INDIAN WELLS VALLEY WATER DISTRICT

January 5, 2010

California Energy Resources Conservation and Development Commission
Bureau of Land Management
Solar Millennium, LLC: Ridgecrest Solar Power Project
Environmental Scoping Meeting: Ridgecrest, California

Good Evening:

On behalf of Indian Wells Water Valley District, I wish to express our appreciation to you and your staff for hosting the scoping meeting for the Environmental Impact Study regarding the proposed Ridgecrest Solar Power Project.

Solar thermal power plants generate electricity by the focusing sunlight to heat a medium to high temperatures and drive a steam turbine. Solar thermal power plants have the option of using either wet cooling technology or dry cooling technology.

A solar thermal power plant with wet cooling towers uses a very significant amount of water. Dry cooling technology uses air for cooling and consumes up to 95 percent less water than wet cooling. Some water is still consumed in the wash down of mirrors and maintenance of the plant. The success and economic feasibility of dry cooling for solar thermal power has been demonstrated in California and elsewhere.

In the Indian Wells Valley, the amount of water consumed is critical. Our aquifer is a limited resource and groundwater is being withdrawn faster than it is being recharged. We understand from recent studies that we are currently using the best water available in the Valley and that in the not-too-distant future we will be dependent on the use of brackish water, which is also a finite supply. It is not responsible to think of this Valley's brackish water or even its waste water treatment effluent as being expendable. At this time, the Valley has not secured any outside source of supply.

For this reason, the District has objected strenuously to Solar Millennium's earlier proposal to use wet cooling. The District met on several occasions with Solar Millennium representatives to discuss dry cooling as an alternative to efficiently operate a solar thermal power plant. The result of these meetings is an understanding with Solar Millennium that the Ridgecrest Solar Project will use dry cooling technology with mitigation for the water consumed.

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Water is our most vital natural resource. It is the position of Indian Wells Valley Water District that development of one natural resource (solar power) should not come at the expense of another (water). The District Board of Directors has taken the position that it supports solar power with a "zero net effect" on Valley water resources and that those water resources include potable water, brackish water, and waste water treatment effluent. Even the use of waste water effluent is a demand on the Valley water supply because it is a potential source of ground water recharge.

Therefore, the use of water must be identified as a significant environmental impact that must be mitigated by an equal reduction in water use somewhere else within the Valley. A successful mitigation program must achieve measurable results within a reasonable time period. The mitigation program must be based on documented water savings potential from established and respected sources in this field. Actual results must be monitored, reported, and documented.

The District has entered into an agreement with Solar Millennium to supply a maximum amount of 165 acre feet of water per year to the Ridgecrest Solar Project for operations and a maximum amount of 1,500 acre feet for construction. The District expects that mitigation will address all recurring use of water, i.e., 165 acre feet per year. During the recent negotiations for the agreement with Solar Millennium, the District was assured by Solar Millennium that it would mitigate all its water use. The District believes that it has such a commitment from Solar Millennium.

For investors who will profit from solar thermal power, for residents of Southern California cities who will enjoy the power generated in our valley, and for you as stewards of public lands, solar projects do have alternatives that can demonstrate your responsibility to the people of Indian Wells Valley.

Respectfully,

Tom Mulvihill

Tom Mulvihill
General Manager

c: Board of Directors, Indian Wells Valley Water District