

**DOCKETED**

<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	265163
<b>Document Title:</b>	Ileene Anderson Opening Testimony
<b>Description:</b>	N/A
<b>Filer:</b>	Center for Biological Diversity
<b>Organization:</b>	Center for Biological Diversity
<b>Submitter Role:</b>	Intervenor Representative
<b>Submission Date:</b>	7/30/2025 3:03:08 PM
<b>Docketed Date:</b>	7/30/2025

**STATE OF CALIFORNIA**

**State Energy Resources Conservation and  
Development Commission**

In the Matter of:

WILLOW ROCK ENERGY  
STORAGE CENTER

**Docket No. 21-AFC-02**

**TESTIMONY OF ILEENE ANDERSON  
SUBMITTED ON BEHALF OF  
INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY  
FOR WILLOW ROCK ENERGY STORAGE CENTER**

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**TESTIMONY OF ILEENE ANDERSON  
SUBMITTED ON BEHALF OF  
INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY  
FOR WILLOW ROCK ENERGY STORAGE CENTER**

**Re: Impacts to Joshua Tree Woodlands, Western Joshua Trees, and Reservoir  
Issues from the Proposed Willow Rock Energy Storage Center**

**Docket 21-AFC-02**

**Summary of Testimony**

The proposed project will be harmful to western Joshua tree woodlands and the western Joshua tree. The Final Staff Assessment (FSA) fails to adequately identify and evaluate the presence of western Joshua tree woodlands, a sensitive plant community, and does not properly assess the impacts of the proposed project on these woodlands. The FSA also fails to adequately identify and evaluate all individual western Joshua trees in the project area, including along the various gen-tie alignments, and does not adequately evaluate impacts to these individuals. As a result, the FSA fails to adequately avoid, minimize and mitigate the impacts to the western Joshua tree as required under California Environmental Quality Act (CEQA).

I am also concerned about the proposed but not yet finalized Reservoir Management Plan. Despite the FSA outlining the expected components of the Plan, the absence of a complete plan prior to project certification makes it impossible to know if the proposed measures will actually be included, implemented, or effectively prevent significant impacts. In this arid part of California, open water is a major wildlife attractant. As the CEC has seen at other renewable energy sites, such features can result in wildlife mortalities despite efforts to avoid and minimize impacts. Deferring the completion of a Reservoir Management Plan until after certification precludes meaningful evaluation of its efficacy and violates CEQA's prohibition on deferring formulation of mitigation measures.

In summary, I find the FSA to be deficient in three respects: (1) It fails to adequately identify, evaluate, avoid, minimize and mitigate impacts to western Joshua Tree woodlands; (2) It fails to require a complete, pre-construction census of western Joshua trees across the entire project area, including gen-tie alignments; and (3) It improperly defers the development and disclosure of the Reservoir Management Plan. These deficiencies need to be addressed and remedied in a revised Staff Assessment or other environmental document prior to project permitting.

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## **Qualifications**

My qualifications are summarized below and detailed in my resume, which is attached to this testimony as **Exhibit A**.

I have over 30 years of professional experience identifying, surveying, and documenting biological resources in southern California, including the Mojave desert. I have a Master's of Science in Biology and a Bachelor's of Arts in Biology from California State University, Northridge. I have completed continuing education in restoration, revegetation, and reclamation of native habitats at the University of California, Riverside.

Throughout my career, I have directed and participated in numerous field surveys for federally and state-listed threatened and endangered species, as well as other rare and common species. I have authored biological resource reports and environmental analysis in conformance with the California Environmental Quality Act and the National Environmental Policy Act. I have also developed, implemented, and monitored a variety of restoration and revegetation plans, primarily as mitigation for project impacts.

My professional contributions include publishing articles in peer-reviewed scientific journals and presenting research at scientific conferences and meetings. I have provided expert testimony on botanical and wildlife issues before the California State Water Resources Control Board, the California Public Utilities Commission, and the California Energy Commission.

From 1997 to 2002, I served as a two-term federal appointee to the Bureau of Land Management's California Desert Advisory Council, representing renewable resources, including one year as chairperson.

I am currently a Senior Scientist and the California Deserts Director with the Center for Biological Diversity, where I focus on the conservation and management of native natural resource issues primarily in southern California, including the Mojave desert.

