

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE IVANPAH SOLAR
ELECTRIC
GENERATING SYSTEM

DOCKET NO. 07-AFC-5

DOCKET	
07-AFC-5	
DATE	<u>NOV 16 2009</u>
RECD.	<u>NOV 16 2009</u>

***PRELIMINARY PREHEARING CONFERENCE STATEMENT OF
INTERVENOR WESTERN WATERSHEDS PROJECT***

November 16, 2009

Michael J. Connor, Ph.D.
California Director
Western Watersheds Project
PO Box 2364
Reseda, CA 91337-2364
(818) 345-0425
mjconnor@westernwatersheds.org

TITLE

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE IVANPAH SOLAR
ELECTRIC
GENERATING SYSTEM

DOCKET NO. 07-AFC-5

***PRELIMINARY PREHEARING CONFERENCE STATEMENT OF
INTERVENOR WESTERN WATERSHEDS PROJECT***

Pursuant to the Notice of Prehearing Conferences and Evidentiary Hearing, Intervenor Western Watersheds Project (“WWP”) provides this Preliminary Prehearing Conference Statement. WWP will be represented by Michael J. Connor at the Initial Prehearing Conference on November 18, 2009, using the teleconference option.

1. The topic areas that are complete and ready to proceed to evidentiary hearing:

WWP has not yet had sufficient time to complete review of all the topic areas that we wish to pursue at the evidentiary hearing. At this time WWP cannot agree that any topic areas are complete and ready to proceed to evidentiary hearing.

2. The topic areas that are not complete and not yet ready to proceed to evidentiary hearing, and the reasons therefore:

The topic areas that WWP intends to pursue at the evidentiary hearing but that are not complete at this time include all the topic areas listed below in Section 3 as disputed issues. WWP only received the hard copy on November 13, 2009. WWP has been unable to complete its review of the electronic version of the 1,200-page FSA/DEIS and track down referenced documents because of the short timeframe. WWP places high value on public participation. However, the failure to adequately identify impacts, analyze those impacts and provide documentary evidence or any adequate basis for the staff’s conclusions in the FSA/DEIS is undermining adequate public participation in this process in violation of both the spirit and letter of CEQA and NEPA.

3. The topic areas that remain disputed and require adjudication, and the precise nature of the dispute for each topic:

This is only a partial list provided for this *Preliminary* Prehearing Conference Statement. WWP stresses that the FSA/DEIS is incomplete and appears to have been prepared in a rush rather than to be the result of adequate analysis and research regarding impacts to the environment. Many of the disputed issues identified below involve both legal and factual disputes while others are predominantly legal issues. WWP therefore respectfully reserves the right to address each disputed issue, and any other disputed issues identified at the preliminary prehearing conference at later stages of this process including in briefing following the evidentiary hearing.

Project Description: The project description is too narrow and segments environmental review of this project from other connected projects that are necessary for the project to proceed. The project description should include the substation and transmission line projects for which coordinated environmental review should have been provided.

Purpose and Need: The FSA/DEIS fails to address risks associated with global climate change in context including both the need for climate change mitigation strategies (e.g., reducing greenhouse gas emissions) and the need for climate change adaptation strategies (e.g., conserving intact wild lands and the corridors that connect them). Renewable energy projects, including the proposed ISEGS project, are elements of a national climate change mitigation strategy to reduce greenhouse gas emissions. Several California state, national, and international climate change reports describing climate change adaptation strategies underline the importance of protecting intact wild lands and associated wildlife corridors as a priority adaptation strategy measure.

