

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of: )  
 ) DOCKET NO. 11-AFC-2  
 APPLICATION FOR CERTIFICATION FOR )  
 THE HIDDEN HILLS SOLAR ELECTRIC )  
 GENERATION SYSTEM (SEGS) )  
 \_\_\_\_\_ )

PETITION TO INTERVENE BY  
 THE AMARGOSA LAND TRUST  
 d/b/a  
 THE AMARGOSA CONSERVANCY  
 A CALIFORNIA NOT FOR PROFIT CORPORATION

February 4, 2013  
 Donna Lamm, Executive Director  
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Pursuant to Sections 1207 and 1712 of Title 20 of the California Code of Regulation,  
 the Amargosa Land Trust, d/b/a the Amargosa Conservancy (AC), petitions to  
 intervene in this proceeding.

The Amargosa Conservancy is a duly qualified California not-for-profit corporation,  
 whose mission is to preserve the land, waters and beauty of the Amargosa region.  
 Headquartered in Shoshone, California, AC is a local conservation organization

primarily concerned with maintaining the groundwater, scenic, historic, and ecological resources in this unique desert region.

The proposed Hidden Hills Solar Electric Generating System (HHSEGS) facilities would be located in and pump groundwater from aquifers of the Pahrump Groundwater Basin in California and Nevada. The hydrologic connection between the Pahrump Basin and the Amargosa Basin is not well understood, but it is likely that the basins are hydrologically connected. HHSEGS pumping would aggravate the loss of groundwater storage in the over-drafted bi-state Pahrump Basin, and over coming decades, may adversely affect the springs, seeps and regional groundwater levels that support the small local human communities and an array of world-class riparian and aquatic species in the Wild and Scenic Amargosa River and its tributaries.

Construction and operation of the HHSEGS plants would also cause significant adverse changes to the scenic, historic, and cultural values of the area, and may adversely affect resident and migratory birds and bats in the region.

The Amargosa Conservancy has closely followed the CEC HHSEGS proceedings, and has commented several times on the project, especially regarding the effects of the project's proposed use of groundwater--and the provisions designed to minimize adverse effects of that use.

After reviewing the Final Staff Assessment, the AC does not believe that the current staff proposed water supply and biological resources conditions are adequate to protect the region's resources--especially the Wild and Scenic Amargosa River. We have also reviewed the changes to the staff's conditions proposed by the Applicant in its testimony and believe that if they were adopted—even in part— protection of regional groundwater dependent resources would be illusory.

The Amargosa Conservancy has concluded that its interests can only be represented and protected by intervening in the proceeding and becoming a party. Those interests, including those of the organization, its board, staff and general membership, would be directly affected by this project.

Filings in this matter shall be served on the Amargosa Conservancy to the following individuals. Email service is preferred.

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This petition to intervene is timely and in light of the Amargosa Conservancy's past active participation through comments, will not prejudice any party.

For the foregoing reasons, the Amargosa Conservancy respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow the Amargosa Conservancy to participate as a party.

Dated: February 4, 2013

Respectfully submitted,



Donna Lamm, Executive Director  
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**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
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**APPLICATION FOR CERTIFICATION FOR THE  
HIDDEN HILLS SOLAR ELECTRIC  
GENERATING SYSTEM**

**Docket No. 11-AFC-02**

**PROOF OF SERVICE  
(Revised 1/16/13)**

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*After docketing, the Docket Unit  
will provide a copy to the persons listed  
below. Do not send copies of  
documents to these persons  
unless specifically directed to do  
so.*

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**DECLARATION OF SERVICE**

I, Donna Lamm, declare that on February 4, 2013, I served and filed copies of the attached, dated February 4, 2013. This document is accompanied by the most recent Proof of Service.

The document has been sent to the other persons on the Service List above in the following manner: **(Check one)**

**For service to all other parties and filing with the Docket Unit at the Energy Commission:**

I e-mailed the document to all e-mail addresses on the attached Service List and personally delivered it or deposited it in the US mail with first class postage to the Docket Unit at the Energy Commission and to the addresses list on the Service List for the Applicant; **OR**

Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: 2-4-2013

  
EXECUTIVE DIRECTOR  
AMARGOSA CONSERVANCY