



Basin and Range Watch  
P.O. Box 153  
Baker, CA 92309  
[www.basinandrangewatch.org](http://www.basinandrangewatch.org)

**DOCKET**

**07-AFC-5**

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September 11, 2009

John Kessler  
Project Manager  
Siting, Transmission and Environmental Protection Division  
California Energy Commission  
1516 Nineth Street, MS-15  
Sacramento, CA 95814  
[jkessler@energy.state.ca.us](mailto:jkessler@energy.state.ca.us)

Dear Mr. Kessler,

Basin and Range Watch has been making an on-going photographic database of resources that would be impacted by the proposed Bright Source Solar Partners I, LLC; Solar Partners II, LLC; Solar Partners IV, LLC; and Solar Partners VIII, LLC Ivanpah Solar Electric Generating System (ISEGS). We would like to request that the database be posted on the California Energy Commission's Ivanpah Solar Electric Generating System Documents web page. All of the photos were taken in the Ivanpah Valley, most of them being from the proposed site of development. Our goal is to provide a visual resource for interested parties to educate themselves concerning the large percentage of resources that would be compromised if development of the project is approved. So far we have made 5 visits to the proposed site and will continue to do so over the next year in an attempt to document as much as we can.

Basin and Range Watch is a volunteer group of biologists and former employees with land management agencies who live and own property in the deserts of Nevada and California. Our mission is to preserve the open spaces and diversity of life in this region and highlight the threats to our desert home. We feel that the Ivanpah Solar Electric Generating System is not an appropriate use for this region of the Mojave Desert. The proposed site represents a biologically diverse section of the Mojave Desert and features unique populations of biota; some found in few other places. The project could also pave the way for several other similar projects to be developed in the same region. Such industrial development of this region has the potential to not only remove habitat directly, but cut off wildlife corridors for species such as the desert tortoise. Development of just one of these projects would be so large that it could cut off the connectivity that many wildlife species require to maintain their genetic diversity.

We feel that industrial energy development of our desert ecosystems is an inappropriate use of our visually, biologically and culturally rich public lands. The California Energy Commission and Federal Land Management agencies should be considering a more environmentally responsible use of renewable energy that utilizes roof tops and brown fields near urban areas.

All photos are copyright Basin and Range Watch unless otherwise indicated.

Thanks to the California Energy Commission for considering our request.

Sincerely,

Kevin Emmerich  
Laura Cunningham  
P.O. Box 70  
Beatty, NV 89003  
[atomicoadranch@netzero.net](mailto:atomicoadranch@netzero.net)



The proposed Bright Source Solar Partners I, LLC; Solar Partners II, LLC; Solar Partners IV, LLC; and Solar Partners VIII, LLC Ivanpah Solar Electric Generating System (ISEGS) is located within the Northeastern Mojave Desert bioregion. It would be built in three sections on 4,065 acres in eastern San Bernardino County, California, very close to the

Nevada boundary. The topography is characterized by broad alluvial fans draining the Clark Mountains crossed by numerous ephemeral washes.