As the FSA/DEIS admits building the proposed ISEGS project at the proposed location "would have major impacts to the biological resources of the Ivanpah Valley, substantially affecting many sensitive plant and wildlife species and eliminating a broad expanse of relatively undisturbed Mojave Desert habitat." (FSA/DEIS p. 1-17), including "Permanent loss of 4,073+ acres of Mojave creosote scrub and other native plant communities, including approximately 6,400 barrel cacti; permanent loss of cover, foraging, breeding habitat for wildlife; habitat fragmentation and loss of connectivity for terrestrial wildlife; disturbance/dust to nearby vegetation and wildlife; increased predation due to increased raven/predator presence; spread of non-native invasive weeds; and direct, indirect, cumulative impacts to special status plant species." (FSA/DEIS p. 6.2-72)

The habitat fragmentation, loss of connectivity for terrestrial wildlife, and introduction of predator and invasive weed species associated with the ISEGS project in the proposed location are anathema to an effective climate change adaptation strategy. Siting the proposed ISEGS project in the proposed location in Ivanpah Valley confounds our climate change adaptation strategy with a poorly executed climate change mitigation strategy. WWP believes that the solution to this problem is to build and operate the proposed ISEGS project (to implement the mitigation strategy) in an alternative site away from intact wild lands (to implement the adaptation strategy). The way to maintain healthy, vibrant ecosystems is not to fragment them and reduce their biodiversity. The

FSA/DEIS improperly assumes, to the contrary, that the proposed ISEGS plant must be built at this location.

Air Quality 6.1: The FSA/DEIS fails to address several key air quality issues including but not limited to PM 10. Of particular concern is that plans to minimize air quality impacts from construction, operations, and decommissioning are all deferred to later development with no clear standards.

Biological Resources 6.2: The identification and analysis of impacts to all biological resources is inadequate and little to no attempt is made to avoid impacts to these resources or minimize the impacts as required under CEQA. Moreover, there is insufficient identification and analysis of impacts to show that the proffered mitigation measures will provide adequate mitigation and the mitigation measures that are discussed are far too vague and uncertain (unlawfully) leaving development of critical mitigation plans to a later time.

a. Bighorn: The FSA/DEIS fails to fully analyze impacts to bighorn, provide alternatives to avoid impacts, or provide measures to minimize impacts. For example, the suggested mitigation measure of adding additional an artificial water source in the Clark Mountain area will not mitigate for the loss of bajada foraging habitat. The FSA/DEIS also fails to identify and analyze the impacts associated with construction and maintenance of the artificial water source suggested as a mitigation measure.

b. Desert tortoise: The FSA/DEIS discussion of desert tortoise impacts and the proposed mitigation is wholly inadequate and WWP will provide detailed information on the disputed factual issues going forward. As an initial matter, the FSA/DEIS fails to adequately address the following issues and the proposed mitigation is inadequate in the following ways:

- The tortoises present in the North Ivanpah Valley are part of the Northeastern Mojave desert tortoise population.
- Northeastern Mojave desert tortoises are an Evolutionary Significant Unit.
- Northeastern Mojave desert tortoises are the most genetically distinct population of California's desert tortoises.
- The Northeastern Mojave tortoise population is declining. The most recent range wide surveys¹ show that current tortoise densities within the Northeastern Mojave Recovery Unit are the lowest of the six Recovery Units recognized in the Recovery Plan.
- Northeastern Mojave desert tortoises have an extremely limited range in California. The North Ivanpah Valley contains a significant portion of this range in California.

¹ Fish and Wildlife Service. 2009. Range-wide Monitoring of the Mojave Population of the Desert Tortoise: 2007 Annual Report. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada.

- The proposed project will directly, indirectly and cumulatively impact the Northeastern Mojave population. The impacts include destruction and loss of habitat, take of Northeastern desert tortoises, population fragmentation, and compromised viability.
- The FSA/DEIS proposes mitigating impacts by acquiring habitat and implementing recovery actions in the Eastern Mojave Desert Tortoise Recovery Unit, an area occupied by a different Evolutionary Significant Unit of desert tortoise.
- The mitigations proposed for the project do not meet CESA's fully mitigated standard.
- The actual number of tortoises on the project site and the actual number of resident tortoises in the proposed relocation and translocation areas should be determined using appropriate survey techniques.
- The take minimization measures for desert tortoise are inadequate. For example, the FSA notes that FWS stated that fencing along I-15 is critical before any tortoise translocations are undertaken (FSA/DEIS at 6.2-50) however Bio-9 for tortoise does not require that the fencing be in place.

c. Other Wildlife: The FSA/DEIS fails to fully analyze impacts to gila monsters, burrowing owl, other bird species, bats and other wildlife or to provide alternatives to avoid impacts, or provide measures to minimize impacts.

