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STATE OF CALIFORNIA

**State Energy Resources Conservation and
Development Commission**

In the Matter of:

WILLOW ROCK ENERGY
STORAGE CENTER

Docket No. 21-AFC-02

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

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**REBUTTAL 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 from the Proposed Willow Rock Energy
Storage Center**

Docket 21-AFC-02

Summary of Rebuttal Testimony

This rebuttal responds to the Applicant's claim that the Willow Rock site does not qualify as western Joshua tree woodland based on an estimated <1% canopy cover. That estimate misapplies the California Native Plant Society definition, which is intended to identify localized woodland stands, not site-wide averages. Western Joshua trees often occur in clustered formations where canopy cover exceeds 1% at a smaller scale.

An ecologically appropriate assessment would analyze these clusters using protective buffer zones as defined in BIO-12. Where those zones overlap, they form areas that should be evaluated for woodland classification. The absence of California Department of Fish and Wildlife's Vegetation Classification and Mapping Program mapping does not preclude the presence of western Joshua tree woodland, and site-specific data are essential under CEQA. Where avoidance is infeasible, compensatory mitigation should be required.

Qualifications

My qualifications are summarized and detailed in my Opening Testimony and resume, which is attached thereto as **Exhibit A**. (TN 265163 at 4, 14–17.)¹

Statement of Testimony

I have reviewed the Preliminary Staff Assessment (PSA) (TN 264342) and the Final Staff Assessment (FSA) (TN 264843), and the Applicant's Opening Testimony and Evidence (TN 265170). Pursuant to the Committee's *Notice of Prehearing Conference and Evidentiary Hearing, Fifth Revised Scheduling Order, and Further Orders* (TN 264853 at 6 n.9), this rebuttal testimony responds to an issue I originally raised in my Opening Testimony.

¹ All pinpoint citations refer to the PDF page number.

Western Joshua Tree Woodland Characterization

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 Willow Rock Energy Storage (“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.)

The Applicant’s Opening Testimony acknowledge that Joshua tree woodland occurs along the gen-tie line route options (TN 265170 at 81), but disputes that western Joshua trees documented on the WRESC site may also meet the definition of Joshua tree woodland (TN 265170 at 86). In support of this position, the Applicant asserts that it “estimated” canopy cover of western Joshua tree in the WRESC, P1, and P2 sites as less than 1%, and therefore concludes that these areas do not meet the California Native Plant Society (CNPS) definition of Joshua tree woodland. (TN 265170 at 86.)

However, this assertion reflects a misunderstanding of both the scale-dependent nature of cover estimation and the intent of the CNPS classification criteria.

First, the Applicant does not present a quantified canopy cover estimate; it merely states that cover is less than 1%. Additionally, while it may be true that average WJT cover across the entire project site is less than 1%, this metric obscures the fact that WJT distribution is heterogeneous. Western Joshua trees often occur in clustered formations, including areas where local cover easily exceeds the 1% threshold. For instance, a ¼-acre area with several mature WJTs may represent cover well above 1%. However, when this area is averaged across a 100-acre project site, its distribution is diluted. This approach fails to capture ecologically meaningful woodlands and underrepresents potential impacts to woodland habitat.

Importantly, the CNPS definition of Joshua tree woodland (i.e., areas where WJT provides $\geq 1\%$ canopy cover and *Juniperus* and *Pinus* species are $< 1\%$) is not constrained to site-wide averages. (See TN265164 at 4.) Rather, it is a vegetation alliance-level classification intended to identify and conserve discrete stands of WJT

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that exhibit woodland characteristics, even if those stands occur within a larger matrix of more sparsely vegetated desert scrub.

To more accurately assess the presence of WJT woodland on site, there must be an evaluation of areas of localized tree density using an ecologically appropriate scale. One reasonable method is to delineate “protective zones” around each tree, consistent with the no-work buffers identified in BIO-12. Where these protective zones overlap or form contiguous patches, the perimeter of the resulting area can be used to define an ecologically relevant polygon within which canopy cover should be assessed. If canopy cover within such polygons meets or exceeds the 1% threshold, those areas qualify as WJT woodland under the CNPS definition, regardless of broader site-wide averages.

Lastly, while it is true that the site has not yet been mapped as WJT woodland under the California Department of Fish and Wildlife’s Vegetation Classification and Mapping Program (VegCAMP), the absence of such mapping does not preclude the existence of WJT woodlands. VegCAMP maps are not exhaustive and are often incomplete in coverage. Site-specific field data and analysis, especially when conducted for CEQA review, are essential for identifying unmapped but ecologically significant resources.

In summary, the Applicant’s conclusion that WJT woodland is absent—based on a site-wide average of <1% canopy cover or an otherwise undisclosed methodology—is misleading and inconsistent with vegetation classification principles. Localized patches of woodland should be identified and avoided where feasible, in accordance with both the CNPS definition and the conservation intent of the Western Joshua Tree Conservation Act. Where avoidance is infeasible, compensatory mitigation for impacts to Joshua tree woodland must be required.

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Declaration of Ileene E. Anderson

**Re: Impacts to Joshua Tree Woodlands from the Proposed Willow Rock
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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) A copy of my professional qualifications and experiences were submitted with my Opening Testimony (TN 265163) and are incorporated herein by reference.
- 3) I prepared the rebuttal testimony attached hereto and incorporated herein by reference, relating to the impacts of the proposed Willow Rock Energy Storage project on western Joshua tree woodland.
- 4) It is my professional opinion that the attached testimony is true and accurate with respect to the issues that I addressed.
- 5) 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: August 6, 2025

Signed:


A handwritten signature in dark ink, appearing to read "Ileene E. Anderson", is written over a faint rectangular stamp.

At: Los Angeles, California