## **Statement of Testimony**

I have reviewed the Preliminary Staff Assessment (PSA) (TN 264342) and the Final Staff Assessment (FSA) (TN 264843) for this project. While the FSA reflects some improvements in the analysis and in the proposed Conditions of Certification compared to the PSA, the FSA still fails to address critical biological resource concerns. As further explained below, the FSA fails to address the important distinction between impacts to individual western Joshua trees and impacts to

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existing dense stands of western Joshua trees known as western Joshua tree woodlands. The FSA also fails to identify all western Joshua trees and all areas of Joshua tree woodlands within the project area, including those along the optional gen-tie alignments. In addition, the FSA improperly defers the development and public disclosure of the Reservoir Management Plan.

It is my professional opinion that these shortcomings in the FSA fail to provide adequate data or analysis to satisfy the requirement of CEQA to avoid, minimize and, if necessary, mitigate impacts to western Joshua trees, western Joshua tree woodlands, and other biological resources.

## **I. Western Joshua Tree Woodland**

The FSA correctly acknowledges that sensitive natural communities are defined by the California Department of Fish and Wildlife (“CDFW”) as “communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects.” (FSA 5.2-21.) Sensitive natural communities, ranked S1 to S3, must be addressed in the environmental review process under CEQA and its functional equivalents. (*Id.*; *see also* CEQA Guidelines, App’x G, item IV., b.)

Joshua tree woodland is a sensitive natural community with a state rank of S3 (CDFW 2025 at PDF pg. 30) and is known to occur within the project area. (FSA 5.2-6, 5.2-148.) CEC staff acknowledge that project construction within an optional section of the gen-tie alignment would likely result in permanent impacts to Joshua tree woodlands due to pole foundation placement and from the construction of new access roads, as well as temporary impacts from pole construction and potential pull and tensioning sites. Staff estimate that these impacts could range from 0.5 acres up to 2 acres, depending on the size of the road and the alignment selected. Staff also note that additional areas within the project site—particularly the WRESC site, P1, P2 North, and P2 South—exhibit vegetation characteristics consistent with Joshua tree woodland, although these areas were mapped differently by the applicant. (FSA 5.2-148.)

Because the precise acreage of Joshua tree woodland that would be impacted remains uncertain pending additional surveys, the FSA makes clear that potentially significant impacts to this sensitive natural community are likely. According to the FSA, impacts to Joshua tree woodland would include:

permanent and temporary loss of habitat, the loss or disruption of native seedbanks, or alterations [to] local drainage patterns that result[] in offsite runoff and increased erosion and sedimentation to adjacent habitats. Indirect impacts to native vegetation and Joshua tree

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woodland would include long-term type conversion of desert habitats, long-term alterations to hydrology, and degradation of habitat from non-native invasive weeds.

(FSA 5.2-148.) Additionally, although the acreage of impact may vary, Staff concludes that such variation “would not alter the significance conclusions in the PSA.” (FSA 5.2-238 to 239.) It is my professional opinion that the FSA still fails the CEQA requirements to avoid and minimize impacts by not identifying the location of the pole foundation placement, the construction of new access roads, and the temporary impacts from pole construction and potential pull and tensioning sites along the genties. I believe it is possible to avoid impacts to western Joshua tree woodlands by carefully siting these construction features or, at a minimum, minimize impacts to western Joshua tree woodlands from these construction features. It is unclear to me why the FSA has not done due diligence in identifying where these construction features are proposed to be constructed in relation to woodlands in order to avoid, minimize and, if necessary, mitigate impacts to western Joshua tree woodlands.

With respect to mitigation, CEC staff assert that COC BIO-12—which requires accounting for and mitigation of individual western Joshua trees taken—adequately offsets project impacts to woodlands. (FSA 5.2-224 to 225.) However, BIO-12 is narrowly focused on impacts to individual trees and does not address the broader impacts to the Joshua tree woodland community. This treatment of the western Joshua tree fails to account for the uniqueness and sensitivity that the FSA recognizes for western Joshua tree woodlands. Mitigation for the removal of individual trees cannot substitute for the loss or degradation of a sensitive natural community. CEQA requires that mitigation measures address the actual impact identified, be fully enforceable, and reduce the impacts to a less-than-significant level.