c. Habitat Loss and Compensatory Mitigation: The compensatory mitigation plan relies on so-called "nesting" to provide compensatory mitigation for loss of habitat and individuals for multiple several plants and animal species. The plan described in the FSA/DEIS proposes acquisition of desert tortoise habitat in the Eastern Mojave Recovery Unit and will not mitigate impacts to California's Northeastern Mojave tortoise population that is being impacted by the proposed action. Because the plan described in the FSA/DEIS only addresses desert tortoise habitat, it may also be inadequate to provide for the mitigation needs of the many other species that will be impacted by the project. WWP believes that the staff must revisit this issue and explain how the compensatory mitigation will benefit the Northeastern Mojave desert tortoise population and how the so-called "nesting" of mitigation will actually provide for compensatory mitigation for each species of rare or sensitive plant and animal, including listed species as well as gila monster, burrowing owl, nesting bird species, badger, and Nelson bighorn sheep.

d. Rare Plants and Special Status Plant Communities: For rare plants and special status plant communities the FSA/DEIS provides too little analysis of impacts, inadequate discussion of alternatives that could avoid impacts, and inadequate information about the proposed mitigation strategy. The FSA/DEIS concludes that the ISEGS project will result in "impacts to Mojave milkweed and Rusby's desert-mallow" that "would remain significant in a CEQA context even after implementation of the special-status plant impact avoidance and minimization measures described in Energy Commission staff's proposed conditions of certification." (FSA/DEIS p. 1-18) The CEC staff was unable to identify private lands with existing occurrences of impacted rare plants that would serve as suitable rare plant mitigation lands. Furthermore, for

implementing of many of the suggested protection measures on public lands there would need to be additional NEPA analysis, which is deemed too lengthy a process to perform for this project. The best way to avoid CEQA-significant impacts to rare plants occurring at this site is to relocate the project to another, lower resource value site which was not adequately considered in the FSA/DEIS.

From an initial review it also appears that the FSA/DEIS fails to adequately consider CNPS List 2 plants (rare in California but more common elsewhere) meet the definition of "rare" under CEQA (CEQA Guidelines Section 15380). CNPS List 2 plants represent important peripheral populations of rare plant taxa restricted to narrow growth conditions.

In addition, the FSA/DEIS fails to identify and analyze the loss of carbon sequestration that will occur under the proposed project. Desert vegetation types are able to sequester atmospheric carbon dioxide (greenhouse gas) 24 hours/day, unlike other vegetation communities which are able to sequester CO₂ only during daylight hours. ISEGS and all desert utility-scale projects to follow will decrease the carbon sequestration benefits from desert vegetation. (Wohlfahrt et al. 2008²) This impact should have been identified and analyzed in the FSA/DEIS.

Special-Status Plant Impact Avoidance and Minimization. The measures provided in the FSA/DEIS are also inadequate for the following reasons

1. The mitigation requirements to address rare plant impacts do not represent mitigation when full implementation of all measures still result in significant impacts under CEQA.
2. Transplantation is not a successful mitigation practice for rare plants since current knowledge of conditions favorable to plant survival are incomplete.
3. The lack of fall surveys under-represents the full suite of rare plant taxa occurring on site - these need to be done on this site and desert project sites.
4. No detail is provided on how the applicant will reconfigure the project features within the northern portions of ISEGS 1 and 3 to avoid areas that support the highest density and diversity of rare plant species.
5. The FSA/DEIS fails to explain how the acquisition of lands for desert tortoise habitat represent appropriate lands for desert rare plants. As presented in the FSA/DEIS, the proposed 3:1 "nesting" approach to mitigation land acquisition could completely fail to provide any actual mitigation for the rare plants affected by the proposed project.

² Wohlfahrt, G., Fenstermaker, L. F. and Arnone, J. A. III. 2008. Large annual net ecosystem CO₂ uptake of a Mojave Desert ecosystem. *Global Change Biology*. 14(7): 1475-1487. WWP notes that the FSA/DEIS at 6.1-73 mentions this study in dismissing similar concerns raised by the public but erroneously uses the wrong units: Wohlfahrt cite g C per square not cubic meter.