The site is very rich in biological diversity. The vegetation community is defined as Mojave Desert Scrub with Creosote bush (*Larrea tridentata*), Bursage (*Ambrosia dumosa*), Rhatany (*Krameria sp.*), Mojave yucca (*Yucca schidigera*), Big galleta grass (*Hilaria rigida*), Woolly plantain (*Plantago ovata*), Silver cholla (*Cylindropuntia echinocarpa*), Catclaw acacia (*Acacia greggii*) and Barrel cactus (*Ferocactus cylindraceus*). Ten plant species listed by the California Native Plant Society (CNPS) as CNPS List 1B or CNPS List 2 occur on the site. One of these, Rusby's mallow (*Sphaeralcea rusby var. eremicola*), is also a BLM sensitive species. The other 9 are Cave Evening-Primrose (*Oenothera cavernae*), Mojave Milkweed (*Asclepias nyctaginifolia*), Desert Pincushion (*Coryphantha chlorantha*), Small-Flowered Androstephium (*Androstephium breviflorum*), Utah Vine Milkweed (*Cynanchum utahense*), Parish's Club-Cholla (*Grusonia parishii*), Utah Mortonia (*Mortonia utahensis*) Desert portulaca (*Portulaca halimoides*). The site is also home to a diverse population of wildlife including 13 special status species and one Federally Threatened species. These include the Burrowing owl (*Athene cunicularia hypugaea*), Le Conte's Thrasher (*Toxostoma lecontei*), Nelson's Bighorn Sheep (*Ovis canadensis nelsoni*), and Townsend's big-eared bat (*Corynorhinus townsendii*). The desert tortoise (*Gopherus agassizii*) population is part of the Northeastern Mojave Recovery Unit outlined in the Fish and Wildlife Service 1994 Desert Tortoise Recovery Plan (Mojave Population). Recent genetic studies by Murphy et al., 2007 have concluded that tortoise populations from different recovery units including the Northeastern Mojave Recovery Unit are unique. Former research has indicated that the project area supports 50 to 100 individuals per square mile (Berry 1984). The site also contains numerous historic and prehistoric cultural resources that would be forever lost if the project is approved. These include campsites, lithic scatters, agave roasting pits, ceramic artifacts, and old trails across the valley. Obsidian and chert stone tools and a nodule of obsidian exotic to the area were found in the project site. The area lies within the homeland of the Southern Paiute and Chemehuevi Tribes. Historic relicts in the area include an old cattle corral, historic mining, salt works, old roads, historic tin cans and bottles, a stone wall, and an old telegraph station. Foot, horse, wagon, and, most recently, automobile traffic would have passed through the project area coming up off of the valley floor and heading toward the mines in the Clark Mountain Range from the 1860s through the 1910s.





Visual impacts would be irreversible. The proposed site is located adjacent to the Clark Mountain unit of the Mojave National Preserve and lies adjacent to the Mesquite Mountains Wilderness Area and within less than one mile of the Stateline Wilderness Area.



The following photos are an on-going database that Basin and Range Watch is keeping to document the loss of several irreplaceable resources. All of the photos were taken in Ivanpah Valley. Most of them were taken on the proposed project site by Basin and Range Watch unless otherwise indicated.

## **BIOLOGICAL RESOURCES**



Desert dandelion (*Malacothrix glabrata*)



Desert marigold (*Baileya multiradiata*)



Woolly daisy (*Eriophyllum wallacei*)



Threadleaf groundsel (*Senecio flaccidus*)





Annual buckwheat (*Eriogonum* sp.)



Fremont phacelia (*Phacelia fremontii*)



Copper's desert thorn (*Lycium cooperi*)



Flowering Purple sage (*Salvia dorrii*)



Mojave Aster (*Xylorhiza tortifolia*)



Common checkered beetle (*Trichodes ornatus*) on flowers of Mojave aster (*Xylorhiza tortifolia*)



Turpentine broom (*Thamnosma montana*)



Coyote tobacco (*Nicotiana obtusifolia*)



Forget-me-not (*Cryptantha* sp.)





Trumpet buckwheat (*Eriogonum inflatum*)



Fiddleneck flower (*Amsinckia tessellata*)



Elegant lupines (*Lupinus concinnus*)



Gilia (*Gilia* sp.)



Notch-leaf phacelia (*Phacelia crenulata*)



Cave-dwelling evening primrose (*Oenothera cavernae*) (Photo used with permission by Michael Charters)



Rattlesnakeweed (*Chamaesyce albomarginata*).



Tiny Comb-burs (*Pectocarya* sp.)



