The Nature Conservancy
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MEMORANDUM

To: Investor Owned Utilities
Publicly Owned Utilities
Western Area Power Administration
California Publicly Utilities Commission
California Energy Commission

From: Elizabeth O'Donoghue, Director of Infrastructure and Land Use (eodonoghue@tnc.org)
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The Nature Conservancy of California

Date: May 24, 2011

Subject: Support for the Westlands Solar Park

The Nature Conservancy of California encourages the development of the Westlands Solar Park (WSP) master plan which is located in the southern portion of the Westlands Water District on selenium contaminated agricultural farmland. The WSP is a 5,000 MW competitive renewable energy zone that was identified in the Renewable Energy Transmission Initiative phase 2a report.

The Nature Conservancy is a global, non-profit organization dedicated to the conservation of biodiversity. We seek to achieve our mission through science-based planning and implementation of conservation strategies that provide for the needs of people and nature. We strongly support the development of renewable sources of energy to mitigate the increasing threat of climate change. However, if not located, built, and operated responsibly, energy projects can negatively impact biodiversity, harm wildlife and their important habitats, and diminish water resources, especially in fragile desert environments. The Conservancy supports siting renewable energy facilities in locations that have little to no ecological value, are close to economic centers and existing transmission lines, and do not displace productive agriculture and ranching operations.

We have been following the development of the WSP and have found that the WSP is an example of a location that meets many, if not all of these concerns. The WSP is located on selenium contaminated farmland and, while the environmental studies have not been finalized, preliminary results indicate that the project location hosts little to no habitat for state or federally listed species or

species of concern. The solar operations will use significantly less water than is currently used for the agricultural operations. We will continue to follow the environmental review process closely but we are encouraged by the results thus far.

Other key characteristics make WSP well suited for locating large scale solar facilities. For example, the solar resources at the project location are significant, and the site lays in-between two major high voltage transmission lines; thereby enabling an efficient use of corridors for new transmission lines that are necessary for the full build out of the park. The economy of scale of the project will drive down future costs of solar energy. It will bring much needed jobs to the areas of the Central Valley experiencing double digit unemployment. Importantly, harnessing 5,000 MW of energy on the WSP may help reduce pressure to develop more pristine areas of California.

The Nature Conservancy supports utilities in California procuring renewable resources from areas with characteristics like those found in the WSP in order to meet the state's renewable portfolio standard and greenhouse gas reduction goals. The long term benefits are enormous for California communities and ratepayers by encouraging utilities and developers to locate large scale solar on previously disturbed, environmentally contaminated areas that are located near major existing transmission lines and corridors. It is possible to find these areas in California and to generate energy from renewable sources while protecting California's important natural heritage.

Thank you for your consideration. Please feel free to contact us if you have any questions or would like additional information.