

February 9, 2026

Cathreen Richards, Planning Director
Inyo County Planning Department
168 N. Edwards Street
Independence, CA 93526

cc: Board of Supervisors, Planning Commission, Cynthia Draper, Associate Planner

Re: Bonanza Peak Solar Project--request for Subsequent Environmental Impact Report

The undersigned organizations and individuals respectfully request that Inyo County prepare a site-specific Subsequent Environmental Impact Report (SEIR) for the proposed Bonanza Peak Solar Project (Project), rather than relying on an Addendum to the 2015 Final Programmatic Environmental Impact Report (PEIR) for Inyo County's Renewable Energy General Plan Amendment (REGPA).

Under CEQA, an Addendum is intended only for minor changes to a previously analyzed project. The Bonanza Peak Solar Project is not a minor change. It is a 500-megawatt industrial solar facility proposed on approximately 2,400 acres of private land in Charleston View, California. The Project includes extensive solar arrays, a new substation, new access roads, an Operations and Maintenance building, and a nine-mile, 230-kilovolt generation-tie transmission line connecting to the Trout Canyon Substation in Nevada.

The Project site overlaps the location of the former, proposed Hidden Hills Solar Electric Generating System (HHSEGS), which was withdrawn in 2015 in part due to its significant and unavoidable impacts to environmental, cultural, and historic resources, including impacts to the Old Spanish National Historic Trail.

The 2015 PEIR addressed potential impacts only at a programmatic level for future projects within designated Solar Energy Development Areas (SEDAs). It did not evaluate site-specific conditions or impacts under current environmental, cultural, hydrologic, or visual circumstances. As a result, the PEIR cannot adequately support an Addendum for this Project. A full SEIR is required to analyze the Project's new and more severe impacts, and to provide meaningful public review and participation.

The Project would result in significant impacts to the following resources:

***Air Quality:** Construction would generate substantial fugitive dust, potentially affecting public health in nearby communities.

***Groundwater Resources:** A project of this scale may require 500 to 1,000 acre-feet of water during construction for dust suppression, raising serious concerns about groundwater depletion and impacts to local wells.

***Old Spanish National Historic Trail:** The Project's southeast boundary lies approximately 1¼ miles from the Trail's centerline and is entirely within the 10-mile-wide Old Spanish Trail corridor designated by the Bureau of Land Management and the National Park Service. The Project would significantly degrade the historic setting, viewshed, and experiential integrity of this nationally significant resource.

***Wildlife:** The Project would destroy habitat for desert tortoise, burrowing owl, kit fox, and migratory birds, and would impair landscape connectivity **for larger species such as** desert bighorn sheep.

***Rare Plants:** The Project would remove native vegetation across 2,400 acres, as well as along the generation-tie line corridor, impacting rare species such as Pahrump buckwheat. Ground disturbance would also facilitate invasive weeds, likely leading to long-term herbicide use.

***Public Health and Property Values:** The Project would introduce large-scale industrial visual impacts into a rural residential area, reducing community desirability and property values. Fugitive dust and groundwater drawdown present additional risks to public health and domestic water supplies.

***Cumulative Impacts:** The generation-tie transmission line in Nevada would contribute to cumulative impacts affecting desert tortoise, rare plants, cultural resources, visual resources, and the Old Spanish National Historic Trail.

The Project also has a clear NEPA nexus, as it requires a BLM right-of-way for the transmission line connection to the Trout Canyon Substation in Nevada. The transmission line would have significant visual and cultural impacts along Tecopa Road, an important corridor for experiencing the historic route of the Old Spanish National Historic Trail.

We therefore urge Inyo County to evaluate the Bonanza Peak Solar Project through a full, project-specific Subsequent Environmental Impact Report, including all required CEQA procedures: a Notice of Preparation, public scoping, preparation and circulation of a Draft EIR, public meetings and hearings, and a Final EIR.

Despite the Project application having been submitted in July 2024, there is currently no information available on the Inyo County Planning Department website, and many residents remain unaware that one of the largest industrial developments ever proposed in Inyo County is under consideration. There is an immediate need to create a **Bonanza Peak Solar Project** folder under *Current Projects* on the Inyo County Planning website. All the pertinent documents can be placed there, including relevant Planning Commission decisions, Board of Supervisors decisions, Findings, and Resolutions.

The Charleston View SEDA was the most controversial location identified in the 2015 REGPA. Given the scale and severity of impacts associated with this Project, the residents of Inyo County deserve full transparency, disclosure, and meaningful public participation. This can only be achieved through preparation of a complete SEIR.

Sincerely,

Richard Waller, President, Old Spanish Trail Association

Lynn Brittner, Executive Director, Old Spanish Trail Association

Jack Prichett, Co-Chair, Stewardship Committee, Old Spanish Trail Association



Bill Helmer, Co-Chair, Stewardship Committee, Old Spanish Trail Association



Kevin Emmerich, Co-Founder
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Shannon Salter, Creative Coordinator
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Steve Bardwell, President
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