Mojave yucca (*Yucca schidigera*)





Clark Mountain agave (*Agave utahensis* var. *nevadensis*)



Fluffgrass (*Erioneuron pulchellum*)



Big galleta (*Hilaria* [*Pleuraphis*] *rigida*)



Creosote bush (*Larrea tridentata*)



Creosote bush flowers (*Larrea tridentata*)



Catclaw acacia (*Acacia greggii*)



Desert almond (*Prunus fasciculata*)



Beavertail (*Opuntia basilaris*)



Pencil cholla (*Cylindropuntia ramosissima*)



Desert barrel cactus (*Ferocactus cylindraceus*)



Silver cholla (*Cylindropuntia echinocarpa*)





Buckhorn cholla (*Cylindropuntia acanthocarpa* var. *coloradensis*)



Calico cactus (*Echinocereus engelmannii*)



Desert puffball (*Podaxis pistillaris*)



Cyanobacteria: Cryptogamic crust in soil



California patch (*Chlosyne californica*)



Desert iguana (*Dipsosaurus dorsalis*)



Western banded gecko (*Coleonyx variegatus*)



Desert horned lizard (*Phrynosoma platyrhinos*)



Long-nosed leopard lizard (*Gambelia wislizenii*)



Coachwhip (*Masticophis flagellum*)



Leaf-nosed snake (*Phyllorhynchus decurtatus*)



Sidewinder (*Crotalus cerastes*)





Mojave rattlesnake (*Crotalus scutulatus*)



Desert tortoise (*Gopherus agassizii*) burrow



Desert tortoise (*Gopherus agassizii*)



Merriam's kangaroo rat (*Dipodomys merriami*)



Bobcat (*Lynx rufus*) tracks



Desert Bighorn Sheep (*Ovis canadensis nelsoni*) in immediately adjacent Stateline Wilderness Area



Ash-throated flycatcher (*Myiarchus cinerascens*)



Cactus Wren (*Campylorhynchus brunneicapillus*)



Loggerhead shrike in flight (*Lanius ludovicianus*)



Le Conte's Thrasher (*Toxostoma lecontei*)



## **CULTURAL RESOURCES**



Possible prehistoric trail



Historical Artifacts

## **EPHEMERAL WASHES**

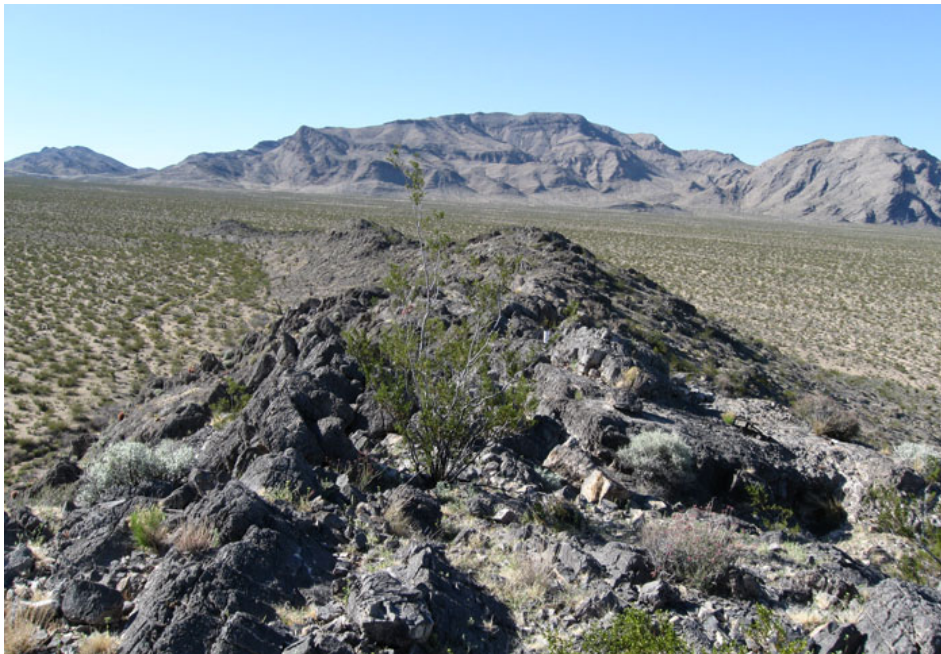


One of the many ephemeral desert washes that crosses the proposed project site.



