as many acre-ft are withdrawn per year than are

> recharged, varying some by the area of the valley. 30,000 aft withdrawn

> annually but only 10,000 aft (7,000 8,000 recently) are recharged.

>

> What seems like low water use in other contexts is not insignificant in

> the IWV. SM proposes using a maximum of 165 aft per operational year, per

> memorandum of understanding (MOU) with the IWV Water District; but consider

> the following context. Typical numbers for Ridgecrest:

> 0.64 aft / yr = Ave annual use per

> household, per IWV Water District staff

> 25,000 people = Usual estimate of Ridgecrest

> population

> 2.5 people / household = Typical estimate

> ⇒ 6,400 aft / yr = Ridgecrest estimated total annual

> household water usage

> ⇒ 260 = 165 aft / 0.64 aft = Number of average households equivalent

> to SM operational use

>

> 260 is a large percentage of households above the Southwest Field, although a

- > small percentage of typical Ridgecrest.
- >
- > During SM's construction phase, the MOU allows up to 1,500 aft / yr.
- > This represents 2,340 average households, loosely equivalent to 1/3 of
- > Ridgecrest.
- > During the workshop on 05 January 2010, Tom Mulvihill, General Manager of IWV
- > Water District mentioned that SM has requested use of up to 6,000 aft/yr
- > during construction since the MOU was approved. This is loosely equivalent to
- > all of Ridgecrest household use.
- >
- > Consider the following about the IWV aquifer and its Southwest Field:
- > ? While the aquifer under IWV is generally viewed as one entity, it
- > actually consists of a collection of loosely associated, and sometime
- > separated, "bowls" or "fields."
- > ? Unlike wells in other fields under IWV, the Southwest Field still
- > contains potable water of good enough quality that it does not require
- > filtering for brackish or arsenic or dissolved-solids content.
- > ? The level of the water table in this area is already dropping a measured
- > 4 ft / yr during the past 2 years (along Strecker St.), which has increased
- > from 2 ft / yr in the prior few years.
- >
- > REQUEST CONDITION OF CERTIFICATION. Because of these facts, the BLM—with
- > its overlying water right as landowner of the proposed SM site—must ensure as
- > a legal "condition of certification" that no wells are drilled into the
- > Southwest Field of the aquifer, and that no water to support construction and
- > operation of the SM plant or any other solar plant be taken from the Southwest
- > Field. Rather, water will only be piped in or transported from other areas,
- > from which water may need filtering for brackish nature and/or arsenic and/or
- > dissolved solids.
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- > This condition is essential, in addition to other mitigations. Thank you
- > for considering this important matter.
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- > Sincerely,
- > Annette F. DeMay