6. No mitigation measures are provided for the loss of carbon sequestration from desert vegetation types which are able to sequester atmospheric carbon dioxide (greenhouse gas) 24 hours/day, unlike other vegetation communities which are able to sequester CO₂ only during daylight hours.

e. Limiting the Spread of Invasive Non-Native Plants/Weeds: WWP is concerned that the FSA/DEIS fails to fully analyze the project's direct, indirect, and cumulative effects on the spread of invasive weeds.

f. Impacts to National Park Service Lands and Resources: The FSA/DEIS fails to adequately address the impacts to National Park Service Lands and resources including potential impacts to water resources (springs and seeps); impacts to dark night skies due to night lighting at the project site; impacts to bighorn that live in the Clark Mountains area; and others. *See* below re cumulative impacts as well. No measures are provided to avoid or minimize and mitigate these impacts.

g. Cultural Resources and Native American Values 6.3: WWP is concerned that the FSA/DEIS analysis of impacts to cultural resources and Native American values fails to fully analyze the project's direct, indirect, and cumulative effects

h. Land Use 6.5:

Under both local and federal plans this area is inappropriate for the proposed exclusive industrial use of public lands to the exclusion of all other uses. FLPMA provides for multiple use. In addition, the projects when seen in the context of other connected projects (including multiple solar projects, two substations and additional transmission lines) will *de facto* create a *de facto* "solar zone" in this area undermining the PEIS planning process undertaken by the BLM.

i. Soil and Water Resources 6.9:

Water Resources: The FSA/DEIS fails to adequately address the hydrology of the groundwater basins that are proposed to be pumped by the applicant and the likely impacts to other area waters including surface waters. As noted above, the FSA/DEIS simply assumes there will be no impacts to springs utilized by wildlife in the surrounding mountains and wilderness areas, no information regarding the basis of this conclusion is provided. The FSA/DEIS identifies impacts to surface drainages on the bajada/alluvial fan that would be destroyed by the project but fails to adequately address avoidance and minimization of these impacts. The FSA/DEIS also fails to provide any specific discussion of mitigation for these impacts—again deferring the plan to a later date.

Soils: Damage to intact desert soils and the resulting increased siltation during flooding and dust are not adequately analyzed in the FSA/DEIS. For example, off-site impacts from silt washed down through the site during flood events and the impacts of those events on habitat for desert tortoise and rare plants are not fully examined, avoided, minimized, and mitigated.

j. Cumulative Impacts and Growth Inducing Impacts: The Cumulative Scenario omits several key projects and fails to adequately analyze the scope of the cumulative impacts in this area. The FSA/DEIS fails to adequately consider that the California population of the Northeastern Mojave Desert Tortoise Recovery Unit in the northern Ivanpah Valley is unique in California and is at high risk of extirpation from the state from the cumulative effects of this project, the Optisolar (now First Solar) power project adjacent to ISEGS, the proposed DesertXpress High Speed Passenger Train, and the upgrade of the Eldorado-Ivanpah transmission line in California alone.

The FSA/DEIS fails to adequately identify and analyze both the cumulative impacts and the growth inducing impacts which in this instance are closely tied together. While review of the Optisolar application has yet to begin, the high cost of the Eldorado-Ivanpah transmission upgrade provides a compelling economic incentive for approval of the Optisolar project, virtually ensuring yet another solar power project on prime desert tortoise habitat in the northern Ivanpah Valley. Arguably, neither project alone could amortize the cost of the proposed Eldorado-Ivanpah upgrade, which involves the construction of 35 miles of high voltage lines from California into Nevada and separate telecommunications pathways. The cumulative impacts from these two projects on the northern Ivanpah Valley are not adequately assessed and the growth inducing impacts from the approval of one project on the entire area is not adequately assessed or analyzed.