View of ephemeral wash from hill looking north.

## **VISUAL RESOURCES**



View of Stateline Wilderness Area looking north from the small limestone hill.



Clark Mountain, Mojave National Preserve looking west from proposed site.



Large bajada looking north towards Stateline Wilderness Area.





Relatively undisturbed night sky, looking south from proposed site during the full moon. June, 2009. This would change dramatically if the facility is constructed.



Old Growth Mojave Desert

Biological resources provide scenic characteristics that the Mojave Desert is famous for. Old growth desert ecosystems also act as carbon sinks. Many scientists believe that removal of these ecosystems could contribute to carbon buildup in the atmosphere; making the problem of climate change even worse.



View of proposed ISEGS site from the Stateline Wilderness Area.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – WWW.ENERGY.CA.GOV**

APPLICATION FOR CERTIFICATION  
FOR THE *IVANPAH SOLAR ELECTRIC  
GENERATING SYSTEM*

DOCKET No. 07-AFC-5  
PROOF OF SERVICE  
(Revised 7/20/09)

**APPLICANT**

Solar Partners, LLC  
John Woolard,  
Chief Executive Officer  
1999 Harrison Street, Suite #500  
Oakland, CA 94612

Todd A. Stewart, Project Manager  
Ivanpah SEGS  
[sdeyoung@brightsourceenergy.com](mailto:sdeyoung@brightsourceenergy.com)

**E-mail Preferred**

Steve De Young, Project Manager  
Ivanpah SEGS.  
1999 Harrison Street, Ste. 2150  
Oakland, CA 94612  
[tstewart@brightsourceenergy.com](mailto:tstewart@brightsourceenergy.com)

**APPLICANT'S CONSULTANTS**

John L. Carrier, J. D.  
2485 Natomas Park Dr. #600  
Sacramento, CA 95833-2937  
[jcarrier@ch2m.com](mailto:jcarrier@ch2m.com)

**COUNSEL FOR APPLICANT**

Jeffery D. Harris  
Ellison, Schneider  
& Harris L.L.P.  
2600 Capitol Avenue, Ste. 400  
Sacramento, CA 95816-5905  
[jdh@eslawfirm.com](mailto:jdh@eslawfirm.com)

**INTERESTED AGENCIES**

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

Tom Hurshman,  
Project Manager  
Bureau of Land Management  
2465 South Townsend Ave.  
Montrose, CO 81401  
[tom\\_hurshman@blm.gov](mailto:tom_hurshman@blm.gov)

\*Raymond C. Lee, Field Manager  
Bureau of Land Management  
1303 South U.S. Highway 95  
Needles, CA 92363  
[Raymond\\_Lee@ca.blm.gov](mailto:Raymond_Lee@ca.blm.gov)

Becky Jones  
California Department of  
Fish & Game  
36431 41st Street East  
Palmdale, CA 93552  
[dfgpalm@adelphia.net](mailto:dfgpalm@adelphia.net)

**INTERVENORS**

California Unions for Reliable Energy ("CURE")  
Tanya A. Gulesserian  
Marc D. Joseph  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Ste 1000  
South San Francisco, CA 94080  
[tgulesserian@adamsbroadwell.com](mailto:tgulesserian@adamsbroadwell.com)

Western Watersheds Project  
Michael J. Connor, Ph.D.  
P.O. Box 2364  
Reseda, CA 91337-2364  
[mjconnor@westernwatersheds.org](mailto:mjconnor@westernwatersheds.org)

