

Joshua Basofin
California Representative
Defenders of Wildlife

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|-----------------|--------------------|
| DOCKET | |
| 07-AFC-5 | |
| DATE | <u>MAR 03 2009</u> |
| RECD. | <u>MAR 04 2009</u> |

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:)
)
) Docket No. 07-AFC-5
)
Application for Certification)
for the Ivanpah Solar Electric)
Generation System)
)
) PETITION FOR INTERVENTION
)
)
)
)
_____)

Petitioner, Joshua Basofin, California Representative, Defenders of Wildlife, states:

1. Petitioner, Joshua Basofin, California Representative, Defenders of Wildlife, petitions to intervene in the above-entitled proceeding.
2. Petitioner's address, telephone number and email address are:

1303 J Street, Suite 270
Sacramento, California 95814
916-313-5800 x108
jbasofin@defenders.org
3. Petitioner's position and interest in the proceeding are:

See Attachment 1.
4. Petitioner does wish to reserve the right to present evidence and to cross-examine witnesses.
5. Petitioner will be represented by: Joshua Basofin, California Representative, Defenders of Wildlife

Date Signature

Check box if continuation pages are attached.
(Proof of Service Must be Attached)

Attachment 1

Defenders of Wildlife (“Defenders”) is dedicated to protecting all wild animals and plants in their natural communities. To this end, Defenders employs science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions in order to impede the accelerating rate of extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

Defenders strongly supports the emission reduction goals found in AB 32, including the development of renewable energy in California. However, we urge that in the quest for renewable power that project proponents design their projects in the most sustainable manner possible. This is essential to ensure that project approval moves forward expeditiously and in a manner that does not sacrifice our fragile desert landscape and wildlife in the rush to meet our renewable energy goals.

The Ivanpah Solar Energy Generating Station (“ISEGS”) is a massive project that has increased from a 3,400-acre footprint to a 4,065 acre footprint and includes three solar concentrating thermal power plants, associated buildings, roads, a gas and water pipeline, new groundwater pumping, and a reconducted transmission line.

Based on a review of the Preliminary Staff Assessment of the ISEGS Application for Certification and associated documents, Defenders has several serious concerns about the potential impacts of this project on a number of rare, declining and listed species and on their desert habitat and waters. These concerns were first outlined in our comments to the Bureau of Land Management, dated January 31, 2008, on the Notice of Intent to prepare an Environmental Impact Statement. At that time we also offered a number of recommendations regarding issues that need to be adequately examined in the Environmental Impact Report and Final Staff Assessment (“EIR/FSA”).

Defenders is concerned that the applicant has not considered alternative sites for the project. Defenders is also very concerned that the applicant has not yet provided specific information concerning methods of compensation for loss of desert tortoise habitat, for loss of rare plants and other sensitive species, or for impacts to state waters. Finally, Defenders seeks to ensure the applicant proposes adequate desert tortoise translocation guidelines.



**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 2/10/08)

APPLICANT

Solar Partners, LLC
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Alicia Torre, Project Manager
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Steve De Young, Director
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APPLICANT'S CONSULTANTS

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COUNSEL FOR APPLICANT

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& Harris L.L.P.
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INTERESTED AGENCIES

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INTERVENORS

California Unions for Reliable
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DECLARATION OF SERVICE

I, Joshua Basofin, declare that on March 3, 2009, I served and filed copies of the Attached Petition for Intervention, dated March 3, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[www.energy.ca.gov/sitingcases/ivanpah]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO 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 Sacramento, CA 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

sending and 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

Attn: Docket No. 07-AFC-5

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

docket@energy.state.ca.us

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