Moreover, in addition to ISEGS and Optisolar (First Solar) on the northeastern slopes of the Clark Mountains, two solar energy generation facilities are proposed by NextLight Renewable Power on 7,840 acres of public lands on the eastern side of the Ivanpah Valley. These lands are also high quality desert tortoise habitat with intact and robust populations of desert tortoise. The FSA/DEIS fails to adequately assess the cumulative impacts to tortoise in this Recovery Unit from these projects and several other solar projects on the Nevada side of the border. In combination, the cumulative impacts of these developments severely threaten the Northeastern Desert Tortoise Recovery Unit in the entire Ivanpah basin.

Cumulative impacts to special status plants are recognized (Executive Summary, FSA/DEIS, p. 1-15) but the FSA/DEIS has failed to adequately analyze these cumulative impacts across the range of these species and ways to avoid and minimize these impacts. In addition, as noted above, the provisions for “nesting” mitigation do not ensure that the loss of the individual plants and the cumulative impacts from those losses will in fact be adequately compensated.

Cumulative impacts will convert the Northern Ivanpah Valley into a de-facto solar zone and industrial zone. The cumulative impacts to species across the zone and across the stateline into the eastern Ivanpah Valley are not adequately addressed as well as the conversion of a largely natural area – the Ivanpah Valley and dry lake area as a whole—into a largely industrialized area with more than 6 large scale solar plants, the accompanying substations and power lines, glare and heat islands that will be created across the “zone.”

National Park lands resources will also be cumulatively impacted in several ways. The Clark Mountains, part of the Mojave National Preserve, rise to almost 8,000 feet from the Ivanpah Valley and view of the mountains from the valley will be marred by the seven towers of the ISEGS project, each rising to 459 feet above the valley.

In addition, the project's array of 428,000 mirrors will impair the view from Clark Mountain within the Mojave National Preserve, a popular and well known site among rock climbers. Scenic views from two wilderness areas (Mesquite and Stateline) will also be adversely affected. Staff note these impacts to visual resources (*see* FSA/DEIS p. 1-30) but the FSA/DEIS fails to look at ways to avoid these impacts through alternative siting or otherwise.

k. Alternatives Analysis:

The FSA/DEIS fails to provide alternatives that would avoid significant impacts of the project particularly the significant impacts to biological resources. The FSA/DEIS examines several project alternatives that staff had already determined would not meet the purpose and need of the project in what appears to be an elevation of form over substance. Because the alternatives analysis is the "heart" of any environmental review, the failure to provide meaningful alternatives is fatal to this FSA/DEIS. Indeed, even the CDFG noted that a "full analysis" of alternate sites was still lacking in the FSA/DEIS. CDFG Comments dated October 27, 2009 at 3. Unfortunately, rather than looking for meaningful alternatives that avoid significant impacts to the Northeastern Mojave desert tortoise and other significant biological resources, the Staff appears to simply accept the applicant's proposal and choice to build the proposed project in "excellent tortoise habitat, with a low level of disturbance and high plant species diversity," even where "lower quality habitat is clearly within range to potentially reduce the overall Project impacts to endangered and sensitive species." *Id.*

4. The identity of each witness sponsored by each party (note: expert witnesses must have professional expertise in the scope of their testimony); the topic area(s) which each witness will present; a brief summary of the testimony to be offered by each witness; qualifications of each witness; and the time required to present direct testimony by each witness:

WWP does not have a witness list at this time due to the short time period for preparation.

5. Topic areas upon which a party desires to cross-examine witnesses, a summary of the scope of such cross-examination, and the time desired for such cross-examination:

WWP requests the opportunity to cross-examine Staff and Applicant witnesses on all topic areas in dispute and witnesses presented by other Interveners. Until we see other parties' prehearing conference statements, witness lists, and exhibit lists, we cannot be certain about the nature or extent of cross-examination.

6. A list identifying exhibits and declarations that each party intends to offer into evidence and the technical topics to which they apply:

In addition to re-submitting exhibits submitted with our earlier comments, WWP anticipates providing a complete list of exhibits along with the final Prehearing Statement.

7. Proposals for briefing deadlines, vacation schedules, and other scheduling matters:

WWP requests that the evidentiary hearing be continued until January 11 and 12, 2010, in order to provide sufficient time for all parties to review the FSA/DEIS and all supporting documents.

8. For all topics, the parties shall review the Proposed Conditions of Certification listed in the Final Staff Assessment (FSA) for enforceability, comprehension, and consistency with the evidence, and submit any proposed modifications.