Accordingly, I urge revisions to COC BIO-12 to ensure adequate analysis and mitigation of impacts to Joshua tree woodland. Specifically, BIO-12 should be revised to:

- (1) Require appropriate surveys to delineate the extent of Joshua tree woodland within the project area and appropriate buffers, consistent with the California Native Plant Society’s Manual of California Vegetation (CNPS 2025);
- (2) Include appropriate avoidance and minimization measures specifically targeted at preserving the integrity of woodland communities; and
- (3) Require compensatory mitigation for Joshua tree woodland where avoidance is infeasible.

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## II. Western Joshua Tree

### A. An Updated Western Joshua Tree Census Is Required Before Take Can Be Authorized

Under the Western Joshua Tree Conservation Act (“WJTCA”), take of WJT may only be authorized if statutory conditions are met. One such condition requires the applicant to submit “a census of all western Joshua trees on the project site, including size information and photographs” that categorize trees by CDFW-defined classes. (Fish & Game Code § 1927.3(a)(1).)

As the Center previously noted (TN 264342 at 8–10) and the FSA acknowledges (FSA 5.2-24), the applicant’s existing census data is incomplete, as portions of the project site—including segments of the gen-tie alignment—have not been surveyed for western Joshua trees. CEC staff concur that supplemental surveys for WJTs should be required, and revised BIO-12 accordingly. (FSA 5.2-225.) Staff assert that BIO-12 includes a requirement for updated surveys prior to ground disturbance to account for newly sprouted or previously missed trees. (*Id.*)

However, as currently drafted, BIO-12’s provisions regarding new or missed trees apply only *after* the site has been cleared of the WJTs identified in the applicant’s initial, incomplete census. Specifically, BIO-12 Condition 3 states:

During construction, once the project site has been fully cleared of the WJT identified in the census, if a new western Joshua tree stem or trunk arises from the ground . . . [the] project owner shall prepare a Notification of New Stem or Trunk and submit it to the CPM before conducting or resuming project activities that will impact any WJT individual that was not included in the census and included in the invoice, including any new WJT stem or trunk that arises from the ground ...”

(5.2-291.)

Although BIO-12 Condition 3 addresses missing or new trees, it does so only *after* take of the identified trees in the incomplete census has been authorized. This approach fails to allow for avoidance and minimization of impacts. Absent a complete and accurate pre-construction census of all WJTs within the project area—including all portions of the gen-tie alignment—the statutory requirements of the WJTCA have not been satisfied and take cannot lawfully be authorized.

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A complete WJT census is essential not only to quantify the total number of affected trees, but also to evaluate whether the applicant has avoided and minimized impacts to, and the taking of, each individual WJT to the maximum extent practicable, as required by Fish & Game Code § 1927.3(a)(2). Without this baseline information, CEC staff cannot assess the full scope of the project's impacts on WJT or whether impact reduction measures could be implemented to minimize or avoid those impacts.

Therefore, I urge revisions to COC BIO-12 to include a requirement that the project owner conduct and submit a complete, accurate, site-wide census of all WJTs. This census must cover the entire project area, including all segments of the preferred and alternative gen-tie routes, pull and tensioning sites, new access roads, and the appropriate survey buffer. It must also be submitted before any take is authorized and be consistent with Fish and Game Code § 1927.3(a)(1).

### **B. Impacts Must be Avoided and Minimized to the Maximum Extent Practicable Before Take Can Be Authorized**

The WJTCA, together with the Western Joshua Tree Conservation Plan, establish a clear mitigation hierarchy: avoid, minimize, and then, if necessary, mitigate impacts to WJTs (*See* Fish & Game Code § 1927.3(a); CDFW 2025 at 5-8, 5-9, 6-11). Consistent with this hierarchy, the WJTCA prohibits the authorization of take unless the applicant avoids and minimizes impacts to, and the taking of, each individual WJT to the maximum extent practicable. (*See* Fish & Game Code § 1927.3(a)(2).)

For this Project, feasible avoidance and minimization measures may include, for example:

- Eliminating, redesigning, or relocating the optional aboveground architectural berm to avoid or reduce impacts to the approximately 467 WJTs proposed for permanent removal and 17 proposed for relocation under the “with berm” option, particularly given that the berm has not yet been fully designed (FSA 3-28, 5.2-155);
- Obtaining take authorization to trim, encroach upon, or relocate trees instead of lethally removing them;
- Reconfiguring or relocating non-essential project components, such as laydown/staging and parking areas.