Gloria Smith, Joanne Spalding  
Sidney Silliman, Sierra Club  
85 Second Street, 2<sup>nd</sup> Fl.  
San Francisco, CA 94105  
**E-mail Service Preferred**  
[gloria.smith@sierraclub.org](mailto:gloria.smith@sierraclub.org)  
[joanne.spalding@sierraclub.org](mailto:joanne.spalding@sierraclub.org)  
[gssilliman@csupomona.edu](mailto:gssilliman@csupomona.edu)

\*indicates change



## INTERVENORS CONT.

Joshua Basofin, CA Rep.  
Defenders of Wildlife  
1303 J Street, Ste. 270  
Sacramento, CA 95814

**E-mail Service Preferred**  
[jbasofin@defenders.org](mailto:jbasofin@defenders.org)

Basin and Range Watch  
Laura Cunningham  
Kevin Emmerich  
P.O. Box 70  
Beatty, NV 89003  
[atomicoadranch@netzero.net](mailto:atomicoadranch@netzero.net)

Center for Biological Diversity  
Lisa T. Belenky, Sr. Attorney  
Ileene Anderson, Public Lands Desert Director  
351 California Street, Ste. 600  
San Francisco, CA 94104  
**E-mail Service Preferred**  
[lbelenky@biologicaldiversity.org](mailto:lbelenky@biologicaldiversity.org)  
[ianderson@biologicaldiversity.org](mailto:ianderson@biologicaldiversity.org)

California Native Plant Society  
Greg Suba, Tara Hansen & Jim Andre  
2707 K Street, Suite 1  
Sacramento, California, 95816-5113  
**E-mail Service Preferred**  
[gsuba@cnps.org](mailto:gsuba@cnps.org)  
[thansen@cnps.org](mailto:thansen@cnps.org)  
[granites@telis.org](mailto:granites@telis.org)

## ENERGY COMMISSION

JEFFREY D. BYRON  
Commissioner and Presiding Member  
[jbyron@energy.state.ca.us](mailto:jbyron@energy.state.ca.us)

JAMES D. BOYD  
Vice Chairman and  
Associate Member  
[jboyd@energy.state.ca.us](mailto:jboyd@energy.state.ca.us)

Paul Kramer  
Hearing Officer  
[pkramer@energy.state.ca.us](mailto:pkramer@energy.state.ca.us)

John Kessler  
Project Manager  
[jkessler@energy.state.ca.us](mailto:jkessler@energy.state.ca.us)

Dick Ratliff  
Staff Counsel  
[dratliff@energy.state.ca.us](mailto:dratliff@energy.state.ca.us)

Elena Miller  
Public Adviser  
[publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)

STATE OF CALIFORNIA  
State Energy Resources  
Conservation and Development Commission

In the Matter of: ) 07-AFC-05  
)  
Ivanpah Solar Electric )  
Generating System ) **DECLARATION OF SERVICE**

I, LAURA CUNNINGHAM, KEVIN EMMERICH  
BASIN AND RANGE WATCH declare that on 9-9-2009, I served and filed copies of the attached *Petition to Intervene*, accompanied by a copy of the most recent *Proof of Service* list (most recent version is located on the proceeding's web page) with the Docket Unit OR with the presiding committee member of the proceeding. The document has been sent to the Commission AND the applicant, as well as the other parties in this proceeding (as shown on the *Proof of Service* list), in the following manner:

**(Check all that Apply)**

**FOR SERVICE TO THE APPLICANT AND ALL OTHER PARTIES:**

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery or by depositing in the United States mail at Beatty, NV with first-class postage thereon fully prepaid and addressed as provided on the *Proof of Service* list above to those addresses **NOT** marked "email preferred."

**AND**

**FOR FILING WITH THE ENERGY COMMISSION:**

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

**OR**


- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION -or-  
Attn: Docket No. 07-AFC-07  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

CALIFORNIA ENERGY COMMISSION  
Presiding Member  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Re: Docket No

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

  
Name \_\_\_\_\_ Date 9-9-2009  
