



BIGHORN-DESERT VIEW WATER AGENCY  
A PUBLIC AGENCY

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July 9, 2009

California Energy Commission  
Clare Laufenberg Gallardo  
1516 Ninth Street, MS 46  
Sacramento, CA 95814

Subject: Response to RETI Phase 2A, Public Comment

Dear Ms. Laufenberg:

Thank you for providing an extension to the comment period for public responses to RETI Phase 2A. According to maps provided by the Phase 2 Working Group it appears that a RETI CREZ boundary exists within the Bighorn-Desert View Water Agency service area (see attached map) and this CREZ is associated with solar lease applications along Highway 247 near the community of Johnson Valley.

We are alarmed to discover the CREZ Refinement Matrix is silent regarding water resource availability and impacts related to the development of large scale solar fields. It is our understanding that solar fields require large amounts of water for operation and maintenance and with limited groundwater supplies these projects could be considered unsustainable over time. The Bighorn-Desert View Water Agency service area is not built-out, and some groundwater sub-basins are in overdraft now. In fact, the agency is aggressively pursuing artificial recharge facilities to percolate entitlements from the State Water Project to better manage the local resources into the future.

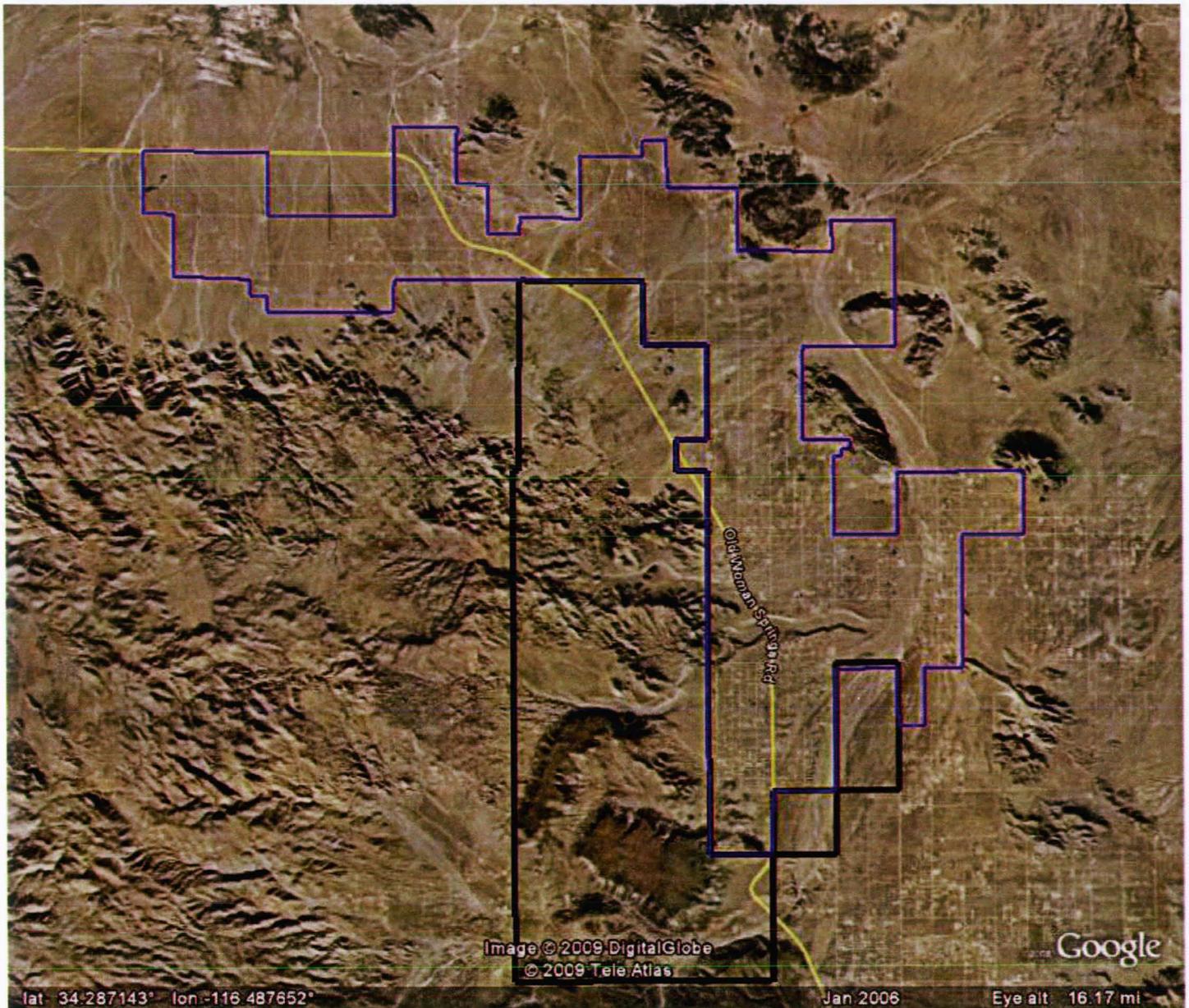
Bighorn-Desert View Water Agency perceives that groundwater resources tapped for large scale solar energy development is not a beneficial use of the public trust resource managed by BDVWA for the citizens of this community. It is simply a trade, green power in exchange for groundwater depletion.

We respectfully request that CREZ 44 be reevaluated in light of the lack of groundwater resources and be dropped from the RETI and off the associated maps.

Sincerely,

A handwritten signature in red ink, appearing to read "Marina D. West", with a stylized flourish extending to the right.

Marina D. West, PG  
General Manager



Bighorn Desert View Water Agency

— Boundaries

— Sphere of Influence boundaries