To ensure compliance with Fish & Game Code § 1927.3(a)(2), I urge revisions to COC BIO-12 to incorporate feasible avoidance and minimization measures, as

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listed above. Such measures should be implemented unless the project owner demonstrates, to the satisfaction of the CPM, that they are infeasible.

### **III. Reservoir Management Plan**

COC BIO-7 was revised in the FSA to require submission of a Reservoir Management Plan prior to construction of the reservoir. (FSA 5.2-266 to 267.) While this revision appropriately acknowledges the need for site-specific mitigation and outlines the expected components of the plan, it impermissibly defers formulation of specific mitigation measures until after project certification, in violation of CEQA. (*See* 14 Cal. Code Regs. § 15126.4(a)(1)(B) (“Formulation of mitigation measures shall not be deferred until some future time.”))

In this arid part of California, open water is a major wildlife attractant as the CEC has seen on other renewable energy sites that have resulted in wildlife mortalities despite efforts to avoid and minimize impacts. As CEC staff note, “[e]vaporation ponds are common at industrial facilities, including other CEC jurisdictional facilities, and the strategies to prevent wildlife access and ultimate injury are well understood.” (FSA 5.2-227). Given this established body of knowledge, it is feasible to identify specific, effective mitigation measures prior to certification. Even if some flexibility is necessary, the condition fails to include the specific performance standards required under CEQA to justify any deferral. For example, general language such as “minimize wildlife entrapment” does not provide a clear, enforceable threshold for success or failure, such as zero mortality for sensitive species or a quantitative limit on annual entrapments.

I worry that deferring the analysis of potentially significant impacts and the formulation of mitigation measures until after project certification risks precluding adequate mitigation altogether. Without knowing the design, performance objectives, and contingency triggers of the Reservoir Management Plan, CEC staff and the public cannot meaningfully evaluate whether wildlife impacts have been adequately avoided, minimized, or mitigated—or whether the measures proposed are feasible and effective.

Accordingly, I urge revisions to COC BIO-7 to require that a complete Reservoir Management Plan be developed and publicly disclosed with a public comment period prior to project certification.

### **Conclusion**

Based on my professional review of the PSA and FSA for the proposed Willow Rock Energy Storage Center, it is my opinion that the FSA does not provide an adequate

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evaluation of the project's impacts on western Joshua trees, western Joshua tree woodlands, and those impacts associated with the reservoir. Specifically, the FSA:

1. Fails to identify all individual western Joshua trees and western Joshua tree woodlands within the project site, including all of the optional gen-tie alignments;
2. Fails to ensure that impacts to these sensitive resources are avoided, minimized, and mitigated to the maximum extent practicable, as required by CEQA and the Western Joshua Tree Conservation Act; and
3. Impermissibly defers the development and disclosure of a complete Reservoir Management Plan and its enforceable performance standards, precluding meaningful review and mitigation of potential wildlife impacts.

For these reasons, I recommend that the CEC require a revised Staff Assessment or other supplemental environmental documentation that fully addresses these deficiencies before permitting the project. Such revisions should include:

- A complete and accurate census of all western Joshua trees and delineation of western Joshua tree woodlands;
- Identification and implementation of feasible avoidance and minimization measures for both western Joshua trees and Joshua tree woodlands;
- Mitigation measures for impacts to both individual trees and the woodland community; and
- Preparation and public review of a comprehensive Reservoir Management Plan with clear performance standards prior to project certification.

Until these deficiencies are remedied, it is my professional opinion that the project's impacts to western Joshua trees, Joshua tree woodlands, and other biological resources cannot be determined to be less than significant, nor can take of western Joshua trees be lawfully authorized.

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## References

California Department of Fish and Wildlife. *California Natural Community List*. Feb. 27, 2025. Accessed at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline>.

California Native Plant Society. *Yucca brevifolia Woodland Alliance*, Joshua tree woodland. Accessed online at: <https://vegetation.cnps.org/alliance/99>

California Department of Fish and Wildlife. Western Joshua Tree Conservation Plan. June 2025 Revision. Accessed online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232533&inline>.