In general, the proposed conditions appear to be vague and do not meet the CEQA requirements that mitigation measures be specific, feasible, and enforceable.

The proposed desert tortoise mitigation measures do not mitigate impacts to the Northeastern Mojave Evolutionary Significant Unit (ESU). The direct, indirect and cumulative effects of this project to the Northeastern Mojave ESU are so severe they will endanger the population in California. The Conditions of Certification should specify that compensation habitat must be acquired in and other mitigation measures must be performed within the Northeastern Mojave Desert Tortoise Recovery Unit. Without this

9. For the preliminary statement only, for discussion at the November 18 Prehearing Conference:

a) any comments the party wishes to make about this schedule, including any alternative schedule proposals.

WWP requests that the evidentiary hearing be continued until at least January 11 and 12, 2010. If the evidentiary hearings are continued until January 11 and 12, the other deadlines should be continued as well as follows:

Staff and Interveners file and serve opening testimony: **Wednesday, December 30, 2009**

Parties file Final Prehearing Conference Statements: **Tuesday, January 5, 2010**

All parties file rebuttal testimony: **Wednesday, January 6, 2010**

Second Prehearing Conference: **Thursday, January 7, 2010**

Evidentiary hearings: **Monday and Tuesday January 11 and 12, 2010.**

b) updated information about the remaining steps in the BLM process, including a projected timetable, to assist the Committee in coordinating this AFC process with BLM's process.

WWP has no additional information regarding the BLM timetable at this time.

Dated: November 15, 2009

Respectfully submitted,

A handwritten signature in black ink that reads "Michael J. Connor". The signature is written in a cursive style and is underlined with a single horizontal line.

Michael J. Connor, Ph.D.
California Director
Western Watersheds Project
PO Box 2364
Reseda, CA 91337-2364
(818) 345-0425
mjconnor@westernwatersheds.org

**California Energy Resources Conservation
and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE IVANPAH SOLAR
ELECTRIC
GENERATING SYSTEM

DOCKET NO. 07-AFC-5

DECLARATION OF SERVICE

I, Michael J. Connor, declare that on November 16, 2009, I served and filed copies of the attached Preliminary Preconference Hearing Statement, dated November 16, 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 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 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

Attn: Docket No.

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.



Michael J. Connor, Ph.D.

Sent via email to: sdeyoung@brightsourceenergy.com; tstewart@brightsourceenergy.com; jcarrier@ch2m.com; jdh@eslawfirm.com; e-recipient@caiso.com; tom_hurshman@blm.gov; Raymond_Lee@ca.blm.gov; dfgpalm@adelphia.net; tgulessarian@adamsbroadwell.com; mjconnor@westernwatersheds.org; gloria.smith@sierraclub.org; joanne.spalding@sierraclub.org; gssilliman@csupomona.edu; jbasofin@defenders.org; gsuba@cnps.org; thansen@cnps.org; granites@telis.org; jbyron@energy.state.ca.us; jboyd@energy.state.ca.us; pkramer@energy.state.ca.us; jkessler@energy.state.ca.us; dratliff@energy.state.ca.us; publicadviser@energy.state.ca.us; docket@energy.state.ca.us; lbelenky@biologicaldiversity.org; ianderson@biologicaldiversity.org

Sent via US mail to:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-5
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

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

John L. Carrier, J. D.
2485 Natomas Park Dr. #600
Sacramento, CA 95833-2937

Jeffery D. Harris
Ellison, Schneider & Harris L.L.P.
2600 Capitol Avenue, Ste. 400
Sacramento, CA 95816-5905

Tom Hurshman,
Project Manager
Bureau of Land Management
2465 South Townsend Ave.
Montrose, CO 81401

Raymond C. Lee, Field Manager
Bureau of Land Management
1303 South U.S. Highway 95
Needles, CA 92363

Becky Jones
California Department of
Fish & Game
36431 41st Street East
Palmdale, CA 93552

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

Basin and Range Watch
Laura Cunningham
Kevin Emmerich
P.O. Box 70
Beatty, NV 89003