



COOPERATIVE WATER
MANAGEMENT GROUP

INDIAN WELLS VALLEY COOPERATIVE WATER MANAGEMENT GROUP

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June 25, 2008

Hector Villalobos, Area Manager
Bureau of Land Management
Ridgecrest Resource Area
300 S. Richmond Road
Ridgecrest, CA 93555

Dear Hector,

The Cooperative Groundwater Management Group is a public water data-sharing group consisting of most of the major water producers, other government agencies, and stakeholders in the Valley formed to coordinate efforts, facilitate joint studies, and avoid duplication of effort.

Through its Technical Advisory Committee, the Groundwater Management Group continually reviews and monitors ongoing efforts to better understand our local water resources. This group is also responsible for an extensive well monitoring program and for several studies that have been conducted to better understand the groundwater resource in the Valley which is complex. Most recently, the Group's Technical Advisory Committee released its final report for a comprehensive groundwater monitoring program funded with assistance of AB303, the Local Groundwater Assistance Program administered by the Department of Water Resources.

The proposed project of Solar Millennium, LLC to construct two solar thermal power plants in the Indian Wells Valley using wet cooling technology has recently come to the Group's attention. After discussing information which has been made available to the community during the recent meetings at the Bureau of Land Management, the Group has taken the position that it opposes the use of water for cooling in solar thermal power plants in the Indian Wells Valley. The Water Management Group considers the use of groundwater from within the Indian Wells Valley for wet cooling to be an issue of serious concern. It is not responsible to think of this Valley's water resources, either fresh or brackish groundwater, or waste water treatment effluent, as being expendable. At this time, the Valley has not secured any outside source of supply.

The Indian Wells Valley community is unique and there are concerns that may not be readily apparent either to a multinational firm or to federal and state regulators. The supply of groundwater is being withdrawn faster than it is being recharged. Recent studies make it clear that we are currently using the best water available in the Valley and that we will be dependent in the not-too-distant future on the use of brackish water which is also a finite supply.

According to Solar Millennium, the proposed project would use approximately 2,500 acre-feet of water per year. Other water consumption estimates for wet cooling cause us to question if Solar Millennium's actual water consumption would be even more than this. On the other hand, dry cooling technologies are now successfully in use. At the BLM meeting, Solar Millennium stated they are aware of and are considering dry cooling for future projects elsewhere. With water supplies being an issue of concern throughout the western United States, it is imperative that dry cooling should be used in the Indian Wells Valley for this project.

While we certainly welcome the development and growth of alternative energy sources as well the economic growth opportunities for the area that they provide, we respectfully request that the Bureau of Land Management require dry cooling technology for any solar thermal project in this Valley. We also request that if the BLM grants the use of land for any solar project, mineral and water rights not be included with that land use.

For the Bureau of Land Management, as stewards of public lands, this project does have alternative technologies that can address your responsibilities to the people of Indian Wells Valley and to the nation as a whole.

Best Regards,



Don Zdeba
Chairperson

Indian Wells Valley Cooperative Water Management Group

C: Mike Pool, State Director, BLM
Steve Borchard, District Director, BLM
Captain Peterson, NAWC, China Lake
Jason Warren, China Lake Environmental Planning
Eileen Allen, California Energy Commission
Jon McQuiston, Supervisor, County of Kern
Chip Holloway, Mayor, City of Ridgecrest
Harvey Rose, City Administrator, City of Ridgecrest