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**Declaration of Ileene E. Anderson**

**Re: Impacts to Western Joshua Tree Woodlands, Western Joshua Trees, and Reservoir Issues from the Proposed Willow Rock Energy Storage Center**

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I, Ileene Anderson, declare as follows:

- 1) I am currently a senior scientist and the California Deserts Director for the Center for Biological Diversity. I have worked with the organization for nineteen years.
- 2) My relevant professional qualifications and experience are set forth in the attached resume and the attached testimony and are incorporated herein by reference.
- 3) I prepared the testimony attached hereto and incorporated herein by reference, relating to the impacts of the proposed project on the western Joshua tree, western Joshua tree woodland and other biological resources.
- 4) I prepared the testimony attached hereto and incorporated herein by reference relating to the proposed Willow Rock Energy Storage Center in Kern County, California.
- 5) It is my professional opinion that the attached testimony is true and accurate with respect to the issues that I addressed.
- 6) I am personally familiar with the facts and conclusions described within the attached testimony and if called as a witness, I could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 30, 2025

Signed: 

At: Los Angeles, California

# EXHIBIT A



# Curriculum Vitae For Ileene Anderson



## Education

- M.S. with Distinction, Biology, California State University, Northridge, 1992
- B.A. Cum Laude, Biology, California State University, Northridge, 1989
- A.S. with Honors, Electronics, Bakersfield College, 1981

## Professional Experience

2005 - present

Senior Scientist and California Deserts Director with the non-profit Center for Biological Diversity. Provide scientific expertise necessary for the conservation of California's internationally recognized unique flora and fauna in a variety of public and private land use arenas. My primary projects focus on southern California, including southern California forests, deserts and coastal plains and the numerous projects that occur within their watersheds, local river and their tributaries issues including the Los Angeles River, the Santa Clara River, Santa Ana River. Other areas of focus include the California deserts (Mojave, Colorado and Great Basin), central coast areas and the San Joaquin Valley. I provide scientific expertise on resource issues including as an expert witness, engage as a stakeholder in planning processes, review and provide comments on California Environmental Quality Act and/or National Environmental Policy Act, do public/media relations (print, radio, blog, tweet, TV and social media). I organize staff and volunteers for project implementation on a variety of conservation issues.

1997- 2005

Southern California Regional Botanist for the non-profit California Native Plant Society (CNPS). Provided scientific expertise necessary for the conservation of California's unique vegetation types in a variety of public and private land use plans, including the Four Southern California Forests Updated Land Use Management Plan, the West Mojave Habitat Conservation Plan, the West Riverside Multiple Species Habitat Conservation Plan, the Northern and Eastern Colorado Desert Plan, the Northern and Eastern Mojave Desert Plan, and many other smaller planning efforts. I have commented on hundreds of California Environmental Quality Act and/or National Environmental Policy Act documents, written petitions for plant protection under the federal Endangered Species Act, provided scientific expertise for lawsuit settlement agreements, done public relations in both print and radio, ran CNPS internal consensus building meetings, and organized volunteers for a variety of conservation and fund-raising issues.

1995 - 2005

Consultant on a variety of biological/botanical projects, including rare plant surveys, quantitative and qualitative vegetation community characterization, restoration plans, vegetation monitoring and weed surveys. Project locations comprise a variety of plant communities in southern/central California including riparian, coastal sage scrub, alluvial fan scrub, alkali meadows, chaparral, and a variety of desert scrubs. A full list of projects is available upon request.

1996 - 1999

Part-time instructor at College of the Canyons (community college in Valencia, California). Courses included Introductory Biology for majors (Organismal/Environmental and Cellular/Molecular), Current Topics in Environmental Biology, and Botany. I also developed a course in Economic Botany.

1992 - 1995

Lead Botanist for The Chambers Group (an environmental consulting firm). Projects for which I was responsible included mapping, inventories, and rare plant surveys, which were written in compliance with NEPA and/or CEQA guidelines, including impact analysis and mitigation. This information was typically included in Biological Assessments (BAs), Environmental Assessments (EAs), Environmental Impact Reports (EIRs) or Environmental Impact Statements (EISs). Supervisory duties included coordinating two other botanists. Project management was also part of my duties.

1990 - 1994

Sales Associate at the Theodore Payne Foundation. This part-time job primarily included helping customers select appropriate native plant material for their gardens. Other duties included propagation and transplantation of native plant species.

1990-1992

Herbarium Curatorial Assistant at Rancho Santa Ana Botanic Gardens. Herbarium specimen mounting and curation from international collections was the primary responsibility.

**Professional Courses/Seminars**

Methods of Habitat Restoration - University of California, Riverside, Winter 1993

Desert Restoration - SERCAL, October 1993

Habitat Restoration Evaluation - University of California, Riverside, Winter 1994

Basic Wetlands Delineation - Wetland Training Institute, Inc. November 1995

Mycorrhizae in Habitat Restoration - University of California, Riverside, Winter 1995

Soils Workshop - Natural Resources Conservation Service, November 1998

Plant Community Characterization and Series Identification- Native Plant Society, June 1999

Statistical Analysis for the Modified Whittaker Plot - Colorado State University, August 2002

Willow Flycatcher and Yellow-billed Cuckoo Workshops and Training, May and June 2012

Desert Tortoise Handling Workshop November 2013

San Joaquin Kit Fox Ecology, Conservation, and Survey Techniques Workshop, July 15-18, 2013

Desert Invertebrates Workshop, University of San Diego, May 2017

**Professional Affiliations**

The Wildlife Society- Western Section & local chapters in southern/central California (2015-present)

BLM California Desert Advisory Council - Department of Interior Appointee Representing Renewable Resources (Chairperson 2001) from 1996-2002

California Native Plant Society - Conservation Committee; Legal Committee.

Friends of the Santa Clara River - Director at Large 1998-2018

Society for Ecological Restoration - Coastal Sage Scrub Guild Co-coordinator (1995-2001)

Southern California Botanists - Director at Large (1994-2002)

Chaparral Conservancy - Director at Large 2009-2018

**Expert Witness**

State Water Resources Control Board – May 2007 – Testified on Santa Ana River plant and animal issues.

California Public Utilities Commission – March 2008 – Testified on plant/revegetation issues for Sunrise Powerlink Project.

California Energy Commission – 2010-16 – Testified on a number of rare plant and animal issues for numerous of power station projects.

**Publications, Posters and Presentations**

2025. Desert tortoise management in the California Desert Conservation Area: West Mojave route designation struck down again. Presentation to the Desert Tortoise Council. February, 25, 2025.

2024. Hidden in Plain Site: California's Native Habitats are Valuable Carbon Sinks. Presentation to the Wildlife Society – Western Section. February 2024.

2024. Desert tortoise protection and recovery: The slide towards extinction? Presentation to the Desert Tortoise Council. February 22, 2025

2023. Desert tortoise protection and recovery in a changing climate. Presentation to the Desert Tortoise Council. February 2023

2021. Endangered Species Act Protection and Recovery Implementation. Presentation to the Wildlife Society – Western Section. September 2021

2019. Citizen Enforcement is Key Element to Secure ESA Protection and Implement Recovery: Case Study – Santa Ana Sucker Fish. Presentation at the joint meeting of The Wildlife Society and the American Fisheries Society. October 2019. Reno, NV

2019. Cadiz Water Grab. Presentation at the Public Interest and Environmental Law Conference. February 2019, Eugene OR
2018. Climate Change Adaptation on Public Lands: Effects on Southern California's Deserts. Presentation at the Public Interest and Environmental Law Conference. February 2018, Eugene OR
2018. Twenty Years of Efforts to Protect Wildlife of the Santa Clara River. Presentation at the Wildlife Society – Western Section February 2018. Santa Rosa, CA
2018. Desert Tortoise: Still Protected but Still Declining... Presentation at the 43<sup>rd</sup> Annual Symposium of the Desert Tortoise Council, Las Vegas, NV. February 2018
2017. Unanticipated Consequences: Monitoring for Newly Emerging Wildlife Impacts. Presentation at the Wildlife Society – Western Section February 6 –10, 2017, Reno NV
2017. Citizen Enforcement is Key Element to secure ESA Protection and Implement Recovery: Case Study – Santa Ana Sucker Fish. Presentation at the Wildlife Society – Western Section February 6 –10, 2017, Reno NV
2017. Desert Tortoise: Protected? And Still Declining... Presentation at the 42<sup>th</sup> Annual Symposium of the Desert Tortoise Council, Las Vegas, NV. February 2017
2016. Flat-tailed Horned Lizard Needs Protection. Presentation to the California Fish and Game Commission Meeting, San Deigo, CA December 1, 2016.
2015. Time is of the Essence for Protection and Recovery. Presentation at the 40<sup>th</sup> Annual Symposium of the Desert Tortoise Council, Las Vegas, NV. February 2015.
2014. Conserve, Protect, Recover. Presentation at the 39<sup>th</sup> Annual Symposium of the Desert Tortoise Council, Las Vegas, NV. February 2014.
2012. Desert Tortoise Conservation 2012: an NGO Perspective. Presentation at the 37<sup>th</sup> Annual Desert Tortoise Council Symposium. February 2012.
2011. The Politics of Listing Species. Presentation at the California Native Plant Society Conservation Conference, San Diego, CA, September 2011.
2011. Renewable Energy in Southern California. Presentation at the Wildlife Society- Western Section Conference, Riverside, CA, February 2011.
2010. Moving forward with the DRECP. Presentation at the Stakeholders meeting of the Desert Renewable Energy Conservation Plan, Ontario, CA, September 2010
2010. Considerations for the DRECP. Presentation at the Science Advisors Meeting for the Desert Renewable Energy Conservation Plan, Ontario, CA, April 2010.
2010. Desert Tortoise – Protection and Recovery. Presentation at the 35<sup>th</sup> Annual Symposium of the Desert Tortoise Council, Mesquite, NV. February 2010
2009. Center's Efforts to Protect and Recover the Desert Tortoise. Presentation at the 34<sup>th</sup> Symposium of the Desert Tortoise Council, Las Vegas, NV February 2009.
2009. Global Climate Change and its Effects on Plants and Animals in Southern California. Presentation at the G2 Gallery, Venice, CA. February 2009.
2007. Rethinking Mitigation – Western Riverside MSHCP. Presentation at the California Native Plant Society Conservation Symposium, Sacramento, CA, September 2007.

Yap, Tiffany, Aruna Prabhala, Ileene Anderson. 2024. Hidden in Plain Sight: California's Native Habitats Are Valuable Carbon Sinks. Center for Biological Diversity Report. Pgs. 39.

<https://www.biologicaldiversity.org/programs/urban/pdfs/Hidden-in-Plain-Sight-report.pdf>

Anderson, Ileene, Tiffany Yap, Elizabeth Reid-Wainscoat, J.P. Rose and Aruna Prabhala 2022. State of Utom 2022: Challenges, Opportunities for Southern California's Signature River. Center for Biological Diversity Report. Pg. 61.

<https://www.biologicaldiversity.org/campaigns/Keeping-the-Utom-River-Wild/pdfs/State-of-Utom-River-2022.pdf>

Dickey, John, Maurice Hall, Mark Madison, Jason Smesrud, Margot Griswold, Quitterie Cotten, Mica Heilmann, Greg Roland, Jim Jordahl, Richard Harasick, Wayne Bamossy, Richard Coles, Lizanne Wheeler, Pat Brown, Kevin Burton, Rick Fornelli, Ileene Anderson, Melissa Riedel-Lehrke, Ron Tiller, and Jim Richards 2005. Managing salt to stabilize the Owens Playa with saltgrass. Presented at the Center for Water Resources, Salinity Conference, Sacramento California.

Rodgers, Jane and Ileene Anderson 2002. A Rare Mint (*Monardella robisonii*) in a Rock-Climbing Mecca. Joshua Tree National Park. April 2002. Pgs 25 + appendices.



Anderson, Ileene, Margot Griswold, Dana Kamada, and Adrian Wolf. 2001. Coyote Canyon Landfill: Native Vegetation Restoration Results in Habitat Creation for a Threatened Species. Poster given at Society for Conservation Biology. July 2001.

Hartman, Steve and Ileene Anderson 1999. California Deserts in Transition: Ecosystem Planning. *Fremontia* 27(2): 13-17.

Anderson, Ileene 1998. Status of Sensitive Plant Populations on Public Grazing Allotments within the California Desert Conservation Area. California Native Plant Society. August 1998 Pgs. 34.